



A Joint Committee of the Ohio General Assembly

LAKE ERIE CORRECTIONAL INSTITUTION INSPECTION REPORT

NOVEMBER 2020

SEN. WILLIAM P. COLEY, II
Vice-Chair

REP. DOUG GREEN
Chair

SEN. HEARCEL F. CRAIG
Secretary

TABLE OF CONTENTS

SUMMARY

SAFETY & SECURITY

- A. Violence Outcome Measures
- B. Use of Force
- C. Control of Illegal Substances
- D. Offender Perception of Safety
- E. Unit Security Management
- F. Institutional Security Management
- G. Prison Rape Elimination Act (PREA)

HEALTH & WELLBEING

- A. Unit Conditions
- B. Medical Services
- C. Mental Health Services
- D. Recovery Services
- E. Food Services
- F. Recreation

FAIR TREATMENT

- A. Staff/Offender Interactions
- B. Inmate Grievance Procedure
- C. Rules Infraction Board
- D. Transitional Programming Unit

REHABILITATION & REENTRY

- A. Reentry Planning
- B. Rehabilitative Programming
- C. Family Engagement and Community Connections
- D. Academic Programming
- E. Library Services
- F. Vocational and Work Skill Development

FISCAL ACCOUNTABILITY

- A. Fiscal Wellness
- B. Environmental Sustainability
- C. Staff Management

ENDNOTES

**REPORT ON THE INSPECTION & EVALUATION OF
LAKE ERIE CORRECTIONAL INSTITUTION**

Date of Inspection:	November 10, 2020
Type of Inspection:	Announced
CIIC Staff Present:	Travis Ricketts, Deputy Director, In-Person Rachel Helbing, Sr. Analyst, Report Coordinator, Remotely Jeffrey Noble, Senior Analyst, Remotely Elijah Woodberry, Research Analyst, Remotely
Facility Staff Present:	Warden Douglas Fender CIIC spoke with many additional staff throughout the course of the inspection.

Institution Overview

Lake Erie Correctional Institution (LaECI) is a minimum/medium security male prison housing Level 1 (Minimum) and Level 2 (Medium) security offenders. The facility opened in 2000 and is located on 52 acres in Conneaut, Ohio.

The rated capacity for LaECI is 1,798. As of November 10, 2020, the institution housed 1,706 offenders.

Demographically, 52.2% of offenders were classified as black, 43.3% as white, and 4.3% as another race. The youngest offender was listed as 18 years of age and the oldest was listed as 83 years of age. The average offender age was 38 years. As of November 10, 2020, LaECI employed 250 total staff, of which 150 are security staff and 92 are officers.

The institution scored 100% compliance on the June 2018 ACA audit for 57 applicable, mandatory standards, and 99.3% on the 429 applicable, non-mandatory standards. The areas of non-compliance were for unencumbered space in offender cells and washbasin ratios. Both were granted waivers from ACA.

In its July 2019 full internal management audit, LAECI was 100% compliant on the 59 applicable, mandatory standards and 99.3% compliant on the 445 applicable, non-mandatory standards. Of the Ohio Standards, the facility was 95% compliant on the 80 applicable standards. The areas of non-compliance were related to unencumbered space requirements, washbasin ratio, medical care, and hunger strike guidelines.

FACILITY RATINGS

Ratings are a four point scale based on the balance of the indicator ratings for that area. A rating of “Exceptional” for an indicator means that there is no room for improvement and, generally, that the facility performs above other prisons. A rating of “Good” for an indicator means that the prison more than meets the standard, but is not significantly better than other prisons or there is still room for improvement. A rating of “Acceptable” for an indicator means that the prison just meets the standard or meets the standard with minor exceptions. A rating of “In Need of Improvement” for an indicator means that the prison does not meet standards, is significantly different from other prisons in a negative manner, or that CIIC staff had serious concerns.

	2018	2020
SAFETY & SECURITY	GOOD	ACCEPTABLE
<i>Violence Outcome Measures</i>	<i>Acceptable</i>	<i>Acceptable</i>
<i>Use of Force</i>	-	<i>Acceptable</i>
<i>Control of Illegal Substances</i>	<i>Good</i>	<i>In Need of Improvement</i>
<i>Offender Perception of Safety</i>	<i>Good</i>	<i>Good</i>
<i>Unit Security Management</i>	<i>Good</i>	<i>Good</i>
<i>Institutional Security Management</i>	<i>Good</i>	<i>Good</i>
<i>Prison Rape Elimination Act</i>	<i>Good</i>	<i>Good</i>
HEALTH & WELLBEING	GOOD	GOOD
<i>Unit Conditions</i>	<i>Good</i>	<i>Good</i>
<i>Medical Services</i>	<i>Good</i>	<i>Good</i>
<i>Mental Health Services</i>	<i>Good</i>	<i>Good</i>
<i>Recovery Services</i>	<i>Good</i>	<i>Good</i>
<i>Food Services</i>	<i>Good</i>	<i>Good</i>
<i>Recreation</i>	<i>Acceptable</i>	<i>Good</i>
FAIR TREATMENT	GOOD	GOOD
<i>Staff/Offender Interactions</i>	<i>Good</i>	<i>Good</i>
<i>Inmate Grievance Procedure</i>	<i>Good</i>	<i>Good</i>
<i>Transitional Programming Unit</i>	<i>Good</i>	-
<i>Offender Discipline</i>	<i>In Need of Improvement</i>	<i>Good</i>
REHABILITATION & REENTRY	GOOD	GOOD
<i>Reentry Planning</i>	<i>Good</i>	<i>Good</i>
<i>Rehabilitative Programming</i>	<i>Good</i>	<i>Good</i>
<i>Family Engagement & Community Connections</i>	<i>Acceptable</i>	<i>Good</i>
<i>Academic Programming</i>	<i>Good</i>	<i>Good</i>
<i>Library Services</i>	<i>Good</i>	<i>Good</i>
<i>Vocational & Work Skill Development</i>	<i>Exceptional</i>	<i>Exceptional</i>
FISCAL ACCOUNTABILITY	GOOD	DEFERRED
<i>Fiscal Wellness</i>	<i>Acceptable</i>	<i>Deferred</i>
<i>Environmental Sustainability</i>	<i>Good</i>	<i>Deferred</i>
<i>Staff Management</i>	<i>Good</i>	<i>Good</i>

INSPECTION OVERVIEW

Preparation for the inspection of Lake Erie Correctional Institution took place in the week prior to site visitation. The most recent inspection of the facility, completed in 2018, was reviewed to identify areas of previous concern or praise. The CIIC database of concerns received from offenders, constituents, and staff was analyzed for topics of frequent concern.

Facility staff were notified of the inspection during the week prior to visitation. At this time, an email was sent to administrative staff outlining the documentation and data that would be requested over the course of the inspection, as well as a description of the modified inspection process:

“With the goal of reduced impact on facility operations, the in-person inspection process is aimed to be completed by a single CIIC staff member within a half day. The inspector will arrive at 9:00am with the goal of departing by 1:00pm. CIIC recognizes that DRC facilities have staff in cohorts for portions of the prisons to reduce the potential for cross-contamination and spread of the COVID-19 virus. The inspector will work with facility staff to identify the appropriate cohort that will allow for the fulfillment of observational requirements. Inspectors that enter a facility must refrain from entering another facility for a minimum 14-day period.”

The day of inspection, Tuesday, November 10, 2020, consisted of an opening meeting between in-person inspector, Deputy Director Ricketts, and Warden Fender, followed by a facility tour. Areas inspected included: Ontario C&D housing units, dining hall, medical services, recovery services, mental health area, transitional programming unit (TPU), library, and education department. Each remote inspector completed telephone interviews with staff in various positions. Facility staff were welcoming to the CIIC inspectors, and their adaptability to the hybridized inspection process was greatly appreciated.

An initial inspection report draft was provided to Warden Fender and his staff on January 29, 2021 as an opportunity to review and notify CIIC staff of any discrepancies. A teleconference meeting was held between CIIC and Warden Fender to finalize the inspection report draft.

SAFETY & SECURITY: ACCEPTABLE

Expectation: Prisons will provide a safe and secure environment for all offenders.

SAFETY & SECURITY	2018 GOOD	2020 ACCEPTABLE
<i>Violence Outcome Measures</i>	<i>Acceptable</i>	<i>Acceptable</i>
<i>Use of Force</i>	-	<i>Acceptable</i>
<i>Control of Illegal Substances</i>	<i>Good</i>	<i>In Need of Improvement</i>
<i>Offender Perception of Safety</i>	<i>Good</i>	<i>Good</i>
<i>Unit Security Management</i>	<i>Good</i>	<i>Good</i>
<i>Institutional Security Management</i>	<i>Good</i>	<i>Good</i>
<i>Prison Rape Elimination Act</i>	<i>Good</i>	<i>Good</i>

KEY FINDINGS

Inmate on inmate and inmate on staff assaults have decreased from 2017 to 2019.

Fight and violent offense convictions have increased significantly since 2017.

The number of use of force incidents has increased, and is higher than comparable facilities.

No offenders provided statements regarding incidents of force against them.

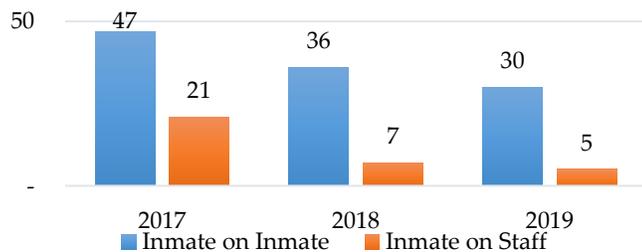
Positive drug testing has increased, and is higher than comparable facilities.

VIOLENCE OUTCOME MEASURES: ACCEPTABLE

Evaluation of violence focuses on the number and rate of disciplinary convictions for assaults, fights, the number of homicides, and disturbances at the institution during a year in comparison to the previous year; the comparator prison rate; and the DRC average.

Assaults

Total Assaults CY 2017 – CY 2019



The rate of offender disciplinary convictions for violent offenses increased by 17.2% during CY 2018 in comparison to CY 2017 and increased 36.3% from 2018 to 2019. There have been 778 violent offense convictions in 2020 to date.

Comparator Facility Rates

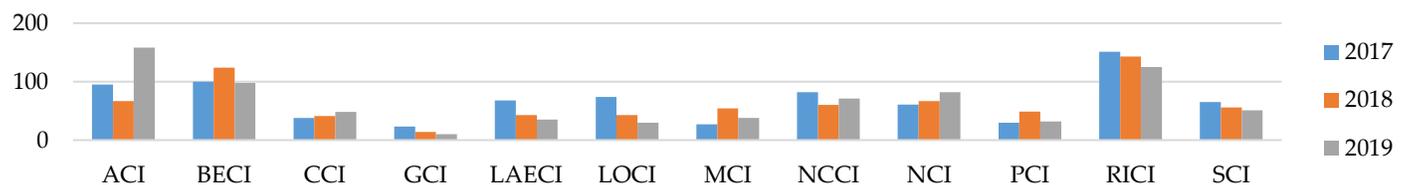
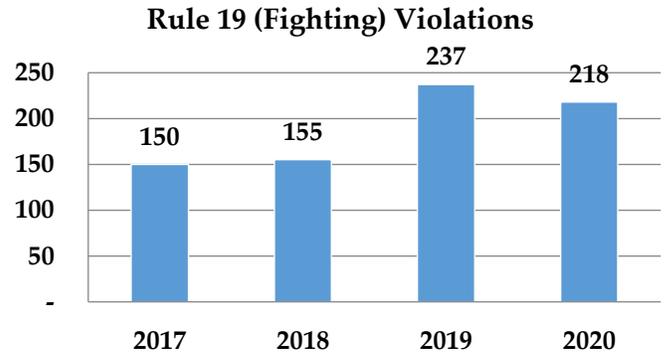


Figure 1: The total combined "inmate on inmate" and "staff on inmate" assaults are graphed above for data collected from 2017-2018 for all DRC level 3/4 institutions.

Fights

Fights¹ are documented via RIB convictions for rule 19 (fight) violations. There were 150 offenses in 2017, 155 offenses in 2018, and 237 offenses in 2019 convicted of a fight violation at Lake Erie Correctional Institution.



Homicides

There were no homicides during the period evaluated (2017 to 2019).

Disturbances²

There have been no disturbances at Lake Erie during the period evaluated (2017 to 2019).

USE OF FORCE: ACCEPTABLE

Evaluation of use of force focuses on the number of uses of force at the institution as well as an evaluation of a random sample of completed use of force reports.

Incident Caseload

During CY 2019, the facility reported 69 use of force incidents. This is an increase from CY 2017 (21) and CY2018 (28).

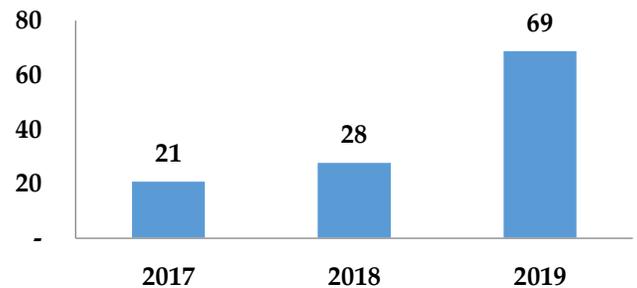
LaECI UoF	2017	%	2018	%	2019*
	21	+33%	28	+146%	69

*2019 is preliminary data provided by the facility and has not been confirmed by ODRC Central Office.

Procedural Accountability

Video documentation was reviewed on 5/5 incidents reviewed. Staff appropriately referred use of force incidents to a use of force committee/investigator. Officer statements reviewed were generally thorough and clearly stated directives given prior to force. The required documentation was completed and included in the packets. All offenders refused to provide a use of force statement. Offenders were generally seen by

LAECI UoF

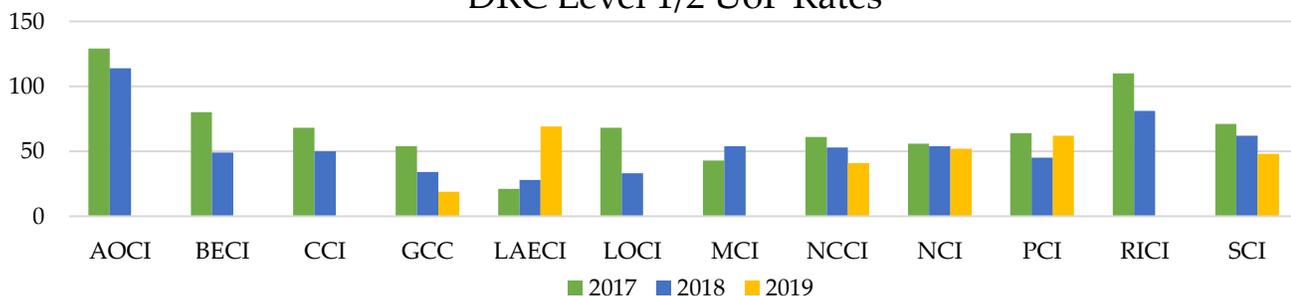


medical within an hour following the use of force incident. Five use of force incident recordings were watched through completion with no issues noted.

Application of Force

Officer responses to incidents generally appeared appropriate. There were very few injuries, all of which were minor and consistent with the level of force.

DRC Level 1/2 UoF Rates



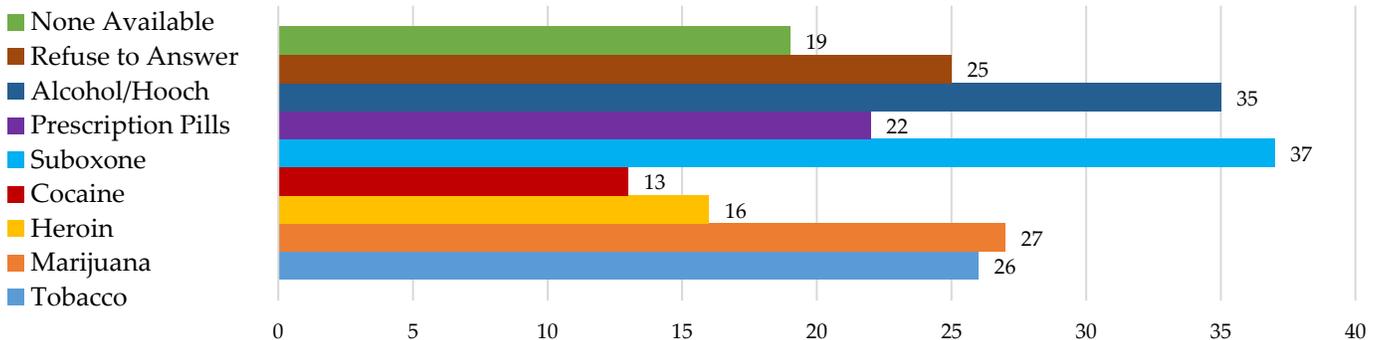
CONTROL OF ILLEGAL SUBSTANCES: IN NEED OF IMPROVEMENT

Evaluation of control of illegal substances focuses on the percentage of offenders who tested positive for an illegal substance at the institution during a year in comparison to the previous year, the comparator prison rate, and the DRC average.

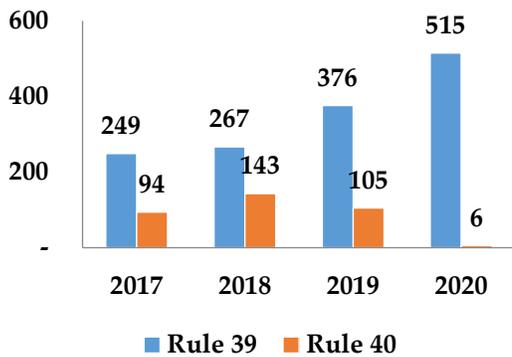
Random Drug Testing	2017		2018		2019	
	# Tested	% Positive	# Tested	% Positive	# Tested	% Positive
Allen-Oakwood	1,187	4.5%	968	7.7%	826	3.3%
Belmont	1,733	5.2%	1,712	2.2%	1,724	5.1%
Chillicothe	1,931	5.5%	261	1.1%	1,784	6.0%
Franklin Medical	461	6.5%	590	8.3%	466	5.4%
Grafton	1,317	0.2%	1,169	0.3%	1,045	0.2%
Lake Erie	1,210	1.7%	1,213	2.0%	1,123	6.3%
London	1,318	5.8%	1,535	6.1%	1,419	4.7%
Marion	1,570	2.9%	1,634	2.9%	1,431	3.2%
Northeast	1,755	12.4%	1,734	9.1%	1,431	8.9%
Noble	1,694	1.2%	1,586	2.7%	1,579	3.9%
Pickaway	1,437	6.9%	1,259	5.3%	1,336	12.4%
Richland	1,645	8.6%	1,671	7.4%	1,529	5.9%
Southeast	1,217	1.0%	1,076	0.7%	1,053	1.5%
Level 1/2 Average		4.8%		4.3%		5.1%
DRC Average		4.9%		5.5%		5.3%
Program Drug Testing	646	5.1%	547	3.8%	429	7.0%
For Cause Drug Testing	287	27.2%	220	42.3%	251	50.6%

19.6% of the offender survey respondents indicated that drugs were not available at the institution. In response to CIIC’s survey question pertaining to prohibited substances, the top substances offenders reported as available were suboxone (37), alcohol/hooch (35), and marijuana (27).

What type of prohibited substances are available at this institution?

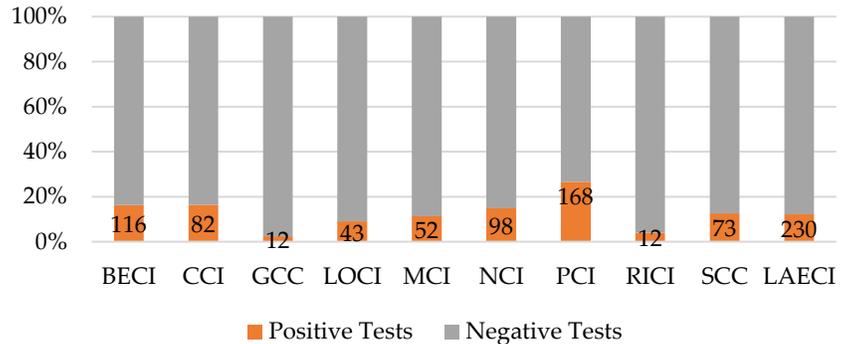


LAECI Drug Usage/Conveyance



Convictions for Rules 39 (possession and consumption) and 40 (conveyance) are graphed for LaECI for 2017-2020 to date.

2019 Drug Testing Results



The results from the 2019 state-wide administered facility drug tests are graphed above for all DRC level 1/2 institutions

OFFENDER PERCEPTION OF SAFETY: GOOD

Evaluation of offender perception of safety focuses on survey responses and the number of refusals to lock for personal safety reasons.

Offender Survey Question(s)	Safe or Neutral	Total Number of Respondents	Change from Previous Inspection
Do you feel safe/neutral/unsafe from other inmates here?	65.6 %	N=93	-20.5%

There were 40 offenders charged with violations of Rule 23, “Refusal to accept an assignment or classification action” in TPU. This is nearly double from the previous inspection in 2018, when there were 21 offenders. Offenders refuse to lock many times due to threats, debts, concerns for safety, etc. An offender can request protective control, but a risk to their safety must be substantiated. One offender was requesting protective control at the time of inspection.

UNIT SECURITY MANAGEMENT: GOOD

Evaluation of unit security management focuses on policy compliance for officer rounds, documented shakedowns, cell/bunk security, and security classification/ privilege level reviews.

Officer Rounds

Officers were consistent in documenting security rounds in the requisite 30 minute, staggered intervals.

Cell/Bunk Searches (Shakedowns)

Housing unit officers are required to search offenders’ bunks/cells for contraband, including drugs and weapons. Officers were consistent in the documentation of shakedowns. Cell³ and bunk⁴ security checks indicated good security and visibility.

INSTITUTIONAL SECURITY MANAGEMENT: GOOD

Security Classification

Unit staff are required to conduct reviews of offenders’ security classification to ensure proper institutional placement. There were four overdue security classification reviews on the day of the inspection. All were accounted for, as three were out to court and one had been released.

Evaluation of security management focuses on: executive staff rounds, critical incident management, STG management, and escapes.

Escapes

There have been no escapes or attempted escapes from 2017 to 2019.

Violent Incident Management

Officer survey respondents and those interviewed reported that they generally feel informed when beginning their shifts. Interviewed officers reported that they receive briefs by word-of-mouth, emails, and a briefing phone line. This practice allows for critical information to be communicated for awareness.

STG Management Institution	2017			2018			2019		
	# of STG Offenders	% of Gen. Pop.	Rule 17 Violations	# of STG Offenders	% of Gen. Pop.	Rule 17 Violations	# of STG Offenders	% of Gen. Pop.	Rule 17 Violations
Belmont	298	11%	24	288	10%	28	325	12%	25
Chillicothe	256	9%	8	290	10%	8	299	11%	12
Lake Erie	223	12%	15	189	10%	16	214	12%	30
Grafton	137	7%	7	102	6%	2	141	8%	3
London	257	11%	20	270	11%	14	271	12%	1
Marion	291	13%	28	312	12%	9	329	13%	23
Noble	245	10%	26	272	10%	31	297	12%	56
Pickaway	219	10%	10	255	12%	7	267	13%	5
Richland	421	16%	25	503	19%	53	392	15%	30
Southeastern	196	10%	25	205	13%	21	252	16%	54

As of November 2020, there were 164 STG-affiliated offenders, which was 11% of the institutional population. The percentage of STG-affiliated offenders ranged from 10% to 12% since the last institution inspection. The rate of rule 17 (unauthorized group activity) convictions⁵ increased 87.5% since 2018. The rule 17 convictions were 15 in 2017, 16 in 2018, and 30 in 2019.

A review of STG committee meetings for the past six months indicated meetings are being held and included the required staff. There was one overdue security threat group classification review, which are done at the monthly STG meetings. The offender respondents who identified gang activity as an occurrence indicated that threats, assaults, and extortion were the most common activities.

PRISON RAPE ELIMINATION ACT (PREA): GOOD

Evaluation of the institution’s compliance with the Prison Rape Elimination Act (PREA) focuses on a review of the most recent PREA audit report, education and awareness of reporting, the number of reported incidents, and offender responses.

PREA Management

The 2019 Internal Management Audit found no Ohio PREA related standards in non-compliance. The facility met 39 and exceeded 6 standards on its August 2018 PREA audit.⁶ There were concerns noted on the inspection regarding risk assessments completed after an offender had been out to court or left the facility.

Corrective action was taken to implement a more thorough screening upon return to the facility. All staff completed PREA training with the exception of those on extended leave. An interview with the institution’s PREA Coordinator explained the process that the institution uses to monitor offenders identified as victims or potential victims and abusers.

Staff reported there were 12 PREA cases in CY 2019, of which one was an allegation against a staff member and 11 were allegations against another offender.

Investigations/Allegations	2017	2018	2019
Total Alleged Incidents	5	15	12
Outcomes	4 Unsubstantiated 1 Unfounded	9 Unsubstantiated 6 Substantiated	7 Unsubstantiated 2 Unfounded 3 Substantiated

Offender Survey Question(s)	Yes	Total Number of Respondents	Change from Previous Inspection
<i>Have you been harassed or threatened by other inmates here?</i>	53.2%	N=94	+25.8%
<i>Have you ever been abused by inmates here?</i>	26.1%	N=92	+12.0%
<i>Have you been harassed or threatened by staff here?</i>	44.9%	N=89	-8.2%
<i>Have you ever been abused by staff here?</i>	18.5%	N=92	+1.9%
<i>Do you know how to report sexual harassment or abuse?</i>	83.0%	N=88	-4.0%

Offenders that reported they had been harassed or threatened by other offenders reported the most common form was “having commissary/property taken”. Those that reported harassment or threats by staff reported the most common as “insulting remarks” and “multiple shakedowns”. Offenders that reported they had been abused by other offenders all reported it was mostly physical abuse (26), and some sexual (7). Those that reported abuse by staff reported mostly physical abuse (13) and some sexual abuse (6).

HEALTH & WELLBEING: GOOD

Expectation: Prisons will provide sanitary conditions and access to adequate healthcare and wellness programming.

HEALTH & WELLBEING	2018	2020
	GOOD	GOOD
<i>Unit Conditions</i>	<i>Good</i>	<i>Good</i>
<i>Medical Services</i>	<i>Good</i>	<i>Good</i>
<i>Mental Health Services</i>	<i>Good</i>	<i>Good</i>
<i>Recovery Services</i>	<i>Good</i>	<i>Good</i>
<i>Food Services</i>	<i>Good</i>	<i>Good</i>
<i>Recreation</i>	<i>Acceptable</i>	<i>Good</i>

KEY FINDINGS

Medical services were found in non-compliance with Ohio Standards and DRC Policy in their recent audit. Offenders on the mental health caseload moved into one unit to allow services to continue during COVID-19.

Offender satisfaction with food services has increased since the prior inspection.

Recreation offers music and arts programs to the offender population.

UNIT CONDITIONS: GOOD

Evaluation of unit conditions consists of direct observation of housing areas.

On-Site Observations

A tour of Ontario C&D housing units was conducted at the time of the inspection. All dayrooms/common areas were “good” based on the cleanliness of the floors and their overall appearance. The dorm conditions were also rated as “good” with no visible issues. Shower conditions were rated as “good”.

No maintenance issues were relayed by unit staff, and they stated that maintenance requests are fulfilled in a timely manner when they do occur. All the drinking fountains, ice machines, phones, and laundry facilities were reported to be operational. Cleaning materials were appropriately secured.

MEDICAL SERVICES: GOOD

Evaluation of medical services is comprised of a nurse focus group, a conversation with the Health Care Administrator, and a tour of the medical facilities.

Facilities

The medical facilities were observed to be in good condition. The facility is reported to have sufficient space for staff to conduct clinical duties. Staff relayed that it would have been beneficial to have additional space during COVID-19, for quarantining needs. The sanitation practices have reportedly increased during COVID-19, to include high-touch areas and common areas on a high frequency.

Staffing

The facility appears to have a sufficient number of medical staff. The facility had one healthcare administrator, one clinical supervisor, two nurse practitioners, three licensed practical nurses, 11 registered nurses, one doctor, and three health information technicians. Additionally, there is a phlebotomist, a part time diet tech, three part time

radiology techs, and a part time optometrist. Dental staff consists of a full time dentist, part time dentist, two dental assistants, and a part time hygienist. There were two registered nurse vacancies at the time of the inspection. The Healthcare Administrator reported these vacancies have persisted due to scheduling and the nurse shortage experienced during COVID-19.

A focus group of nurses was held virtually and relayed the following takeaways. Staff felt that they provide quality care to offenders and have a professional, respectful rapport with most. Nurses were split when answering if they felt supported by supervisors. Nurses had concern with access to supplies and quality equipment. There were also challenges presented with offenders being called over for appointments, causing delays and inefficiencies.

Sick Call & Chronic Care

Number of Offenders seen in Last Six Months

<i>Nurse Sick Call</i>	1,884	<i>Doctor Sick Call</i>	1,051
<i>Chronic Care Caseload</i>	635	<i>CC Appointments</i>	757

Quality

An internal management audit was conducted June 2019 and found four Ohio standards related to medical services in need of improvement. Medical auditors made multiple observations and found violations of DRC policy.

Medical staff relayed that they participate in quarterly interdisciplinary meetings, which is in compliance with DRC policy. The QIC is a part of patient satisfaction meetings quarterly, which is in compliance with DRC policy. There have been three offender deaths from 2017-2019.

Offender Survey Question(s)	Satisfied or Neutral	Total Number of Respondents	Change from Previous Inspection
<i>How satisfied are you with the quality of the care you get from the nurses?</i>	62.6%	N=91	-2.2%
<i>How satisfied are you with the quality of the care you get from the Doctor/ALP?</i>	60.7%	N=84	-3.7%
Within 2 days			
<i>On average, when do you see the nurse after filing a health service request (sick call slip)?</i>	42.5%	N=87	+2.3%
Yes			
<i>If you are on the chronic care caseload, do you see medical regularly?</i>	48.9%	N=47	-4.8%

MENTAL HEALTH SERVICES: GOOD

Evaluation of mental health services focuses on cleanliness of facilities, staffing, access to mental health staff, programming, and critical incident data in addition to quality of services.

Caseload

<i>Total</i>	281	<i>C1 / Seriously Mentally Ill (SMI)</i>	99
<i>Offenders on Medication</i>	70	<i>On Mandated Medications</i>	0

Access to Mental Health⁷

355 kites have been processed in the last six months. 180 referrals have been made to mental health for services. Office hours are offered to offenders during normal business hours, and other staff are available when mental health providers are not present on grounds. Staff in other departments are provided with information of offenders considered intellectually disabled, those at high-risk, and all those on the mental health caseload. When COVID-19 restrictions were put in place, those on the mental health caseload were moved to a single dorm to allow for services to still be provided while decreasing contamination between units. Non-urgent appointments were postponed, and self-help materials were provided to stay engaged with offenders.

Staffing

Staffing levels included a mental health administrator/psychologist, part time psychiatrist, part time APN-MH, part time mental health specialist, a registered nurse, social worker, independently-licensed social worker, and health information technician. There were no vacancies at the time of inspection.

Programming

LaECI offers a modest range of mental health programming for offenders. At the time of the inspection, three group programs were offered by staff: Seeking Safety, Depression Bright, and Chronic Mental Illness. Group sessions were suspended at the beginning of COVID-19 restrictions, but have since resumed with decreased numbers of participants to allow for social distancing.

Suicide Attempts / Critical Incidents

There have been no completed suicides from 2017-2019. Six attempts were made and 16 instances of self-injurious behavior occurred. The facility routinely utilizes crisis intervention strategies to diffuse offender concerns. From 2017-2019, there have been 363 uses of constant watch and 228 uses of observation status.

Quality

A full internal management audit was conducted in June 2019. The auditors relayed no concerns nor observations relating to mental health services.

Offender Survey Question(s)	Satisfied or Neutral	Total Number of Respondents	Change from Previous Inspection
<i>Overall, how satisfied are you with the quality of the care you get from Mental Health?</i>	48.3%	N=58	-20.7%

RECOVERY SERVICES: GOOD

Evaluation of recovery services focuses on cleanliness of facilities, staffing, participation of offenders, and access.

Facilities

The recovery service facilities were noted to be clean and organized. The staff report they have sufficient space for staff to conduct clinical duties. There is not a housing unit dedicated to recovery services.

2020. There were two counselors and one supervisor. When COVID-19 restrictions are not in place, ten volunteers from the community are used to facilitate AA/NA programming.

Staffing

Staffing levels appear currently low, yet improving, to provide recovery service programming. There were two staff vacancies at the time of the inspection, with them expected to be filled by the end of November

Participation and Outreach⁸

Programming is currently being conducted with reduced numbers of participants to allow for social distancing. Nine programs have been conducted in

the last six months, serving 57 participants, combined. LaECI staff reported that in 2019, the IOP three-phase program had a 97% completion rate, which is exceptional retention. LaECI recovery service department offers programming to include: Intensive Outpatient Program and Brief Intervention Program. LaECI reported 62 offenders are currently assessed, with 350 on the waitlist. When COVID-19 cohorting restrictions are not in place, the recovery service

department does reach out to offenders who are found guilty of Rule 39's⁹ for intervention programming. Staff reported 5,983 offenders attended open NA/AA meetings in 2017, 6,372 in 2018, and 6,445 in 2019.

Staff relayed multidisciplinary meetings occur quarterly through the QIC (Quality Improvement Committee) process which is within policy.¹⁰

Offender Survey Question(s)	Yes	Total Number of Respondents	Change from Previous Inspection
<i>Do you feel you are able to get into Recovery Services Programs?</i>	33.8%	N=65	-11.8%

FOOD SERVICES: GOOD

Evaluation of food services included eating the offender meal, an observation of the dining hall, food preparation area, the loading dock, interview with the Food Service Manager, and a documentation review.

Dining Hall

The tables and the floor of the camp dining hall were clean and clear of debris. The serving lines were also clear of food particles.

Meal

The meal sampled by CIIC was rated as good. The portion sizes were sufficient and the quality of the main entrée was good. Temperatures were appropriate.

Inadequate menu substitutions reportedly never occur. Additionally, no delayed servings were reported.

Kitchen and Food Preparation Area

The kitchen floors were clear of any excess food particles and debris. Cooking equipment appeared clean while in use, and stored equipment was clean and orderly. The freezers and coolers appeared to be in good condition and there were no maintenance concerns. Staff reported that maintenance concerns are addressed quickly and handled in-house by maintenance whenever possible. Staff relayed that equipment is sanitized after every use and the preparation area is cleaned on a regular daily and

weekly basis. Sanitation has increased heavily during the response to the Coronavirus.

Offender Work Programs

Staff reported there are currently 138 offender food service workers. Offenders earn \$24 incentive pay each month in addition to their state pay.

Food Service Contract Staff

The food service contract staff consisted of 12 employees including one director, three assistant directors, and eight hourly workers.

Pest Control

Staff relayed that the exterminator visits the facility monthly and as needed. Pest issues are not a concern currently, with the most recent occurrence being fruit flies in the summertime.

Food Service Management and Oversight

In their most recent contract evaluation from the DRC in March 2020, LaECI received a compliance score of 97%. The main area of non-compliance was staffing. In their most recent health department inspection on December 2, 2019, the institution

passed with one standard in non-compliance. The concern was regarding a small amount of mold on

the wall in the dish washing room. This was corrected during inspection.

Offender Survey Question(s)	Satisfied or Neutral	Total Number of Respondents	Change from Previous Inspection
<i>How satisfied are you with the food in the chow hall?</i>	35.1%	N=97	+14.4%

RECREATION: GOOD

Evaluation of recreation is based on three factors: facilities, activities, and access.

Facilities

Physical facilities¹¹ appeared clean. The institution has one inside and outside area for recreation. There were no maintenance concerns during the inspection.

Activities

Offenders are offered a good variety of activities for recreation, including craft oriented programming. Overall, the recreation department offers a majority of recreation activities permitted, per policy, for Level 1/2 offenders.¹² Movies are made accessible and are rotated frequently.¹³ Music programming is made available through the Chapel, which shares a space with the recreational facilities.

Currently, through their arts program they are doing an airbrushing community service project. The project consists of airbrushing giant wood cards

that are put on display in the city. Previous projects have included making yarn stuffed animals to be donated to children.

Access

Prior to COVID restrictions, the recreation department held open rec during the day and three dorms were scheduled to recreate at night. Currently, a maximum of two cohorts are able to recreate indoors and outdoors. Additionally, games such as BINGO are made available to offenders. The recreation department has been innovative in trying to maintain recreational operations amidst operational changes.

Staff noted that the biggest challenge affecting recreation is space. The department also shares room with the chapel so access to some activities including pool and video games have been affected.

Offender Survey Question(s)	Satisfied or Neutral	Total Number of Respondents	Change from Previous Inspection
<i>How satisfied are you with recreation?</i>	35.8%	N=95	-14.2%

FAIR TREATMENT: GOOD

Expectation: Prisons will provide fair and professional treatment of offenders.

FAIR TREATMENT	2018 GOOD	2020 GOOD
Staff/Offender Interactions	Good	Good
Inmate Grievance Procedure	Good	Good
Transitional Programming Unit	Good	-
Offender Discipline	In Need of Improvement	Good

KEY FINDINGS

While response times to complaints and grievances have improved, they are, on average, outside of policy.

No procedural errors were found in RIB cases, which was a concern noted in the previous inspection.

STAFF / OFFENDER INTERACTIONS: GOOD

Evaluation of staff/offender interactions is based on a survey of offenders.

Offender Survey Question(s)	Yes	Total Number of Respondents	Change from Previous Inspection
On most days, are your housing unit officers professional?	47.8%	N=90	-10.4%
On most days, are your housing unit officers helpful?	39.6%	N=91	-18.7%
Have you been harassed or threatened by staff here?	44.9%	N=89	-8.2%
Have you ever been abused by staff here?	18.5%	N=92	+1.9%

INMATE GRIEVANCE PROCEDURE (IGP): GOOD

Evaluation of the inmate grievance procedure¹⁴ includes an interview with the Inspector of Institutional Services, a review of a random sample of informal complaints and grievances, offender survey responses, and data analysis.

Access

The Inspector relayed that orientation is conducted with new staff and offenders to educate on the grievance procedure. The inspector stated that they make themselves available to offenders during chow for two hours each day. Inspector’s report logs reflected inspector rounds being conducted in a variety of areas, to include housing units, medical, property vaults, and disciplinary housing. The inspector relayed that no offenders were currently on grievance restriction.

Informal Complaints

Year	Filed	Average # of Days to Answer	Untimely
2018	2,274	25.34	146 (6.4%)
2019	2,136	15.68	161 (7.5%)*

**The facility reports that there is a discrepancy between data provided by Central Office and Lake Erie. The facility reported a 2.24% untimeliness in 2019 Informal Complaint Responses.*

The Inspector relayed that they do contact staff and monitor informal complaint responses closely to ensure they are timely. A review of ten informal complaint responses for timeliness, investigation, and professionalism was

completed. The responses all provided explanations of the materials reviewed and professionally addressed the complaints.

Grievances

Year	Filed	Average # of Days to Answer	Untimely
2018	563	69.62	56 (9.9%)
2019	694	35.87	66 (9.5%)*

*The facility reports that there is a discrepancy between data provided by Central Office and Lake Erie. The facility reported a 0.0% untimeliness in 2019 Grievance Responses.

The Inspector relayed that the most frequent grievance topics are relating to property, mail, and healthcare. There were no offender grievances filed in the past year for staff retaliation that were substantiated.

A review of ten grievance responses for timeliness, investigation, and professionalism was completed. The responses all provided explanations of the

investigations or evidence reviewed and professionally addressed the complaints.

Oversight and Accountability

The LAECI Inspector indicated that he does attend executive staff meetings, where informal complaint and grievance trends are discussed. The Inspector speaks with staff from all areas to work to improve conditions prior to them becoming grievances.

Offender Survey Question(s)	Yes	Total Number of Respondents	Change from Previous Inspection
<i>Do you know who the inspector is?</i>	34.4%	N=96	+3.2%
<i>Are you able to get the following: Informal Complaints?</i>	69.0%	N=87	-0.6%
<i>Have you ever felt that staff would not let you use the grievance procedure here?</i>	44.0%	N=91	+6.5%
<i>Do you feel that the following are handled fairly at this institution: Informal Complaints?</i>	9.0%	N=67	-4.5%
<i>Do you feel that the following are handled fairly at this institution: Grievances?</i>	10.8%	N=65	+3.6%

Offender survey respondents who reported that they had not used the grievance procedure noted that the top two reasons were “No problems/reason to use” (30), closely followed by “Grievance procedure does not work” (28) and “Staff retaliation” (26).

OFFENDER DISCIPLINE: GOOD

Evaluation of offender discipline¹⁵ includes observation of Rules Infraction Board (RIB) hearings and a review of a random sample of closed RIB cases.

Caseload

The most frequent rule violations referred to RIB in 2019 were rules 19 (fighting) and 39 (possession/consumption), of the Inmate Rules of Conduct. Staff reported there were no issues with backlog. There were 7,746 conduct reports submitted in 2019, which was a 31.8% increase from 2018, which had 6,588. In 2019, 376 conduct reports were for drug or alcohol related offenses and 237 were for fighting or instigation of a fight.

Procedures

The RIB panel followed standard hearing procedures.¹⁶ Panel members reviewed relevant evidence during the hearing. Staff relayed that they review camera footage for conduct reports such as fights and assaults. They additionally will review statements, photographs, or medical exams, when appropriate for the case.

Due Process

In the 39 closed case reviews, 13 offenders were on the mental health caseload and were screened by mental health staff prior to the RIB hearing, per policy. No cases requested witnesses in the cases reviewed. Fifteen offenders requested appeal forms and received them. The inmate rights form was completed for all cases.¹⁷

Sanctions

The progressive discipline process was explained by the Rules Infractions Board Chairperson and the reasons for not following progressive discipline on

serious cases was explained. Discipline for first-time offenders appeared appropriate.

TPU Population

According to the TPU roster¹⁸, there were 94 offenders assigned to disciplinary housing. Of the 94, 22 offenders were on the mental health caseload, including six considered severely-mentally ill (SMI). There were 40 offenders charged with violations of Rule 23, "Refusal to accept an assignment or classification action" in TPU. Offenders refuse to lock many times due to threats, debts, concerns for safety, etc. An offender can request protective control, but a risk to their safety must be substantiated. One offender was requesting protective control.

Programming/Activities

Mental Health staff conduct weekly rounds and evaluations of offenders. Medical staff are a consistent presence on the unit and conduct rounds daily. Medical services made rounds per policy and delivered prescribed medication to each cell.

Conditions

Overall, the common areas of the TPU were rated good. Staff relayed that there were no inoperable cells on the day of the inspection.

The use of an alternative meal ("food loaf"), which is meant to be nutritional but used for improper behavior related to misuse of eating utensils and trays, was reported as not being utilized in the six months prior to inspection.

REHABILITATION & REENTRY: GOOD

Expectation: Prisons will provide access to quality programming and purposeful activities that will ultimately aid reentry.

REHABILITATION & REENTRY	2018	2020
	GOOD	GOOD
<i>Reentry Planning</i>	<i>Good</i>	<i>Good</i>
<i>Rehabilitative Programming</i>	<i>Good</i>	<i>Good</i>
<i>Family Engagement & Community Connections</i>	<i>Acceptable</i>	<i>Acceptable</i>
<i>Academic Programming</i>	<i>Good</i>	<i>Good</i>
<i>Library Services</i>	<i>Good</i>	<i>Good</i>
<i>Vocational & Work Skill Development</i>	<i>Exceptional</i>	<i>Exceptional</i>

KEY FINDINGS

COVID-19 precautions have greatly impacted the facility’s ability to facilitate programming.

Completion numbers for 2019 reentry-approved programming were low.

Lake Erie has its own rehabilitative program, Go Further, to address offenders’ specific reentry needs.

There are a high number of offenders enrolled in apprenticeship programs.

There were a high number of vocational program completions in 2019.

REENTRY PLANNING: GOOD

Evaluation of reentry planning¹⁹ includes interviews of staff, document review, and survey responses.

Staff Accountability

Unit staff consists of a Unit Management Administrator, three Unit Managers, four Case Managers, and two Sergeants. Case managers are expected to facilitate reentry approved programming, as well as meaningful activities.

purposeful activity are current COVID-19 restrictions. Prior to COVID-19, the facility was able to offer more programs and hold larger group sizes.

Reentry Resources

Staff relayed they conduct resource and job fairs each year to provide offenders with community contacts. Staff relayed that barriers for offenders to access

Staff attend reentry coalition meetings for one local county, currently attended virtually. Location is also reported to be a barrier, as the prison is distant from many communities that offenders return to. Many local agencies would come into the facility to provide job skills and placement, though this is currently ran through teleconferencing methods.

Offender Survey Question(s)	Yes	Total Number of Respondents	Change from Previous Inspection
<i>Do you know where you can find reentry information?</i>	61.1%	N=90	-8.6%

REHABILITATIVE PROGRAMMING: GOOD

Evaluation of rehabilitative programming is based on a review of unit-based program enrollment and completion, on-site observations, and review of additional purposeful activities.

Unit-Based Programs

LaECI currently has four Reentry Approved programs able to be facilitated by unit staff at the time of this site visit. Additional reentry programs include: Roots of Success, TOPUCU, Tyro Career Education, Edwins Culinary Club, Empowerment, and Go Further. Meaningful programs led by staff or offenders (with staff supervision) are also offered to the population.

A program specific to LaECI, Go Further, is based on the metaphor of a highway, using the “on-ramp” to determine what the offender’s needs are for placement in appropriate programming. Then they are on the “highway” of their journey to the “off-ramp” of reentry. Rest stops along the way allow for breaks and detours are expected set-backs. Staff relay that this metaphor gives a greater understanding of the reentry process.

Program	Waitlist	Enrollment	2019 Completions
<i>Thinking for a Change</i>	51	0	4
<i>Inside Out Dad</i>	41	2	12
<i>Victim Awareness</i>	42	0	25
<i>Decision Points</i>	25	1	0

Offender Survey Question(s)	Easy or Neutral	Total Number of Respondents	Change from Previous Inspection
<i>How easy or difficult is it to get into the following activities in this prison? Unit Programs</i>	37.5%	N=80	-19.7%
Yes			
<i>Have staff talked with you about what programs to take while incarcerated?</i>	28.9%	N=90	-2.5%

FAMILY ENGAGEMENT & COMMUNITY CONNECTIONS: ACCEPTABLE

Evaluation of family engagement and community connections consists of review of family-oriented activities, survey results, and data review.

LAECI promotes offender communications with family, friends, and community through mail, email, phones, free envelopes, and programs.

not prohibited by COVID-19 restrictions. The areas where volunteers are active are religious services, recovery services, and unit programs.

LAECI reported 45,230 community service hours for 2019. 2018 had 47,611 hours, and 2017 had 45,449. LAECI reported having 161 active volunteers, when

Staff relayed that activities to enhance community support have been Reentry Coalition Meetings and local agency involvement within the facility.

Offender Survey Question(s)	Yes	Total Number of Respondents	Change from Previous Inspection
Have you had any problems with mail?	63.9%	N=97	+7.9%
Have you had any problems with telephones?	75.8%	N=95	+4.0%
Have you had any problems with visitation?	54.3%	N=94	-5.0%

ACADEMIC PROGRAMMING: GOOD

Evaluation of the quality of academic programming focuses on data analysis, a document review, direct observation of at least one program, and offender survey responses.

LAECI education department consists of one principal, an assistant principal, a counselor, an education specialist, eight academic teachers, five career-tech teachers, and an advanced job training instructor. There is currently no vacancies in the education department. The average ratio of student to academic is 6 to 1 and career/tech teachers is 9 to 1.

Education classrooms appeared to be in good condition. LAECI reported having 16 offender tutors trained to assist others with academic work. For lower-level classes such as ABE the tutor ratio is 1 to 1 but for higher level courses there are approximately two tutors per class. Currently, the department holds a "One Hour of Power" tutoring session in which students can sign up for small group tutoring.

LAECI education department offers Pre-GED, GED, ABLE, Literacy, Special Education, Title 1, career technical education/career enhancement program, advanced job training, and apprenticeship programs.

Monthly reporting reports dated September 2020 indicated that the institution had 26 offenders complete academic programs, and seven complete career tech programs year-to-date²⁰. The institution reported having 220 apprenticeship enrollments for the month of September. Reading room hours for the

children’s reading room in visiting are not currently being reported on the Educational Monthly Report, but have been in the past, per policy²¹.

The department reported in the past having a celebratory events to commemorate those who have obtained their GED. These events are usually hosted by the Warden, with a barbeque and family. Additionally, the department recognizes students who have done an exemplary job with rewarding them as *Student of the Month*.

Earlier in the year when education was shut down, students were receiving weekly packets to complete. Now, students meet in-person for two hours once a week for academic classes and two to three times a week for vocational classes. For days not spent in class, packets are provided.

Some difficulties have presented themselves with scheduling due to the cohort structure but the situation has been remedied with the utilization of passes so students are able to attend classes held.

Several classes were occurring during the time of the inspection. Offenders were engaged and interacting positively with the instructors.

Offender Survey Question(s)	Easy or Neutral	Total Number of Respondents	Change from Previous Inspection
How easy or difficult is it to get into the following activities in this prison? Academic Programming	39.0%	N=82	-5.1%

LIBRARY SERVICES: GOOD

Evaluation of literacy development focuses on data analysis, a document review, and interview responses.

Library Facilities

The library appeared organized and clean. The staff reported that the library currently has a seating capacity of approximately 187 offenders.

The total computers in the LAECI library is 18; ten Lexus nexus, eight word processors, two Ohio Means Jobs computers and six typewriters with no maintenance required.

The library did reflect secondary educational, ethnic section materials and popular books in Spanish.

The library advisory meeting was held on October 29, 2020 with various staff in attendance such the Deputy Warden of Special Services, the Principal, the Inspector, the Librarian, and a Unit Manager

Library Access

Currently, due to COVID-19 restrictions full library services are unavailable. Offenders may kite the librarian for necessary materials and have access to the law library on their GTL tablets. Prior to this, schedules’ reflects four evening library sessions and weekend hours which is in compliance with departmental policy.²²

The staff reported that rounds are conducted every week to the Transitional Program Unit (restrictive housing and limited privilege housing unit)²³. Offenders could also kite the library if items were needed while in TPU.

The librarian reported that complaints received recently regarding the library were access to computers due to the low number in comparison to the population.

VOCATIONAL & WORK SKILL DEVELOPMENT: EXCEPTIONAL

Evaluation of the quality of vocational and work skill development and programming focuses on data analysis, a document review, and offender survey responses.

Program	Waitlist	Enrollment	2019 Completions
AOT	23	16	101 Combined Completions
CAD	10	10	
Construction Tech	15	17	
Electronics	22	6	
Drywall	9	16	

Programming

LAECI offers five vocational programs: AOT, CAD, Construction Tech, Electronics and Drywall with a combined 65 offenders enrolled. LAECI currently has 207 offenders enrolled in the following Apprenticeship programs: Alteration Tailor, Animal Trainer, Baker, Electrician/Maintenance, Film and Video Editor, Health Care Sanitary Tech, HVAC, Janitor, Landscape Management Tech., Material Coordinator, Plumber, Recovery Operator, and Welder.

Offender Survey Question(s)	Easy or Neutral	Total Number of Respondents	Change from Previous Inspection
<i>How easy or difficult is it to get into the following activities in this prison? Vocational Programming</i>	30.9%	N=81	-0.9%

FISCAL ACCOUNTABILITY: DEFERRED

Expectation: Prisons will responsibly utilize taxpayer funds and implement cost savings initiatives where possible.

FISCAL ACCOUNTABILITY	2018 GOOD	2020 DEFERRED
<i>Fiscal Wellness</i>	<i>Acceptable</i>	<i>Deferred</i>
<i>Environmental Sustainability</i>	<i>Good</i>	<i>Deferred</i>
<i>Staff Management</i>	<i>Good</i>	<i>Good</i>

Due to the privatization of this facility, CIIC is unable to obtain certain fiscal information pertaining to the areas usually evaluated in this section from the institution including: facility budgets, fiscal audits, overtime management, future infrastructure renovation plans and staffing demographics. As a result of this, the CIIC **deferred** the rating of *Fiscal Accountability* for LAECI.

FISCAL WELLNESS: DEFERRED

Evaluation of fiscal wellness includes a document review of the institution budget status report, fiscal audits and an interview of staff regarding the implementation of cost saving initiatives, both those required by policy and those independently developed by staff.

ENVIRONMENTAL SUSTAINABILITY: DEFERRED

Evaluation of environmental sustainability includes a document review of the utility bills and an interview of staff regarding the implementation of cost saving initiatives, both those required by policy and those developed by staff.

STAFF MANAGEMENT: GOOD

Evaluation of staff management includes a data review and staff interviews regarding overtime management, turnover ratio, morale, training, and evaluations.

Workplace Environment

CIIC interviewed 10 correctional officers who provided the following insight regarding the LaECI workplace environment: Most officers rated both staff and offender safety as “Average to very high” on a 5-point scale. Some feedback on how to make the facility safer was hiring more officers. Staff morale was rated as “very low,” which staff attributed to the consistent overtime and stress of dealing with COVID.

The FY 2020 LaECI mandated training completion rates consisted of the following:

- CPR/First Aid²⁴: 84.7%
- Defense Tactics: 91.7%
- E-Learning: 100%
- OC-Spray 100%
- Firearms 100%
- PREA 100%

Evaluations

In CY 2018, LaECI staff completed 100% of their 224 performance evaluations.

Vacancies

On the day of the inspection, LaECI reported 14 new staff members were scheduled to begin work within the following month. Ten of these were for correctional officer positions.

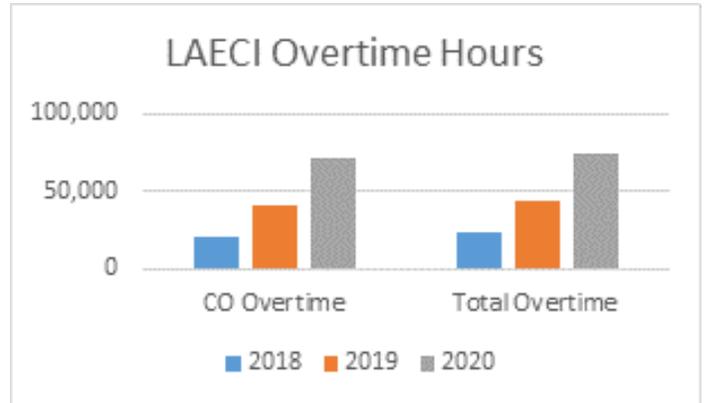
Training

Recruiting and Retention Initiatives

According to staff, CoreCivic handles most of the recruiting but they also attend job fairs and have been posted in the Erie Pennsylvania Times newspaper. They have also have attended virtual job fairs.

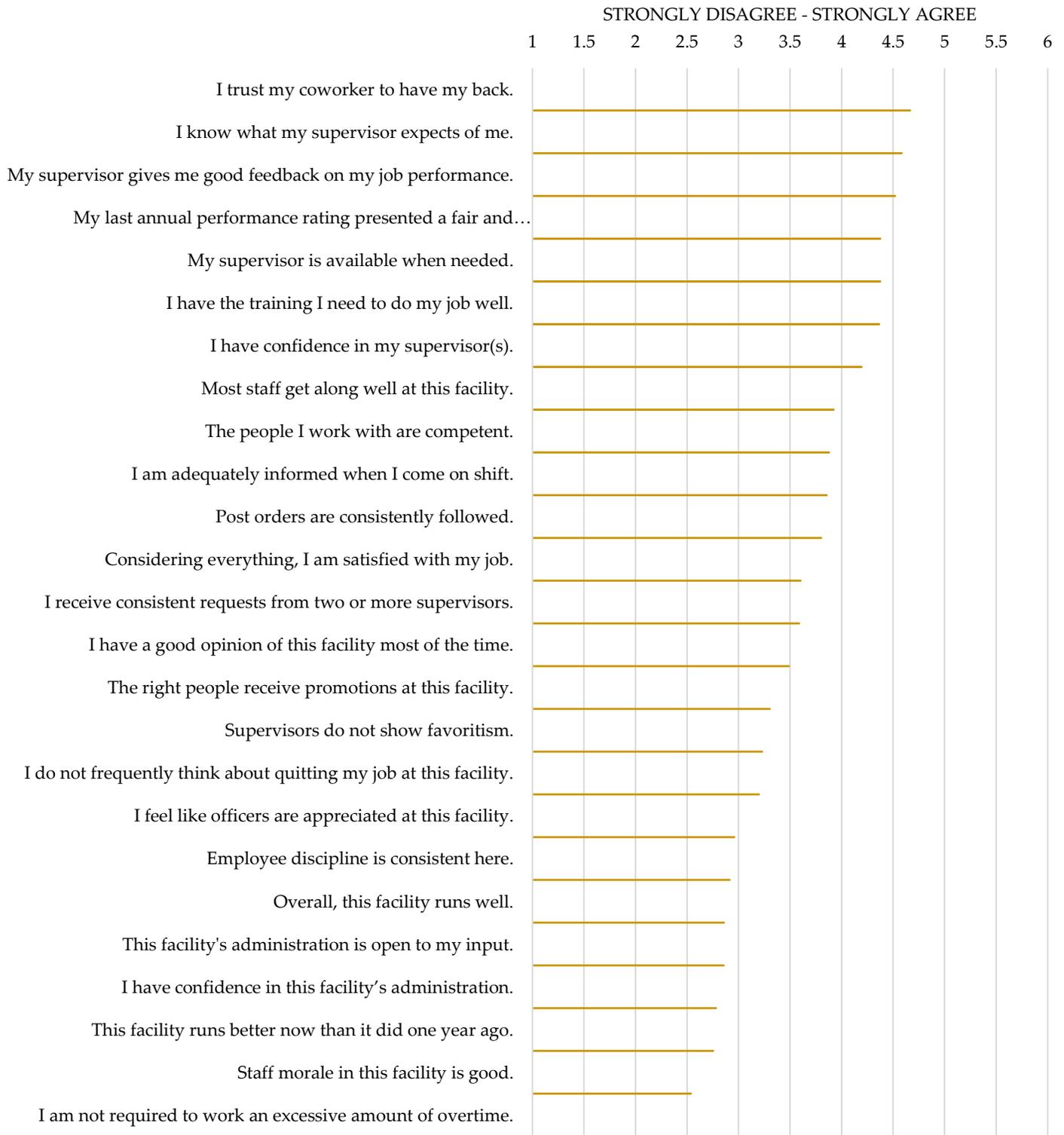
Staff relayed that new recruits are given coaches and they also have a Women in Corrections group at the facility. The main problem that new recruits face are adjusting to the correctional environment and the abnormality of the hours from the standard 9-5pm schedule but having a coach can help with this adjustment.

Overtime

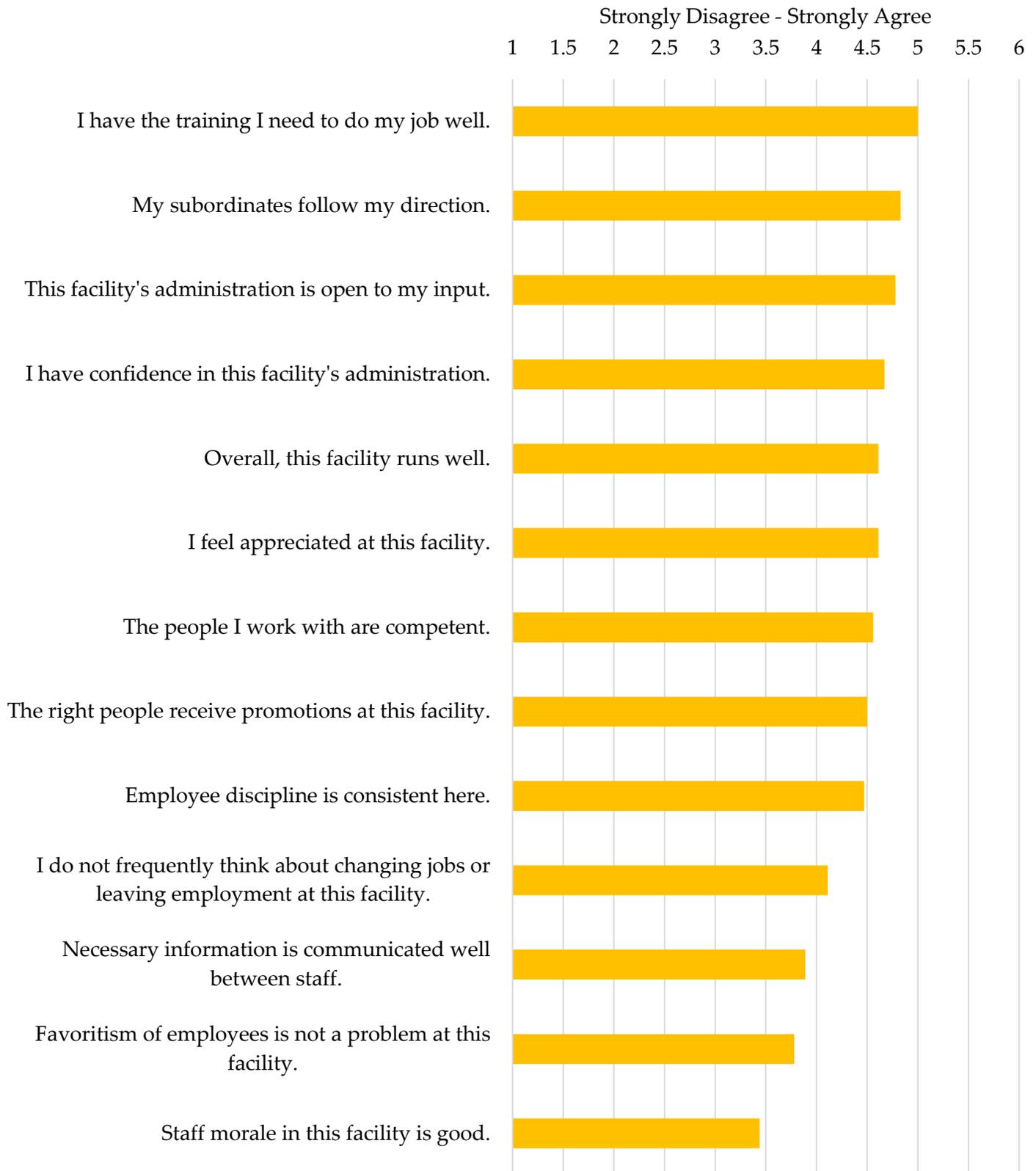


	2018	2019	2020
CO Overtime (Hours)	21,121	40,562	71,607
Total Overtime (Hours)	23,705	44,371	74,562

CIIC received 57 responses back from LAECI correctional officers which represents a sample size of 14.1% of total officers. The survey responses were mostly mixed and indicate that officers have some concerns regarding overtime, morale, and administration.



CIIC received 18 survey responses from LAECI Supervisors. Supervisor survey responses were mostly positive.



¹ The total number of RIB convictions for rule 19 violations does not correlate to a total number of fights. For example, seven offenders might have been involved in one fight – all seven offenders would have been found guilty by the RIB for a rule 19 violation and would therefore be included in the total number.

² Disturbances are defined as any event caused by four or more offenders that disrupts the routine and orderly operation of the prison.

³ During the inspection, a random selection of cells in each unit are checked for common cell security issues such as: obstruction of windows, material in locks, inappropriate pictures, clotheslines, and graffiti.

⁴ During the inspection, bunk areas are checked to identify if offenders are hanging items to block officers' direct observation.

⁵ RIB convictions for rule 17 (unauthorized group activity) violations do not capture total gang activity in an institution, as gang activity likely occurs that is not captured by staff supervision and/or documented via a conduct report and RIB conviction.

⁶ PREA Audit: Auditor's Summary Report Adult Prisons and Jails. Accessed at <https://www.drc.ohio.gov/Portals/0/2019-LAECI%20PREA%20AUDIT%20REPORT.pdf>

⁷ Access to mental health staff is evaluated based on several factors: (1) time period between offender submission of a mental health service request form and appointment with mental health staff; (2) time period between referral and appointment with the psychologist or psychiatrist; (3) response times to kites and informal complaint forms; and (4) current backlogs.

⁸ Each offender is screened using an assessment tool for the need for addiction services, and is assigned a number associated with a recovery services level. This number indicates the degree to which offenders are in need of addiction services. Offenders are scored from zero to three; zero indicating no need of services, to three indicating chronic need for addiction services. This number is determined through completion of a need for services assessment that gives an overall score resulting in the assignment to one of the recovery services levels. Offenders who score either two or three are most in need of treatment; thus, they should be prioritized for programming.

⁹ AR 5120-9-06 defines Rule 39 as unauthorized possession, manufacture, or consumption of drugs or any intoxicating substance.

¹⁰ In accordance with DRC 70-RCV-05, the Quality Improvement Committee shall review quality improvement activities to include utilization review, peer review, clinical review, and credentialing.

¹¹ Indoor recreational facilities consists of a full court gym, weight cage, a multipurpose room and equipment room. The Chapel is located in a large room in recreation.

¹² DRC 77-REC-01 outlines the permissible recreational activities per facility security level.

¹³ During the interview, it was relayed that the institution rotates movies twice weekly.

¹⁴ Pursuant to Section 103.73 of the Ohio Revised Code, the CIIC is required to evaluate the inmate grievance procedure at each state correctional institution. The inmate grievance procedure is a three-step process by which offenders can document and report concerns to multiple levels of DRC staff.

¹⁵ Offenders charged with a rule infraction are given a conduct report (also known as a ticket). All conduct reports are first heard by a hearing officer; if the offense is a minor offense, the hearing officer may dispose of it himself. More serious offenses must be referred to the RIB, which is a two-person panel that conducts a formal hearing, including witness testimony and evidence.

¹⁶ Appropriate procedures includes checking to ensure that the offender had received a copy of the conduct report, checked the inmate rights form, read the conduct report, offered the opportunity for an offender to give his testimony, had the offender leave for deliberation, reviewed evidence and discussed the case with the other panel member, informed the offender of the decision, and offered the opportunity to appeal.

¹⁷ The inmate rights form asks whether the offender waives the 24 hour notice, the presence of the charging official at the hearing, and the presence of any witnesses. The form also asks the staff completing the form whether he or she believes that the offender needs staff assistance.

¹⁸ The roster tracks offenders by disciplinary status, rule violation, the date that the offender came into the TPU unit, mental health status, and STG status. All of this is important information for ensuring the orderly management the population.

¹⁹ Reentry planning requires pervasive attention to individualized details from the first day of incarceration through the post-release period. Effective reentry planning is crucial for a successful reintegration into society. The inspection considers

the amount and types of offender access to unit programs and purposeful activities, offender contact with local community representatives, and staff accountability related to reentry processes and unit life.

²⁰ Ohio Central School Systems runs in conjunction with the fiscal year calendar. FY 2021 began on July 1, 2020. The year-to-date completions are from this date.

²¹ DRC 76-VIS-04 states that reading room coordinators shall submit a monthly report to the Ohio Central School System Literacy Coordinator using the Education Monthly Report Form (DRC2311).

²² DRC 58-LIB-01 states that library services shall be available to the offender population daily to include evenings and weekends, which includes all satellite library locations.

²³ DRC 58-LIB-01 outlines library services and the delivery of those to the Transitional Programming Unit.

²⁴ COVID-19 impacted the ability to complete close-contact training, and only online training courses were permitted.