
ICE Detention Standards Compliance Review

Taylor County Adult Detention Facility

August 12 - 14, 2008

REPORT DATE – August 22, 2008



Contract Number: ODT-6-D-0001
Order Number: HSCEOP-07-F-01016

b6 [REDACTED] Executive Vice President
Creative Corrections
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b6 [REDACTED] COTR
U.S. Immigration and Customs Enforcement
Detention Standards Compliance Unit
801 I Street NW
Washington, DC 20536

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August 22, 2008

MEMORANDUM FOR: James T. Hayes, Jr., Acting Director
Office of Detention and Removal Operations

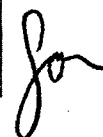
FROM:

[REDACTED] b6, b7c

[REDACTED] b6, b7c

[REDACTED] b6, b7c

Reviewer-In-Charge



SUBJECT: Taylor County Adult Detention Center
Annual Detention Review

Creative Corrections conducted an ADR of the Taylor County Adult Detention Center (TCADC), Abilene, Texas, on August 12 - 14, 2008. As noted on the attached documents, the team of Subject Matter Experts (SME) included [REDACTED] b6, b7c, SME for Security; [REDACTED] b6 SME for Health Services; [REDACTED] b6, b7c SME for Safety; and [REDACTED] b6 SME for Food Service.

A final closeout was held on August 14, 2008, with Major [REDACTED] b6, b7c, Jail Administrator, and review team members, at which time all aspects of the review were discussed.

Type of Review

This review is a scheduled Detention Standard Review to determine general compliance with established ICE National Detention Standards for facilities used for over 72 hours.

Review Summary

The TCADA is not accredited by the American Correctional Association (ACA), National Commission on Correctional Health Care (NCCHC), or the Joint Commission on Accreditation of Healthcare Organizations (JCAHO).

Standards Compliance

The following statistical information provides a direct comparison of the 2007 ADR and the ADR conducted in 2008.

September 11 - 13, 2007

Compliant - 38
Deficient - 0
At-Risk - 0
Not-Applicable - 0

August 12 - 14, 2008

Compliant - 30
Deficient - 8
At-Risk - 0
Not-Applicable - 0

Food Service - Deficient

Every facility will provide detainees in its care with nutritious and appetizing meals, prepared in accordance with the highest sanitary standards.

- A knife cabinet is not in use; knives are tethered to a workstation at all times but cables do not pass through the metal shanks. Knives are not marked or inventoried.
- Special procedures for handling food items that pose a security threat (alcohol-based flavorings) are not in place.
- The facility does not have a standard 35-day menu cycle or similar system for rotating meals; a registered dietitian does not conduct a complete nutritional analysis of the master-cycle menu. There is no common-fare program.
- The satellite-feeding program does not include sufficient sanitation practices.

Recommendations

The facility should install a knife cabinet with an approved locking device; knives should be etched and inventoried. A cable should be inserted through the knives' metal shanks. Any food items that pose a threat to security should be handled in a special way. A master-cycle menu should be developed, per ICE standards, and a credentialed dietitian should conduct a nutritional analysis of the master-cycle menu. A common-fare program should be implemented. Proper sanitation should be practiced for the satellite-feeding program.

Terminal Illness, Advanced Directives, and Death – Deficient

All facilities housing ICE detainees shall have policies and procedures addressing the issues of terminal illness or injury, medical advanced directives, and detainee death, to include the procedures to ensure proper notification is provided to ICE officials, family members and other interested parties in the event of a detainee becoming terminally ill or injured or death of a detainee occurs. In addition, the policy will cover procedures to be taken if the death of a detainee occurs while in transit.

- There are no guidelines addressing the State Advanced Directive Form for Implementing Living Wills and Advanced Directives; no written procedures addressing the issues of organ donation by detainees, or policy addressing procedures to ensure proper notification is provided to ICE officials, family members and other interested parties in the event of a detainee's terminal illness or death.

Recommendations

Facility staff should develop protocols to address the State Advanced Directive Form for Implementing Living Wills and Advanced Directives. The option of organ donation should be available to detainees. Immediate notification should be provided to ICE officials, family members and other interested parties when a detainee becomes terminally ill or dies.

Emergency Plans – Deficient

Every facility will develop plans and procedures for handling emergencies reasonably likely to occur. The goal of these "contingency plans" is to control the situation without endangering lives or property.

- Plans do not identify the location of shut-off mechanisms for all utilities and do not address confidentiality, accountability, updates, or emergency medical treatment for staff and detainees during or after an incident.
- Training files did not reflect staff training to recognizing signs of detainee unrest, or hostage situation training. Staff did not receive copies of the hostage management policy.

Recommendations

Facility staff should revise the emergency plans to include a comprehensive general section that applies to most emergencies. A section identifying the locations of shut off valves and switches for all utilities should also be included. Plans should address confidentiality, accountability, and routine updates. Both staff and detainees should be afforded emergency medical treatment during or after an incident. Staff should be trained to recognize detainee unrest and should be familiar with the hostage situation policy; training should be documented.

Environmental Health and Safety-Deficient

Every facility will control flammable, toxic, and caustic materials through a hazardous materials program. The program will include, among other things, the identification and labeling of hazardous materials in accordance with applicable standards (e.g., National Fire Protection Association [NFPA]); identification of incompatible materials, and safe-handling procedures. Every facility will comply with standards and regulations issued by the Environmental Protection Agency (EPA) and OSHA, the American Correctional Association's "mandatory" standards, local and national fire safety codes, and the applicable standards of the American Society for

Testing and Materials, American National Standards Institute, and Underwriters' Laboratories or Factory Mutual Engineering.

- Constant inventories are not maintained for hazardous materials in the facility. The MSDS file does not include a list of all hazardous substance storage areas, or a plant diagram and legend.
- Employees and detainees are not properly trained to handle hazardous substances.
- The fire plan does not include public posting of emergency plans with accessible building/room floor plans; exit signs and directional arrows, or an area specific exit diagram conspicuously posted in the diagrammed area.
- There were no written procedures regarding blood and other body fluid contacts; there was no evidence staff were trained in this area. There is no guidance for handling used needles and other sharp instruments.

Recommendations

Constant inventories for all hazardous materials should be maintained. The MSDS file should include a list of all hazardous substance storage areas, a plant diagram, and a legend. Anyone handling hazardous chemicals should receive proper, advanced training. The fire plan should include the requirement to post (publicly) emergency plans and options for egress, with complete directions to exit from the specific, diagrammed area; plans should be in English and Spanish. Staff should receive training relative to blood / body fluid contacts. Written procedures for the handling of used needles and sharps should be developed.

Key and Lock Control - Deficient

Every facility will maintain an efficient system for the use, accountability, and maintenance of keys and locks.

- TCADC does not have policy or practices that govern key accountability or maintenance of all locking devices. No one is designated to facilitate this program or train others; staff is not trained to handle keys properly.
- Key inventories are incomplete; there is no inventory of locking devices. There is no preventive maintenance program and no guidance as to compromised keys and locks. Damaged or discarded keys were not disposed of and the key board is insufficient to accept all facility key rings. Key rings are not identifiable and keys can be removed from rings. Keys are not counted. There is no protocol for restricted keys.

Recommendations

Facility management should develop a comprehensive key control system that includes all governing ICE standards. Keys and locks must be controlled, stored properly, and maintained in

working order. Keys must be individually counted and key rings identified by a designated indicator (letter/number) chit and a chit including the key count for the ring. Keys should not be able to be removed from the ring. Compromised, damaged, or lost keys should be dealt with uniformly. A trained specialist should be appointed to manage this program and that person should train other staff to handle keys with care.

Post Orders – Deficient

Each officer will have written post orders that specifically apply to his/her current duties. The post orders will specify the duties of the post officer, along with instructions on how to perform those duties. The step-by-step procedures will include enough detail to guide a novice assigned to the post. The OIC will also develop post orders for non-permanent assignments (details, temporary housing units, emergency changes, etc.) If events preclude advance planning, the OIC will issue a post order as soon as possible after the need arises.

- There are no post orders for any post at TCADC.

Recommendations

A system of Posts Orders should be developed to provide direction for staff, in the interest of safety and security. The Jail Administrator should identify a specific staff member who is responsible for the implementation of this program and supplemental training for staff.

Security Inspections - Deficient

Post assignment in the facility's high risk areas, where special security procedures must be followed, should be restricted to experienced personnel with a thorough grounding in facility operations.

- There was no evidence that a security inspection program is in place for critical areas of the facility (housing units, utility areas, perimeter fence, visiting area, for example). There are no procedures for reporting (to a management official) recurring security problems. There is no secure visitor pass system in place.



- The facility does not search or maintain a log of incoming or departing vehicles (including staff personal vehicles) to sensitive areas of the facility. Tools are not inventoried before entering or prior to departure from the facility.

Recommendations

Facility managers should develop a comprehensive security inspection system, which includes ALL areas of the facility and addresses how to respond to problem areas. A secure visitor pass system would enable staff to account for contractors or volunteers in the facility. Contractors should not be in control of facility in/out traffic, issuing keys to them should be discontinued. Vehicles should be searched and logged upon entry or departure and tools should be inventoried before coming into the facility and prior to departure. In summary, the secure perimeter of the facility must be protected and thorough searches must be commonplace inside the institution.

Tool Control – Deficient

Every facility shall establish a tool-control policy with which all employees shall comply. The Maintenance supervisor shall maintain a computer-generated or typewritten inventory of tools and equipment, and storage locations. These inventories shall be current, filed, and readily available during an audit.

- Department heads are not responsible for tool control. Tool inventories are not maintained nor is there a tool classification system. Tools are not marked; there is no approved tool storage system; there are no procedures regarding issuance of tools, or addressing lost, broken, or worn tools.

Recommendations

Facility managers should develop a comprehensive tool control program and afford training to those staff responsible for handling tools. Tools should be accounted for routinely, stored properly, easily identified by storage location, and classified (restricted /non-restricted). Guidance should be clear in the event of lost, broken, or worn tools. As previously mentioned, any tools entering / leaving the facility with contractors should also be inventoried.

Recommended Rating and Justification

It is the RIC recommendation that the facility receive a rating of "Deficient."

RIC Assurance Statement

All findings of this review have been documented on the Work Sheets and are supported by the written documentation contained in the review file.

A. Type of Facility Reviewed

ICE Service Processing Center
 ICE Contract Detention Facility
 ICE Intergovernmental Service Agreement

B. Current Inspection

Type of Inspection
 Field Office HQ Inspection
Date[s] of Facility Review
August 12 - 14, 2008

C. Previous/Most Recent Facility Review

Date[s] of Last Facility Review
September 11 - 13, 2007 - Initial review
Previous Rating
 Superior Good Acceptable Deficient At-Risk

D. Name and Location of Facility

Name
Taylor County Adult Detention Center
Address (Street and Name)
910 S. 27th Street
City, State and Zip Code
Abilene, TX 79602
County
Taylor
Name and Title of Chief Executive Officer (Warden/OIC/Supt.)
Major [REDACTED] Jail Administrator
Telephone # (Include Area Code)
325 [REDACTED]
Field Office / Sub-Office (List Office with oversight responsibilities)
Dallas, TX
Distance from Field Office
185 miles

E. ICE Information

Name of Inspector (Last Name, Title and Duty Station)
[REDACTED] / Reviewer-In-Charge / NM
Name of Team Member / Title / Duty Location
[REDACTED] / SME Security / IL
Name of Team Member / Title / Duty Location
[REDACTED] / SME Medical / OK
Name of Team Member / Title / Duty Location
[REDACTED] / SME Food Service / IN
Name of Team Member / Title / Duty Location
[REDACTED] / SME Safety / IN

F. CDF/IGSA Information Only

Contract Number
HSBP1007P1Z694
Date of Contract or IGSA
Not provided
Basic Rates per Man-Day
\$ 35.00 through 9/30/08
Other Charges: (If None, Indicate N/A)
N/A

Estimated Man-days Per Year:
0

G. Accreditation Certificates

List all State or National Accreditation[s] received:
Texas Commission on Jail Standards 2/08
 Check box if facility has no accreditation[s]

H. Problems / Complaints (Copies must be attached)

The Facility is under Court Order or Class Action Finding
 Court Order Class Action Order
The Facility has Significant Litigation Pending
 Major Litigation Life/Safety Issues
 Check if None.

I. Facility History

Date Built
1984 / 234 beds
Date Last Remodeled or Upgraded
1999 / 426 beds added
Date New Construction / Bed space Added
Current/212 beds being added.
Future Construction Planned
 Yes No Date: **12/08**
Current Bed space
662
Future Bed space (# New Beds only)
Number: **212** Date: **12/08**

J. Total Facility Population

Total Facility Intake for previous 12 months
10,892
Total ICE Man-days for Previous 12 months
0

K. Classification Level (ICE SPCs and CDFs Only)

	L-1	L-2	L-3
Adult Male			
Adult Female			

L. Facility Capacity

	Rated	Operational	Emergency
Adult Male	544	544	544
Adult Female	118	118	118

Facility holds Juveniles Offenders 16 and older as Adults

M. Average Daily Population

	ICE	USMS	Other
Adult Male	0		
Adult Female	0		

N. Facility Staffing Level

Security: [REDACTED] Support: [REDACTED]

- Significant Incident Summary Worksheet

For ICE to complete its review of your facility, the following information must be completed prior to the scheduled review dates. The information on this form should contain data for the past twelve months in the boxes provided. The information on this form is used in conjunction with the ICE Detention Standards in assessing your Detention Operations against the needs of the ICE and its detained population. This form should be filled out by the facility prior to the start of any inspection. Failure to complete this section will result in a delay in processing this report and the possible reduction or removal of ICE' detainees at your facility.

<i>Incidents</i>	<i>Description</i>	Jan – Mar	Apr – Jun	Jul – Sept	Oct – Dec
Assault: Offenders on Offenders ¹	Types (Sexual ² , Physical, etc.)	P	P	P	P
	With Weapon	0	0	0	0
	Without Weapon	37	21	13	30
Assault: Detainee on Staff	Types (Sexual Physical, etc.)	P	P	P	P
	With Weapon	0	0	0	0
	Without Weapon	1	2	1	0
Number of Forced Moves, incl. Forced Cell moves ³		0	0	0	0
Disturbances ⁴		0	0	0	0
Number of Times Chemical Agents Used		# not avail.	# not avail.	# not avail.	# not avail.
Number of Times Special Reaction Team Deployed/Used		0	0	0	0
# Times Four/Five Point Restraints applied/used	Number/Reason (M=Medical, V=Violent Behavior, O=Other)	# not avail.	# not avail.	# not avail.	# not avail.
	Type (C=Chair, B=Bed, BB=Board, O=Other)	C	C	C	C
Offender / Detainee Medical Referrals as a result of injuries sustained.		0	0	0	0
Escapes	Attempted	0	0	0	0
	Actual	0	0	1*	0
Grievances:	# Received	156	250	120	157
	# Resolved in favor of: Offender/Detainee	25	50	11	18
Deaths	Reason (V=Violent, I=Illness, S=Suicide, A=Attempted Suicide, O=Other)	I/A**	0	0	0
	Number	1/1**	0	0	0
Psychiatric / Medical Referrals	# Medical Cases referred for Outside Care	# not avail.	# not avail.	# not avail.	#not avail.
	# Psychiatric Cases referred for Outside Care	# not avail.	# not avail.	# not avail.	#not avail.

¹ Any attempted physical contact or physical contact that involves two or more offenders

² Oral, anal or vaginal penetration or attempted penetration involving at least 2 parties, whether it is consenting or non-consenting

³ Routine transportation of detainees/offenders is not considered "forced"

⁴ Any incident that involves four or more detainees/offenders, includes gang fights, organized multiple hunger strikes, work stoppages, hostage situations, major fires, or other large scale incidents.

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DHS/ICE Detention Standards Review Summary Report						
1. Acceptable 2. Deficient 3. At Risk 4. Repeat Finding 5. Not Applicable						
Legal Access Standards		1.	2.	3.	4.	5.
1.	Access to Legal Materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.	Group Presentations on Legal Rights	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.	Visitation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.	Telephone Access	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainee Services						
5.	Admission and Release	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.	Classification System	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.	Correspondence and Other Mail	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8.	Detainee Handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9.	Food Service	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10.	Funds and Personal Property	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11.	Detainee Grievance Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12.	Issuance and Exchange of Clothing, Bedding, and Towels	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13.	Marriage Requests	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14.	Non-Medical Emergency Escorted Trip	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15.	Recreation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16.	Religious Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17.	Voluntary Work Program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health Services						
18.	Hunger Strikes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19.	Medical Care	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20.	Suicide Prevention and Intervention	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
21.	Terminal Illness, Advanced Directives and Death	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Security and Control						
22.	Contraband	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
23.	Detention Files	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24.	Disciplinary Policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25.	Emergency Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
26.	Environmental Health and Safety	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
27.	Hold Rooms in Detention Facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
28.	Key and Lock Control	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
29.	Population Counts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
30.	Post Orders	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
31.	Security Inspections	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
32.	Special Management Units (Administrative Segregation)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
33.	Special Management Units (Disciplinary Segregation)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
34.	Tool Control	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
35.	Transportation (Land management)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
36.	Use of Force	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
37.	Staff / Detainee Communication (Added August 2003)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
38.	Detainee Transfer (Added September 2004)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

All findings (Deficient and At-Risk) require written comment describing the finding and what is necessary to meet compliance.

RIC Review Assurance Statement

By signing below, the Reviewer-In-Charge (RIC) certifies that all findings of noncompliance with policy or inadequate controls contained in the Inspection Report are supported by evidence that is sufficient and reliable. Furthermore, findings of noteworthy accomplishments are supported by sufficient and reliable evidence. Within the scope of the review, the facility is operating in accordance with applicable law and policy, and property and resources are efficiently used and adequately safeguarded, except for the deficiencies noted in the report.

Reviewer-In-Charge: (Print Name) b6, b7c	Signature b6, b7c
Title & Duty Location	
Reviewer-In-Charge/NM	

Team Members	
Print Name, Title, & Duty Location b6, b7c SME Security, IL	Print Name, Title, & Duty Location b6 SME Medical, OK
Print Name, Title, & Duty Location b6 SME Food Service, IN	Print Name, Title, & Duty Location b6, b7c SME Safety, IN

Recommended Rating:

- Superior
- Good
- Acceptable
- Deficient
- At-Risk

Comments:

The Jail Administrator, Major [b6, b7c] was promoted to the Administrator's position in May 2008. The staff were responsive and helpful throughout the review. The staff were very visible in the facility and were observed making frequent and positive contacts with the population.

1* Escapes - A minimum security inmate walked out of the secure perimeter on July 28, 2008. He had been assigned to a work detail in the garage wash area, inside the perimeter fence, and walked out the rear gate area after the outside construction workers had entered the area. He was apprehended a short time later with no difficulties.


1** Deaths - A county inmate died of natural causes. 1/08

1** Attempts - A county inmate attempted to hang himself in February 2008. Staff responded and saved his life.

HEADQUARTERS EXECUTIVE REVIEW

Review Authority

The signature below constitutes review of this report and acceptance by the Review Authority. OIC/CEO will have 30 days from receipt of this report to respond to all findings and recommendations.

HQDRO EXECUTIVE REVIEW: (Please Print Name)	Signature
James T. Hayes, Jr.	 b6, b7c
Title	
Director	3/11/09

- Final Rating:
- Superior
 - Good
 - Acceptable
 - Deficient
 - At-Risk
 - No Rating

Comments: The Review Authority has downgraded the recommended rating of "Deficient" to an "At Risk". A Plan of Action is required for deficiencies identified in the Food Service, Terminal Illness, Advanced Directives, and Death, Emergency Plans, Environmental Health and Safety, Key and Lock Control, Post Orders, Security Inspections and Tool Control standards.

In addition, a Plan of Action is required to address the non-compliant components found in the Detainee Grievance Procedures, Access to Telephones, Detainee Handbook, Funds and Personal Property, Hold Rooms in Detention Facilities, Access to Medical, Staff Detainee Communication and Recreation standards.