Washington State Auditor's Office

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Performance Audit

Improving Staff Safety in Washington's Prisons

March 22, 2016

Following the murder of a correctional officer in 2011, the Department of Corrections implemented a series of initiatives designed to improve staff safety. Although our audit found that no other state has developed and implemented such a comprehensive effort to improve staff safety, we also found opportunities for further improvement. While each prison had implemented the initiatives to some degree, not all the initiatives have been fully or consistently implemented in all facilities. The Department could improve staff accountability procedures, visibility in certain areas of the prisons, communication between management and staff, and staff search procedures. We also found the Department has not updated its staffing model to take into account the additional demands placed on staff.

In addition, we found that while the majority of staff we surveyed feel safe, less than half feel safer now than when the initiatives were implemented. The Department's current performance measures lack the specificity needed to understand how well the staff safety initiatives are working. Our recommendations address areas we identified that can help the Department improve the implementation of its staff safety initiatives by providing clarity to staff on expectations; changing its policies, procedures, and practices to further improve staff safety; and developing a more focused approach to evaluating the effectiveness of staff safety related practices.

Audit Number: 1016364

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State Auditor's Office contacts

State Auditor Troy Kelley
360-902-0371, Auditor@sao.wa.gov

Jan M. Jutte, CPA, CGFM – Deputy State Auditor
360-902-0360, Jan.Jutte@sao.wa.gov

Chuck Pfeil, CPA – Director of State & Performance Audit
360-902-0366, Chuck.Pfeil@sao.wa.gov

Lou Adams, CPA – Deputy Director of Performance Audit
360-725-9741, Louella.Adams@sao.wa.gov

Susan Hoffman – Principal Performance Auditor
360-725-5620, Susan.Hoffman@sao.wa.gov

Adam Wilson – Deputy Director for Communications
360-902-0367, Adam.Wilson@sao.wa.gov

To request public records

Public Records Officer
360-725-5617, PublicRecords@sao.wa.gov

Executive Summary

Following the murder of a correctional officer in 2011, the Department of Corrections implemented a series of initiatives designed to improve staff safety. The National Institute of Corrections and the Washington Department of Labor and Industries each issued reports on the officer's death, which became the basis for a bill requested by Governor Gregoire and passed by the Legislature. In response, the Department developed a series of staff safety initiatives that included those required in the bill. We designed this audit to determine whether the Department's staff safety initiatives have improved the safety of prison staff.

To conduct this audit, we hired experts in the field of corrections from the Criminal Justice Institute. We learned that while the Department collects some performance information relevant to staff safety, it does not have clearly defined performance goals, objectives and measures for the staff safety initiatives, making it difficult to evaluate their effectiveness. Instead, we evaluated how well the Department had designed and implemented the initiatives by reviewing relevant policies and procedures, visiting each of the state's 12 prisons to observe practices, and conducting focus groups and interviews with prison staff to gain their perspectives. We also surveyed all staff to get their opinions on the effectiveness of the initiatives and to ask how they felt about their safety, and that of their co-workers and work environment. We asked questions about staff's perceptions of safety because it is our experts' opinion that feeling safe is a good indicator of staff safety. To identify if there are other things the Department could do to further improve staff safety, our experts compared the Department's staff safety related policies, procedures and practices to correctional leading practices.

Washington's staff safety initiatives are innovative and unique

According to our experts, no other state has developed such an advanced and comprehensive group of initiatives focused on improving staff safety. They believe the safety initiatives, listed below, are all based on good correctional practices, have likely improved the safety and security of prison staff, and – if fully and consistently implemented – will continue to reduce the risk of harm to staff.

Staff safety initiatives devised and implemented by Washington's Department of Corrections

Initiative category	Initiative description
Staff accountability	Developed policies, procedures and practices designed to ensure facilities can account for all staff in an emergency
Safety equipment and facility improvements	Added equipment: • For personal protection, such as pepper spray • To signal the need for assistance, such as duress alarms and body alarms • To improve visibility, such as additional cameras and mirrors
Offender job placement and classification	Created multidisciplinary teams to decide offender job placement and classification
Staffing changes	Added staff at each facility, including a security specialist to coordinate and provide support for staff safety initiatives, including managing the staff suggestion process
Security training	Added specific security training to the annual training program for all staff, held security forums with all first-line supervisors to discuss safety and implemented monthly "place safety" musters for all staff
Statewide and local security advisory committees	• Created a statewide committee with representation across facilities and staff levels to advise the Department on safety issues and staff concerns • Created local committees at each facility to review staff safety suggestions and make recommendations to their facility or the statewide committee

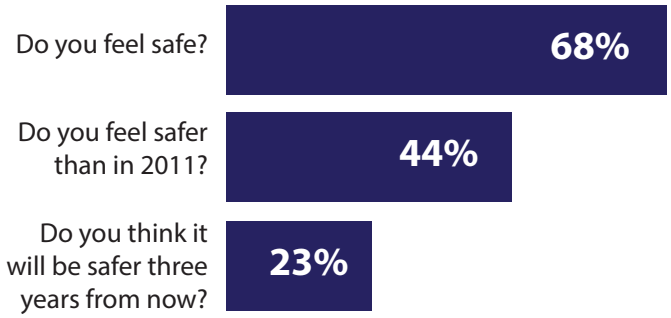
In addition to the initiatives listed above, the Department implemented a pilot program known as Operation Place Safety at the Washington State Penitentiary focused on reducing offender violence. When comparing the number of violent incidents committed by offenders before and after the program was introduced, the Department noted no change in the overall number of offender violent incidents, but a significant reduction in the number of offender aggravated assaults on staff. Because of this success, this program has now been expanded to an additional facility.

The majority of prison staff feel safe, but less than half feel safer now than before the safety initiatives began

Our experts believe the Department's initiatives are well designed and staff are likely safer now than before the initiatives were implemented. However, they also believe how staff feel about and perceive their safety influences how they approach their work, including how well they follow safety procedures. To determine how staff feel about their safety, we conducted a survey of all prison staff. We asked if they currently feel safe working in their facility, if they feel safer working there now than in 2011 and if they think they will feel safer three years from now. Twenty-one percent of staff responded to the survey, which is typical for an online survey conducted by an external source. To help us understand how well the respondents represented all staff, we compared them to staff demographics at the time the survey was conducted. We found that those demographic groups that had more positive responses were over-represented, indicating that the results may overstate how all staff feel about their safety. Survey results indicated that most respondents feel safe at their facility, but fewer than half said they feel safer now than they did in 2011. Fewer than a quarter believe they will be safer in the future. In focus groups, staff offered positive feedback about the safety initiatives, but attributed their sense of safety to their co-workers' support in addition to the initiatives, which our experts tell us is to be expected in a correctional setting.

The majority of staff feel safe now, but not safer than before

Percent responding "yes"



Source: Auditor prepared based on survey of prison staff.

Staff feedback on what is and is not working well is consistent across facilities

In our survey, we asked staff to write in what they think was the single most effective action taken to improve staff safety at their facility in the past three years. Responses were similar across all facilities. Some of the actions employees identified as most effective included improved accountability procedures, the deployment of pepper spray, and more radios or added radio features, such as remote microphones and duress alarms. However, the third most common response written in by staff was "nothing," indicating some staff may not believe any of the initiatives have improved safety.

We also asked staff to write in improvements they believe would make them feel safer. Three often cited actions were hiring more staff, installing more cameras and mirrors, and providing better responses to their safety concerns.

In addition to the concerns raised by survey respondents, people in our focus groups stressed the importance of feeling listened to. Some people said they wanted more dialogue with management, while others wanted more opportunities to communicate with each other.

Survey respondents as well as focus group participants said that they liked the newly implemented place safety musters and security advisory committees, but expressed concerns about the way meetings were run and that they do not always receive feedback or information on whether their safety suggestions were acted on.

Some staff also stated in the survey and in focus groups that shift musters – short, formal meetings held by supervisors and custody officers just before a shift change – were important because they kept officers aware of incidents, current challenges, potentially disruptive offenders and the general climate of the facility. Shift musters were eliminated before the safety initiatives began in response to a legal settlement that determined time staff spent at these musters was beyond their shift and eligible for overtime.

Opportunities to improve implementation of staff safety initiatives

We found that although each facility had implemented the initiatives to some degree, not all initiatives have been fully or consistently implemented. While staff feedback was mostly positive, our experts said the Department will need to continue to evaluate and improve the effectiveness of their staff safety initiatives by engaging with staff to be sure they understand what is expected of them.

Our experts evaluated the Department's policies and procedures specific to the staff safety initiatives and observed the initiatives in practice during their visits to each facility. They found that the following areas could be improved by clarifying guidance and expectations:

- Staff accountability procedures, such as sign-in/sign-out
- Requirements for non-custody staff to carry radios and emergency equipment
- Requirements for testing duress alarms
- Expectations for the security specialist position
- Process for acting on the suggestions made by local security advisory committees
- Format and direction of place safety musters
- Number and placement of cameras

Our experts also found that more could be done to improve staff engagement and communication through the place safety musters and to ensure that facility managers have time to regularly interact with facility staff.

Gaps exist between correctional leading practices and those used by the Department

To identify other opportunities for improving staff safety, our experts developed a list of correctional leading practices most relevant to reducing the risk of harm to staff based on corrections industry sources and their expert opinions. They then compared this list to the Department's and each facility's safety related policies, procedures and practices.

Overall, they found the Department has good policies and procedures encompassing most areas that are considered important correctional practices. However, our experts did find some areas that are not fully addressed by Department or facility policies and practices, or are not being adequately carried out.

Identified concern	Leading practice category
Staff search policy is absent, and practices are inconsistent	Searches and contraband control – staff
Cell searches are too infrequent and inconsistent across facilities	Searches and contraband control – facility
Staffing model has not been updated to account for the additional demands placed on staff	Staffing
Visibility is poor in some areas	Physical environment
Search policies for people entering facilities are lacking	Perimeter – access and egress
Control center access policy is inadequate	Control center/communications
Policies on whether non-custody staff need to carry radios are lacking, and practices are inconsistent	Offender programs and services
Policies surrounding offender movement need improvement	Offender movement
Monitoring and auditing activities could be more focused	Monitoring and auditing

The Department needs more specific performance goals and measures to improve the effectiveness of its staff safety initiatives

We identified several concerns with department and facility practices

Our analysis found that while the Department collects and analyzes performance information related to staff safety, it lacks specific performance goals and measures for its staff safety initiatives. To evaluate whether its initiatives have effectively improved staff safety, Department executives and managers told us they use the rate of offender violent infractions, especially those committed against staff. They look at these rates over time for each facility and all facilities combined. They also track the number of staff security suggestions that have been suggested and implemented, and review the results of their internal operational reviews for items specific to staff safety. The Department also measures the effect of two specific efforts they have undertaken to improve staff safety. One focuses on whether the staff's increased use of pepper spray has reduced staff injuries. The other focuses on whether the Operation Place Safety pilot project has reduced offender violence, especially the number of aggravated assaults on staff.

It should also be noted that the Department participates in the Association of State Correctional Administrators Performance-Based Measures System, which helps correctional agencies capture, record, report and share correctional data. When looking at data reported in the system by participating states, Washington has been below the average rates for measures associated with offender violence against staff since it began reporting this information in 2011.

While all the performance information described above provides the Department executives and managers important information on the level of offender violence and some of the changes they have implemented, it does not provide specific information on how well each of the staff safety initiatives are working. Specific goals for each initiative and measures to evaluate them would give Department executives and managers the indicators they need to better understand if the initiatives have been effective. Periodic anonymous surveys and focus groups would also help Department executives and managers gather information on staff's view of the initiatives' effectiveness, their satisfaction with the safety initiatives, and how safe they feel while at work.

Recommendations

Based on the results of our audit, we recommend the Department continue its efforts to improve staff safety by determining whether adopting the following recommendations would be beneficial, and implementing those that have the greatest potential to improve staff safety.

1. Address the issues with implementation of the staff safety initiatives our experts identified, including clarifying policies and procedures related to staff accountability, radios for non-custody staff, duress alarm testing, cameras, security specialists, place safety musters and the local security advisory committees.
2. Address the gaps identified by our experts between the Department's safety related policies, procedures and practices, and correctional leading practices. Specifically:
   a) Develop policies, procedures and practices to conduct staff searches.
   b) Evaluate and update the staffing model to ensure staffing levels are adequate and appropriately utilized to meet all the requirements placed on staff.
   c) Develop a more focused approach to monitor and audit the implementation of the staff safety initiatives to provide feedback on how well staff understand and are following relevant policies and procedures.
   d) Evaluate whether making further changes to department policies, procedures and practices to address additional identified gaps would be beneficial, including cell searches, issues with visibility, searching people entering facilities and access to facility control centers.
3. Enhance the Department's current approach to assessing the effectiveness of the staff safety initiatives and how well they have been implemented at the facilities to provide additional opportunities for continual improvement. To do so:
   a) Develop specific performance goals and measure progress toward meeting those goals.
   b) Conduct periodic, anonymous staff surveys and focus groups to gather staff input on the effectiveness of the staff safety initiatives and whether they have improved how safe staff feel.
4. Improve staff communication about safety issues. To do so:
   a) Provide additional guidance and training to facilitators to improve the effectiveness of the place safety musters, and local and statewide safety advisory committees.
   b) Evaluate whether the benefit of re-establishing shift musters, which allow staff the opportunity to communicate about potential safety concerns before beginning their shift, outweighs the additional staff time and expense it would incur.
   c) Provide more specific guidance for the role of the security specialist to ensure good communication occurs on staff safety issues at the facilities, including ensuring staff receive feedback on the status of their staff safety suggestions.

Introduction

Prisons are, by their nature, dangerous places to work. Managing a population whose crimes compelled their removal from society inherently entails risks to staff. Sound policies and practices and new technology can help keep staff safer if they are put in place and used as intended.

Following the murder of Correctional Officer Jayme Biendl in January 2011 at Monroe Correctional Complex, the National Institute of Corrections and the Washington Department of Labor and Industries each conducted investigations and issued reports on the officer's death, which became the basis for a bill requested by Governor Gregoire (Engrossed Senate Bill 5907) and passed by the Legislature. The Department developed a series of staff safety initiatives that included those required in the bill.

We wanted to know whether the changes the Department put into place have improved staff safety. Specifically, the audit was designed to answer the following question:

- Have the Department's staff safety initiatives improved the safety of prison staff?

To answer this question, we evaluated how well the staff safety initiatives were designed and implemented, including gathering staff perspectives. We also evaluated whether the Department's staff safety related policies, procedures and practices could be improved by comparing them to correctional leading practices, and whether the Department is collecting and analyzing performance information that will help its executives and managers continue to improve staff safety.

Technical subject matter experts

To perform this audit, we hired the Criminal Justice Institute to provide subject matter expertise. The Criminal Justice Institute is a private, not-for-profit firm with more than 30 years of experience serving federal, state, county and municipal criminal justice agencies. It was established in 1978, with the goal of making significant contributions to criminal justice systems by providing consultation, research and information dissemination services, with a primary focus on prison and jail systems.

The Criminal Justice Institute maintains a core staff of 12 employees and a pool of more than 100 consultants with specialized skills. Other services provided by the Criminal Justice Institute include training, program development services, efficiency studies, surveying, staffing analyses, correctional master planning, and program evaluations and policy analyses for government agencies, not-for-profit and private sector organizations in the United States and abroad.

Biographical details on the experts that contributed to this audit can be found in **Appendix C** of this report.

Background

The Washington State Department of Corrections operates the state's correctional facilities and its community corrections program, which manages offenders once they are released as well as those who serve their sentence under supervision within their communities. This audit focuses on staff safety at the state's 12 prison facilities.

As illustrated in **Exhibit 1**, four are stand-alone minimum custody level facilities, while the others have offender populations with a mixture of custody levels: maximum, close, medium and minimum. Ten of the prisons house male offenders, and two house female offenders. The facilities vary dramatically in age, from the Washington State Penitentiary, which opened in 1886, to the newest facility, Mission Creek, which was opened in 2005. The age and physical structure of each facility, as well as the mix of offender populations and sizes, means the state must customize its efforts at each facility to best promote staff safety.

Custody level definitions

Minimum – Least supervision, offenders can become eligible for community work programs

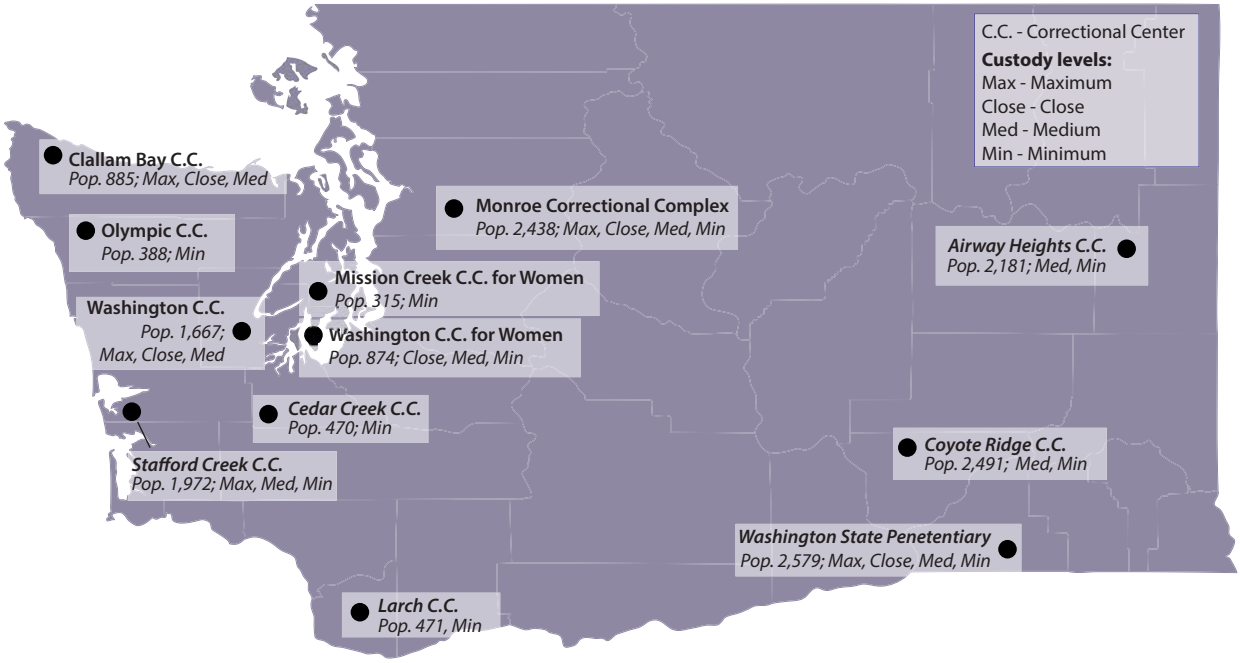
Medium – More supervision, less freedom of movement and fewer program opportunities

Close – More supervision, limits on property, movement and programs

Maximum – Highest level of supervision, movement highly restricted

Exhibit 1 – Washington state prison facilities

Offender populations at Washington's prisons as of December 2014



Source: Auditor prepared based on information from the Department of Corrections.

To be sent to a state prison, rather than to a local jail, an offender must be sentenced to more than a year and a day in confinement. The Department assesses incoming offenders to determine the appropriate custody level, taking the offender's history and behavior into consideration. Offenders are then placed in the prison most appropriate to their custody level and program needs. Through good behavior, it is possible for offenders to transition to a lower custody level.

The Department told us changes in sentencing laws have led to a per capita offender population that is smaller than most other states, but is on average older, more violent and more likely to be challenged by mental illness. The changes have also led to an increasingly gang-affiliated share of offenders who tend to commit a higher rate of violent infractions while in prison. These issues make managing the offender population in a way that ensures staff safety even more complex.

Since the murder of Officer Biendl, the Department has taken significant steps based on the requirements established in ESB 5907 to improve the safety of prison staff. The stated legislative intent focused on promoting safe prisons, but acknowledged that operating safe prisons requires a commitment to continuously improving staff safety. More specifically, the bill required the Department to:

- Establish statewide and local security advisory committees to recommend policy changes to improve staff safety
- Establish multidisciplinary teams to review offender assignments
- Develop a staff safety training curriculum
- Study and plan for the implementation of body alarms, proximity cards, improved camera coverage and pepper spray
- Annually report to the governor and the Legislature on progress made to meet these requirements

In addition to addressing these requirements, the Department has changed its staff safety program as a result of staff suggestions made in the newly established safety advisory committees.

Scope and Methodology

Our audit was designed to determine whether the Department's safety initiatives have improved state prison staff's safety and to identify areas where the Department could further improve staff safety. To answer this question, we hired subject matter experts from the field of corrections; information on the background and experience of our subject matter experts can be found in Appendix C.

We asked our experts to evaluate how well the staff safety initiatives were designed and implemented, and to evaluate the Department's staff safety policies, procedures and practices to identify any significant gaps against correctional leading practices. We also asked them to evaluate whether the Department collects and analyzes appropriate performance management information to help executives and managers understand whether the staff safety initiatives are improving staff safety and to help improve the initiatives.

To identify the staff safety initiatives the Department developed and implemented, we reviewed policies and procedures, reports and other documentation the Department provided. We also interviewed executives, managers and staff responsible for the initiatives' design and implementation.

To identify correctional leading practices most relevant to staff safety, our experts applied their professional judgment to the well regarded correctional practices put forth by the American Correctional Association and the U.S. Department of Justice Federal Bureau of Prisons' National Institute of Corrections. Based on these practices and their professional experience, our experts developed a list of correctional leading practices they believe are most relevant to ensuring staff safety. A complete set of these practices identified by our experts can be found in **Appendix D**.

We continued our research with field visits and surveys

Between December 2014 and April 2015, our experts visited all 12 Washington state prisons. During those site visits, they reviewed documentation, conducted focus groups with staff, interviewed staff, and directly observed practices related to overall staff safety and security, and specifically to the staff safety initiatives.

To identify what management information the Department uses to evaluate its staff safety initiatives, we interviewed Department executives, managers and staff to understand what data they collect, how it is analyzed and how it is used.

To determine whether the initiatives have made staff feel safer and gain staff perspectives on the effectiveness of the initiatives, we conducted an anonymous survey of all 5,303 staff employed at the prisons in October 2014. (**Appendix E** contains an example of the survey.) Twenty-one percent (1,112) of all staff responded to the survey. While this response rate was lower than we hoped for, it is not unusual for online anonymous surveys from an external source, which typically have response rates around 25 percent. To see how closely the respondents corresponded to the total population of prison staff, we compared their characteristics to those of all prison staff at the time the survey was conducted to determine if any particular groups were over-represented.

We also asked staff for their views on safety during multiple focus groups we conducted at each of the 12 facilities during our visits. Separate focus groups were held for custody staff, non-custody staff and supervisors to see if there were

differences in their perceptions. Results from both the survey and the focus groups were consistent on which initiatives staff thought were and were not effective, and how they felt about their own safety and that of their co-workers and work environment. The consistency between these results, and their consistency with our experts' observations during their facility site visits, provides further validation of the results of our staff survey. Survey results are included in each of the prison facilities profiles in **Appendix F**.

To determine whether the Department could improve staff safety in other areas, our experts compared the Department's staff safety related policies, procedures, and practices to correctional leading practices and identified several areas where further improvements could be made.

The Department relies on several different sources of performance information to monitor staff safety and understand how well its staff safety initiatives are working. One of the primary measures they use to understand whether the initiatives are improving staff safety is to look at changes in offender violent infraction rates overall and at each facility, including a subgroup of violent infractions focused on offender assaults against staff. We analyzed this data by comparing changes in the infraction rates to the timing of the implementation of the staff safety initiatives. We also talked to Department executives and managers about how they use this data to assess the initiatives' results, and other data they look at to understand if their staff safety initiatives and programs are working.

Auditing standards require we determine the sufficiency, appropriateness and reliability of the data we use to develop our findings and conclusions. Limitations in the relevancy and reliability of available quantitative data to answer our audit objectives required us to rely on qualitative data, direct observation of practices, and our experts' evaluation of the Department's policies, procedures, and practices associated with staff safety, including the staff safety initiatives, against correctional leading practices and their combined professional expertise to conduct this performance audit.

Audit performed to standards

We conducted this performance audit under the authority of state law (RCW 43.09.470), approved as Initiative 900 by Washington voters in 2005, and in accordance with Generally Accepted Government Auditing Standards (December 2011 revision) issued by the U.S Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. **Appendix A** explains which I-900 areas are covered in the audit. **Appendix B** provides a more detailed description of our audit scope and methodology.

Next steps

Our performance audits of state programs and services are reviewed by the Joint Legislative Audit and Review Committee (JLARC) and/or by other legislative committees whose members wish to consider findings and recommendations on specific topics. Representatives of the State Auditor's Office will review this audit with JLARC's Initiative 900 Subcommittee in Olympia. The public will have the opportunity to comment at this hearing. Please check the JLARC website for the exact date, time, and location (**www.leg.wa.gov/JLARC**). The State Auditor's Office conducts periodic follow-up evaluations to assess the status of recommendations and may conduct follow-up audits at its discretion.

Audit Results

To help us conduct this audit, we hired experts in the field of corrections from the Criminal Justice Institute. We learned that while the Department collects some performance information relevant to staff safety, it does not have clearly defined performance goals, objectives and measures for the staff safety initiatives, making it difficult to evaluate their effectiveness. Instead, we evaluated how well the Department had designed and implemented the initiatives by reviewing relevant policies and procedures, visiting each of the state's 12 prisons to observe practices, and conducting focus groups and interviews with prison staff to gain their perspectives. We also surveyed all staff to get their opinions on the effectiveness of the initiatives and to ask how they felt about their safety, that of their co-workers, and of their work environment. We asked questions about staff's perceptions of safety because it is our experts' opinion that feeling safe is a good indicator of staff safety. To identify if the Department could take other steps to further improve staff safety, our experts compared the Department's staff safety related policies, procedures and practices to correctional leading practices.

Based on this work, our experts believe complete and consistent implementation of the staff safety initiatives will continue to increase the safety and security of prison facility staff. However, not all the initiatives have been fully or consistently implemented at all facilities, and there are gaps between the Department's policies, procedures, and practices and correctional leading practices. In addition, we found that while the majority of staff feel safe, less than half feel safer now than when the initiatives were implemented, and less than a quarter think they will feel safer three years from now. We found that while the Department collects and analyzes performance information related to staff safety, it lacks specific performance goals and measures for its staff safety initiatives. Specific goals on what each initiative is supposed to accomplish and measures to evaluate them would provide Department executives and managers with the indicators they need to better understand if the initiatives have been effective.

The Department's staff safety initiatives are innovative and unique

In response to the requirements in ESB 5907, the Department developed a series of staff safety initiatives designed to make the working environment safer for all correctional officers, non-custody staff and administrative staff working in the state's prison facilities. As part of this process, the Department developed new policies and procedures regarding staff safety. The initiatives address staff accountability, safety equipment, offender job and classification decisions, staffing and training.

According to our experts, Washington's approach to staff safety is innovative and unique among correctional agencies. They were not aware of any other state developing such an advanced and comprehensive group of initiatives focused on improving staff safety. They believe the Department's staff safety initiatives are all based on good correctional practices, have likely improved the safety and security of prison staff, and – if fully and consistently implemented – will continue to reduce the risk of harm to staff.

The major staff safety initiatives implemented by the Department are summarized in **Exhibit 2** and discussed in more detail below.

Exhibit 2 – The Department developed staff safety initiatives in six important areas

Initiative category	Initiative description
1. **Staff accountability**	Developed policies, procedures and practices designed to ensure facilities can account for all staff in an emergency
2. **Safety equipment and facility improvements**	Added equipment: • For personal protection, such as pepper spray • To signal the need for assistance, such as duress alarms and body alarms • To improve visibility, such as additional cameras and mirrors
3. **Offender job placement and classification**	Created multidisciplinary teams to decide offender job placement and classification
4. **Staffing changes**	Added staffing at each facility, including a security specialist to coordinate and provide support for staff safety initiatives, including managing the staff suggestion process
5. **Security training**	Added specific security training to the annual training program for all staff, held security forums with all first-line supervisors to discuss safety and implemented monthly "place safety" musters for all staff
6. **Statewide and local security advisory committees**	• Created a statewide committee with representation across facilities and staff levels to advise the Department on safety issues and staff concerns • Created local committees at each facility to review staff safety suggestions and make recommendations to their facility or to the statewide committee

1. Staff accountability

The purpose of improving staff accountability policies, procedures and practices is to make it easier to account for people's whereabouts during an emergency. To do this, the Department has developed processes to:

- Account for all staff, volunteers and visitors in all situations, including a sign-in/sign-out system at each prison for anyone moving from one area to another within the facility, as well as entering or leaving the facility perimeter
- Regularly check on staff stationed in isolated and one-person posts in person, by radio or by phone
- Establish appropriate ratios of staff to offenders in isolated work areas, with special attention to single-person posts
- Use response and movement officers to conduct random, unannounced checks of locations within their areas of responsibility
- Ensure two staff members are present when opening and closing program or work areas

The Department studied the feasibility of using proximity cards during a pilot test at the Washington State Penitentiary in 2012. Proximity cards provide an accurate on-demand accounting of all staff within a facility's perimeter. Card readers were installed throughout the facility at control points, and scanning the proximity cards was required to enter and exit the prison. Staff reported that the system worked well, and our experts determined the use of proximity cards to be the most effective approach to account for staff. Due to budget constraints, the Department has been unable to expand its use in other facilities but has requested additional funds from the Legislature to do so.

2. Safety equipment and facility improvements

The Department has provided or upgraded equipment that can help staff protect themselves or signal for assistance. Other improvements to facilities were custom designed to improve visibility.

- ***Pepper spray*** – Providing staff with pepper spray is intended to reduce or eliminate the need for hands-on intervention by officers in use-of-force incidents. A pilot project to test its effectiveness was launched in 2011. By October 2013, it had been approved for use by custody staff in all facilities. Initially, its use was approved for sergeants, specialty teams and some other staff. It is now mandatory for all custody staff in all facilities to carry it.
- ***Radios and duress alarms*** – After an evaluation of existing radio equipment, the Department replaced older radios at all prisons with models that included duress alarm buttons. These are emergency call buttons located on the microphone, which are attached to the lapel of an officer's uniform, in addition to the emergency button on the radio itself, worn on the belt. All custody staff are required to use these new radios. Staff must prioritize responses to any duress alarms and respond to any unidentifiable radio sound.
- ***Body alarms*** – Body alarms are worn by staff members and can be activated in a number of ways, both active and passive, to alert the control center that a staff member is in immediate danger. A successful pilot project was conducted in 2014 at Monroe Correctional Complex, and the Department plans to expand their use to all facilities.
- ***Cameras and mirrors*** – The proper placement of cameras and mirrors eliminates blind spots, giving staff a clearer view of their surroundings. The Department completed a study in 2012 that estimated it would cost $50 million to upgrade all video camera systems at all 12 facilities. The Department has made some progress upgrading and installing cameras, and received $24 million in its 2015-17 biennium budget for additional cameras.

3. Offender job placement and classification

To help ensure offenders are given jobs or assignments that do not create a staff safety risk, multidisciplinary teams now review offender classification decisions and job assignments. In addition to reviewing job assignments, these teams screen all offenders prior to transfer and custody level change. The Department also limits how long offender workers may remain in a job to prevent them from becoming too entrenched in any particular position.

4. Staffing changes

To coordinate and facilitate the various staff safety initiatives at the prisons, the Department created the position of facility security specialist. These employees are responsible for developing and maintaining a system to account for all staff, particularly during emergencies. They also play a lead role in running the local security advisory committee, drafting or revising security related policy language, updating staff post orders, managing communications between the local and statewide security advisory committees, and managing the facility's safety suggestion process. The security specialist works closely with the facility's chief of security, and ensures the regular monitoring and testing of duress alarms. In addition to the security specialists, in 2013 the Department added a graveyard-shift officer at the stand-alone minimum security facilities, and a day-shift officer to medium security units. Department executives also told us K-9 officers will be added to two additional facilities in March 2016.

5. Security training

The Department added safety related content to both initial and annual training for all staff. The new training emphasizes the development of a safety mindset, and encourages employees to identify strategies and practices that contribute to security and individual safety awareness.

As it developed the staff safety initiatives, the Department held a series of security awareness leadership forums at each of the facilities to get input from staff on security concerns and ways to make conditions safer. These forums transitioned into monthly place safety musters to give staff an opportunity to discuss safety issues. The place safety musters are also designed to supplement the Department's training program, with attendance counting towards required training hours. During the place safety musters, staff and their supervisors discuss safety issues, identify concerns, and work together to find ways to maintain a secure environment. These meetings are intended to provide structure and time to:

- Develop staff awareness of personal safety and that of others in their area
- Discuss current practices and assess vulnerabilities
- Increase staff knowledge of facility procedures by discussing operational updates and changes
- Conduct drills and training exercises
- Encourage teamwork and open communication

As reported in its 2015 annual report to the Legislature, the Department has also developed specific staff safety training curriculum adapted from *Keeping Prisons Safe: Transforming the Corrections Workplace* (C. Young, D. Pacholke, D. Schrum and P. Young; 2014) and its companion publication, *Keeping Prisons Safe: Field Guide* (C. Young, D. Pacholke, D. Schrum and P. Young; 2014). These publications were written by Department managers integral to the development of the staff safety initiatives and other changes the Department made to improve staff safety. The focus of these publications and the Department's annual staff safety training is to "target strategies for improving personal safety, the safety of others, and the safety and security of the workplace."

Place Safety Musters are meetings designed to encourage staff to think and talk about safety for themselves, for others, and for their workplace

Source: Department staff safety and security training materials.

6. Statewide and local security advisory committees

Department management recognized that dialogue is essential if staff are to remain engaged with the process of improving safety. It established the statewide security advisory committee – whose membership represents an equal combination of multidisciplinary bargaining unit members from each facility, and management representatives from each facility and Department headquarters – to keep lines of communication open. The committee reviews security concerns and suggestions from each facility's local security advisory committee and forwards recommendations to Department executives.

Each prison has its own local security advisory committee, similarly composed and with similar responsibilities. Those concerns that the local committee cannot resolve are referred to the statewide committee. All suggestions are tracked using a system that allows the Department and staff to follow progress made on resolving problems and implementing staff suggestions. Between 2011 and October 2015, staff submitted 2,862 security concerns and suggestions, of which 2,321 were completed at the local level. Of the remaining suggestions, 116 were referred to the statewide security advisory committee, and 77 of those have been completed.

Operation Place Safety pilot project focused on reducing offender violence

In addition to the initiatives listed above, the Department conducted a pilot project known as Operation Place Safety at the Washington State Penitentiary's West Complex. The pilot project focused on reducing offender violence, particularly aggravated assaults against staff. The Penitentiary was selected for this pilot project because the majority of aggravated assaults on staff in 2012 occurred there. The Department's summary report, Operation Place Safety: First Year in Review (June 1, 2014), describes Operation Place Safety as a deterrence-based strategy focused on reducing those violent acts committed by offenders who present the greatest risks to staff and offender safety. The strategy consists of three components:

- ***Enforcement*** – Prohibited violent acts – including staff assault, a fight/assault with a weapon, and multi-offender fights or assaults – are deterred by applying privilege restrictions to offenders who commit these acts and offenders they closely associate with.
- ***Help*** – Offenders receive assistance, including programs and jobs, to help them succeed in pro-social alternatives to violence.
- ***Engagement and notification*** – Offenders receive direct communication to notify them of the prohibited violent acts and the response to these acts, to encourage participation in programs and meaningful activities, and to reinforce pro-social values.

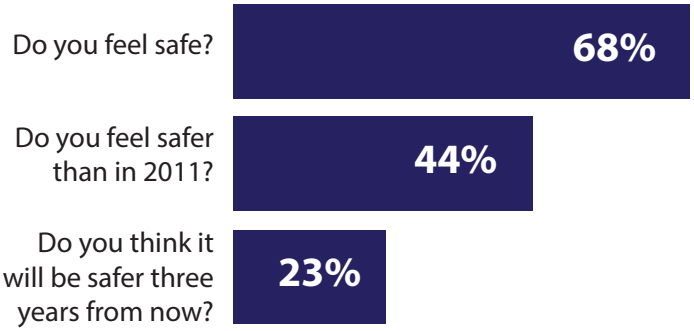
To evaluate whether this approach has reduced offender violence, the Department compared the number of violent incidents in the year before and year after the program was introduced. The Department's report noted that the overall number of violent incidents has not changed, but those categorized as prohibited violent acts were reduced by almost 50 percent, including a significant drop in aggravated assaults on staff from six in 2012 to one in 2013. Because of this, Operation Place Safety has been expanded to an additional facility.

The Department's use of data to understand whether Operation Place Safety tactics are reducing offender violence is a good example of how the Department can use specific performance information to understand the effectiveness of its staff safety initiatives. However, the Department recognizes that more evaluation, including developing more robust outcome indicators, will be needed as the program moves forward "to determine if the reduction in serious acts of violence is a direct product of Operation Place Safety."

The majority of prison staff feel safe, but less than half feel safer now than before the safety initiatives began

Our experts believe the Department's staff safety initiatives are well designed and staff are likely safer now than before the initiatives were implemented. However, they also believe how staff feel about their safety influences how they approach their work, including how well they follow safety procedures. In our survey (see **Appendix E**) of all 5,303 staff employed at the prisons in October 2014, we asked if they currently feel safe working in their facility, if they feel safer working there now than in 2011, and if they think they will feel safer three years from now. Twenty-one percent (1,112) of staff responded to our survey and as shown in **Exhibit 3**, we learned that the majority of respondents feel safe at their facility, but less than half feel safer now than they did three years ago. We also found that less than a quarter of the respondents think they will be safer in the future.

Exhibit 3 – The majority of staff feel safe now, but not safer than before
Percent responding "yes"



Source: Auditor prepared based on survey of prison staff.

While 21 percent is a lower response rate than we had hoped for, it is typical for an online survey conducted by an external entity. Given the low response rate, we compared the demographics of the respondents to those of the total population to help us understand how well the respondents represented all staff. We found that women, non-custody staff, older staff and staff who had worked at the Department for a long period of time were over-represented. We also found that these over-represented groups of respondents feel safer, on average, than their counterparts, meaning if the survey respondents had been more representative of the actual staff population, the responses would likely have been less positive. Despite these limitations, we found the survey results to be consistent with our focus group results and our experts' observations during their site visits, providing further validation that the results are representative of overall staff perceptions of the staff safety initiatives when the survey was conducted.

In focus groups, staff also offered positive feedback on the staff safety initiatives, but they attributed their safety more to their co-workers than to the initiatives. This is not surprising in a correctional setting, according to our experts, and may also be attributed to the Department's efforts to train its staff on their responsibility for their own safety, and that of their co-workers and work environment.

Staff feedback on what is and is not working well is consistent across facilities

To learn more about which initiatives were working well and which were not, we asked staff in the survey to write in what they thought had been the most effective action taken to improve staff safety and what needed improvement. We also asked these questions during our focus groups conducted at each facility. We found that staff from across all facilities gave similar answers.

The actions they identified as most effective included:

- ***Improved accountability procedures.*** Staff at all 12 prisons acknowledged improved accountability procedures, such as documenting the arrival, departure and location of employees and regular checks on isolated posts as effective actions that improve staff safety.
- ***The deployment of pepper spray.*** Staff at 11 of the 12 prisons identified the deployment of pepper spray as one of the most effective changes. They stated it reduced the risk of injury because they do not need to make physical contact with offenders as often when intervening in fights and other situations. Overall, it was the second most common action identified by survey respondents.
- ***Radios.*** Many people mentioned having more radios available to staff and the added radio features, such as remote microphones and duress alarms.

However, the third most common response was "nothing," indicating that some staff may not believe any of the initiatives have improved safety. It was among the top three responses at six facilities, the most common response at the Monroe Correctional Complex, and the second most common response of correctional officers. The majority of staff at those six facilities also said they did not feel any safer than in 2011.

Our survey also asked staff to write in improvements that would make them feel safer. Three often cited actions were:

- ***Hiring more staff.*** Additional staff was the first-choice answer by an overwhelming margin overall and was the top answer at all 12 facilities. Staff mentioned that they could not fulfill existing duties, let alone the added duties resulting from the new safety initiatives. Others mentioned they were required to perform tasks that were not relevant to their positions.
- ***Installing more cameras and mirrors.*** Staff from eight of the 12 facilities identified blind spots as a major concern, and said more cameras and mirrors were needed to improve visibility. Staff at one facility said the few cameras they had were not operational, and if they had been, there was no equipment to monitor the resulting video.
- ***Responding to safety concerns.*** Respondents also said they wanted management to listen to them and better respond to their safety concerns. They consistently said they wanted timely feedback on the suggestions they made during safety musters and to their local security advisory committees.

Questions asked during staff focus groups

1. Are you aware of changes that have been made to improve staff safety at this facility? Can you describe them?
2. How do you know whether or not the changes have made the facility safer? How would you measure a positive change?
3. Have any of those changes made a positive difference in safety? If yes, in what regard? If not, why not and what might be changed to improve their effects?
4. In your opinion, what additional measures should be taken to improve staff safety at this facility?
5. Do you feel safe during your workdays at this facility? If not, why not?

Staff feedback points to need to improve communication

In addition to the communication concerns raised by survey respondents, staff in our focus groups stressed the importance of feeling their voices are heard. Some said they wanted more dialogue with management, while others wanted more opportunities to communicate with each other.

Staff feel that meetings dedicated to safety issues could be more effective. Survey respondents and focus group participants said they liked the safety musters and security advisory committees, but they rarely received feedback or learned if the Department or their facility took action on their safety suggestions. They also agreed that more consistent facilitation of meetings was important. In focus groups, staff members from every facility stated they liked the stated purpose of the safety musters, but they also said staff enthusiasm for the musters has been waning. Some survey respondents said the musters are no longer productive; discussion topics may be too prescriptive or do not relate directly to their work. Survey respondents at only five of the 12 facilities agreed that their local security advisory committee was effective at improving staff safety.

Staff had mixed feelings about the effectiveness of the security specialists, who are responsible for facilitating communication between the local and statewide security advisory committees. Many people said in the survey and the focus groups that they liked having the dedicated security specialist position. However, some felt that the officers were diverted into unrelated non-security activities, while others felt their security specialist was ineffective.

Effective advisory committees and positive perceptions of improvements to staff safety may be connected. Our survey revealed that favorable views of the local security advisory committee and Department management aligned with positive perceptions about improvements to staff safety. As **Exhibit 4** on the following page shows, the majority of respondents from five facilities said they felt safer now than in 2011. These were the same five facilities where the majority of respondents felt the committee was effective, and that Department management was concerned about staff safety. Respondents at the remaining seven facilities gave less positive feedback on the committee's effectiveness and the Department's concern for their safety, and said they did not feel safer than they did in 2011.

Exhibit 4 – Survey results indicate effective committees correlate to positive staff safety perceptions

Facility	Percentage of staff who feel the Security Advisory Committee has been effective	Percentage of staff who feel they are safer than in 2011	Percentage of staff who feel the Department is concerned about their safety
Olympic Corrections Center	**68%**	**69%**	**65%**
Washington Corrections Center for Women	**64%**	**61%**	**60%**
Mission Creek Corrections Center for Women	**62%**	**78%**	**70%**
Clallam Bay Corrections Center	**60%**	**61%**	**60%**
Coyote Ridge Corrections Center	**54%**	**55%**	**67%**
Stafford Creek Corrections Center	49%	38%	51%
Washington Corrections Center	47%	46%	47%
Airway Heights Corrections Center	45%	40%	49%
Washington State Penitentiary	40%	36%	36%
Cedar Creek Corrections Center	40%	46%	34%
Larch Corrections Center	30%	43%	42%
Monroe Correctional Complex	29%	36%	36%

At the five prisons where the majority of staff feel the security advisory committee is effective, most staff feel safer and that the Department is concerned about their safety.

Source: Auditor prepared based on survey of prison staff.

A summary of survey and focus group results for each of the 12 prisons can be found in Appendix F.

Other venues for sharing information can also improve safety

Staff said information sharing between shifts was important and should be re-established. Sharing information between outgoing and incoming shifts is seen as essential in many settings, including hospitals and law enforcement agencies. Shift musters – short, formal meetings held between shift supervisors and custody officers at each shift change – are important because they keep officers aware of incidents, current challenges, potentially disruptive offenders and the general climate of the facility. They were eliminated prior to 2011 in response to a legal settlement that determined time staff spent at these musters was beyond their shift and eligible for overtime. Survey respondents and focus group participants both stated they would like to see shift musters re-established. The Department has implemented a 10-minute overlap on their shifts, and require staff to review logs and post orders once they are on post, but the majority of employees in the focus groups indicated that what they missed was the assembling of the entire shift so leadership could brief them on what happened on the last shift, and what specific actions should be taken on the upcoming shift.

Opportunities to improve implementation of staff safety initiatives

Our experts found that while all the staff safety initiatives have been put in place in some way at every facility, implementation across the facilities was inconsistent. They believe all the initiatives are good correctional practices and would improve staff safety if fully and consistently used, but it was difficult to evaluate their effectiveness because the Department has not developed specific goals, objectives and performance measures for them. While much of the staff feedback on the initiatives was positive, our experts said the Department will need to evaluate and improve the effectiveness of individual initiatives by engaging with staff to be sure they understand what is expected of them.

Based on their evaluation of the policies and procedures specific to the staff safety initiatives, and their observations of the initiatives in practice during their visits to each facility, our experts found many aspects could be improved by clarifying guidance and expectations. This includes:

- Staff accountability practices
- Use of radios and testing of duress alarms
- Processes to ensure appropriate numbers and placement of cameras
- Place safety musters
- Local security advisory committees

Based on their observations, they also found more could be done to improve staff engagement and communication through the place safety musters and ensuring that facility management have time to regularly interact with facility staff.

Staff accountability procedures need clarification

Although staff identified the new accountability procedures (such as sign-in/sign-out, two-to-open/two-to-close, and staff accountability drills) as among the most effective initiatives, our experts think they could be improved. In particular, the experts observed issues with sign-in/sign-out procedures in most of the facilities. Sign-in/sign-out practices varied between and also within facilities; parts of some facilities had none at all. Without an effective sign-in/sign-out process, it is difficult to know the location of staff during emergencies.

Our experts observed the problem firsthand during the staff accountability drills held while on their facility visits. On some drills, it took an hour to account for all staff. The Department's policy requires facilities to conduct staff accountability checks, but the policy does not include an expectation of how long it should take a facility to account for all staff. During drills, non-custody staff and custody staff without fixed posts were the most difficult to account for because their jobs require them to work at various locations within the facility.

Our experts also observed some confusion among staff on how to implement the two-to-open/two-to-close policy, which has led to different practices at different facilities. In some cases, in addition to having two staff present when opening or closing a program or work area, a facility will require that the buildings be searched and/or cleared by two people. Staff members told our experts that they believe the Department's two-to-open/two-to-close policy is creating workload issues because it pulls correctional officers away from their units, and takes response and movement staff away from their primary duties. Clarification on what staff are expected to do to comply with this policy would be beneficial.

In addition to specific performance goals and measures, other changes designed to improve accountability within the prisons' security perimeters could make these systems more effective. Procedures to better account for the whereabouts of non-custody staff and those who do not have fixed post assignments could also be beneficial. In addition, factoring workload effects of policy and procedural changes into a revised staffing model could help ensure that the implementation of these security practices does not adversely affect the availability of staff to respond to security incidents.

Requirements for non-custody staff to carry radios and emergency equipment need clarification

While Department policy requires custody staff to carry radios while on duty, it is unclear whether non-custody staff should be issued or be required to carry radios or other emergency communication equipment. A lack of clarity on Department expectations on this point has created confusion among staff and added to their concern for their own safety. Our experts noted many instances when non-custody staff were issued or have access to radios or body alarms, but, again, the practice was inconsistent between and within facilities. For example, non-custody staff working inside some units had access to radios, but others working in direct constant contact with offenders, such as in education or health care, had to share a radio with others in their work area. Our experts also observed that even if non-custody staff have access to radios, they do not always carry them. This was also true for other emergency equipment such as whistles. Staff feedback during our focus groups frequently mentioned the need to require non-custody staff to carry radios or body alarms. Our experts stated, at a minimum, the policy and procedure for carrying radios by non-custody staff, including whether they are required to carry them, should be consistent between facilities and custody levels.

Locating staff

Designing an inexpensive yet reliable system to account for the whereabouts of staff can be tricky.

Sign-in/sign-out sheets and whiteboards, for example, rely on manual processes that may fail in hectic situations or when employees forget.

Requirements for testing of duress alarms needs clarification

Employees widely reported that the use of new radios with microphones and duress alarms was an effective step in improving workplace safety. However, many told us that the policy requiring that someone check every time a person signals their duress alarm has added a burden to staff workload because of the high number of false alarms. Our experts also observed that regular tests of the duress alarm system were not conducted at any of the facilities. Facility management and security specialists told us they do not fully understand the policy requirements for regular testing and tracking; they thought that the responses to the many false alarms was an adequate way to test the system. While our experts agree with the need to check on staff whenever a duress alarm has been triggered, clarification on expectations for testing and responding to these alarms would help facility staff be better prepared for situations when a duress alarm is triggered in an emergency situation.

Cameras are insufficient or are not well placed

According to our experts, more than half the facilities had insufficient cameras for complete visibility, particularly in offender program areas. The experts observed that program areas (such as education, correctional industries, gym, chapel and health care) did not have ideal visibility because of facility design or lack of cameras. A more systematic, standardized approach to mapping the outlying areas where more camera coverage is needed could benefit the system as a whole. A lack of cameras was also one of the issues consistently raised by staff in focus groups. The Department completed a study in 2012 that estimated it would cost $50 million to upgrade all video camera systems at all 12 facilities.

The Department is already making progress in its plans to improve visibility by installing more cameras during the last and current biennia. The Department received $24 million in its 2015-17 biennial capital budget for adding more cameras to remedy this situation. However, the cost and budget constraints, as well as the time and effort required for procurement and installation, mean the upgrade of the camera system will be a multi-year process.

Security specialist position expectations need clarification

Our experts believe the facility security specialists are an important addition to the staff safety toolbox, and based on their observations, they found the specialists are doing a good job carrying out their responsibilities. In most cases, they saw that the specialists work closely with the facility security chiefs and management on security monitoring and operations. However, our experts observed some issues, including specialists not routinely testing duress alarms and performing duties that were outside their primary role. For example, employees told them security specialists are sometimes involved in investigations of staff, which could undermine the integrity and purpose of the position, while others said the specialists' role was unclear, with little or no authority. In addition, our experts observed that the Department's expectations for the specialists regarding the frequency or content of communication with staff about the results of their security suggestions could be clearer.

Our experts also believe the prison system as a whole would benefit if security specialists shared internal "best practices," and developed a more consistent approach to communicating the status and outcomes of facility security suggestions.

Place safety musters could be better utilized

Our experts all agreed that the monthly place safety musters were valuable, offering a venue to raise staff awareness on safety issues and for communication between staff and management. However, in alignment with staff feedback, our experts found opportunities to improve how the place safety musters are conducted. They found issues at more than half the facilities, where they noted that staff described the musters as lacking momentum and attendance. During their prison visits, our experts observed a wide range of facilitation styles and quality in the place safety musters, with differences in the purposes of the meetings. Some appear to be run with a "top-down" approach, with a fixed agenda and little or no staff input, while others allow for significant staff participation, as intended. Some focus group participants said the facilitators did not always keep the forum focused on staff safety.

Clarification on the expectations about the format of the meetings and ensuring the right balance of top-down direction and bottom-up participation could help keep these meetings dynamic and relevant, and maintain or improve staff involvement. Based on feedback from staff and their observations of place safety muster meetings at the facilities, our experts also noted that the musters might be more effective if they occasionally included staff or correctional officers who are from different units or have expertise in a particular subject.

Local security advisory committees

Similarly, the experts observed that while the local security advisory committee meetings were well-attended, and included a broad group of individuals from multiple disciplines as the policy intended, the approaches to managing the security suggestion process varied by facility. Both survey respondents and focus group participants implied that some committees were better at following up on the status of staff security suggestions than others.

Our experts attributed at least some of the implementation gaps across facilities to broad or unclear Department policies on how to carry out the staff safety initiatives. While the Department deliberately created some general policies to allow individual prisons the flexibility to best fit their specific needs, the lack of clarity has left staff unclear about expectations, and made it difficult for the Department executives and managers to understand what is working well in prisons and what is not.

Gaps exist between correctional leading practices and those used by the Department

To identify other opportunities for improving staff safety, our experts compared Department and facility safety related policies, procedures and practices – including those that support the staff safety initiatives – to a list of correctional leading practices they view as essential to ensuring staff safety. They developed this list of leading practices from corrections industry sources, including the American Corrections Association and the National Institute of Corrections, as well as their expert opinions. Appendix D includes a full list of the leading practices developed by our experts.

Sound written policies and procedures should be supported by post orders that provide specific instructions to correctional officers on the tasks they are expected to perform for their assigned post. If post orders are followed, practices should be in line with Department and facility policies. **Exhibit 5** describes each area of leading practices identified by our experts and its relationship to staff safety.

Post orders are detailed instructions that clearly specify job duties, responsibilities and expectations for correctional officer posts.

Exhibit 5 – Correctional leading practices relevant to staff safety

All practices should have clearly written policies, procedures and post orders

Leading practice	Description
Staff training	Staff training is critical to ensure staff understand how to manage safety systems and supervise offenders. They must be prepared to respond to various types of security threats and incidents, including defusing potential conflicts that could result in harm to staff and offenders.
Staffing	Staffing levels must be sufficient to safely and securely implement the policies and procedures of the prison facility. Each position should have clearly written post orders to ensure employees understand their assigned duties.
Physical environment	The physical environment of the facility should be designed to minimize risk to staff. There should be written policies to guide construction and inspection of facilities, and staff training on the appropriate use and inspection of the facility.
Housing	Offender housing must be designed and operated in a way that limits risks to staff. Staff should be trained how to manage and supervise offenders in their assigned housing units.
Perimeter – access and egress	Perimeter access and egress provide the last major line of defense for control and security against contraband introduction, assault, escape and intrusion. This is accomplished through appropriate policies and procedures, effective staff training, necessary equipment and facility structures.
Control center communications	The control center keeps order in prison facilities by providing timely response to both routine situations and operations, and unanticipated incidents. It manages security systems, keys, communications, offender and staff movement, emergency supplies, security equipment, and access and egress through the secure perimeter of the facility.
Offender counts	Formal and informal counting of offenders provides accountability for the entire offender population, preventing escapes, and ensuring a safe and secure working environment.
Hazardous materials	The proper control of flammable, toxic and caustic materials enhances staff safety by reducing the likelihood they are used as weapons against staff and offenders.
Searches and contraband control – facility	When contraband – which includes drugs, weapons, cell phones and escape tools – is introduced into a facility, it poses a threat to the facility's orderly operation and the safety of staff and offenders. Effective search and contraband control policies and procedures for buildings/areas, offenders, cells and visitors are necessary to minimize those threats.
Searches and contraband control – staff	To limit the introduction of contraband, it is also necessary to have effective contraband control policies and procedures, including searching staff.
Safety and emergency procedures	Adherence to safety and emergency policies and procedures reduces the opportunity for and likelihood of staff assaults, and makes it more likely emergencies will be successfully resolved. All staff must be aware of the plans, have sufficient equipment and be trained to execute the plans when needed.
Key control	Keys are essential to prison security and staff safety. Key control procedures provide the protection and security intended in the design of the locking systems.
Tool control	Tools for facility maintenance or use in approved offender work programs can become weapons or escape tools. Effective control and accountability procedures for tools and other sensitive items that are stored within, or brought into, the facility for daily use are necessary to minimize risks.

Leading practice	Description
Armory	Effective armory policies, procedures and practices ensure secure storage, handling and accountability of firearms, ammunition, chemical agents and security equipment; that only qualified employees are issued weapons and security equipment; and that offenders will not be able to gain access to them.
Offender rules and discipline	An orderly and disciplined facility is the basis of a safe and secure environment for both staff and offenders. Facilities must have rules of conduct, and sanctions and procedures for violations that are defined in writing and communicated to all offenders and staff. Disciplinary actions must be carried out promptly and with respect for due process.
Classification	A proper classification system ensures that offenders are classified to the most appropriate level of custody and program, both on admission and upon review of their status to ensure the safety and well-being of the community, staff and offender.
Offender programs and services	Policies and procedures should provide adequate supervision, security and contraband control for offenders who are participating in offender programs such as work, education, recreation, health services and religious activities. This includes limiting or restricting offender access to some programs and services to ensure the safety of staff, other offenders and the general public.
Offender movement	Policies and procedures governing offender movement are necessary to ensure accountability of all offenders, and the safety and security of staff, offenders and visitors. There is a high risk to staff and others if offender movement is not controlled in a methodical and consistent manner.
Security threat group management	The presence of violent prison security threat groups, or gangs, in a correctional facility poses a danger to both staff and offender safety. Because the activity level of gang members varies, it is important that information about them be gathered and analyzed continually. Effective programs include policies and procedures to identify and monitor potential threats and provide guidance on avoidance and de-escalation methods.
Monitoring and auditing	A complete monitoring and auditing program allows correctional agencies to determine the extent to which policy, procedure, standards and practice combine to provide a safe and secure facility. This is a critical management function that allows agencies to identify and correct problem areas, maintain established standards and promote continuous improvement.

Our experts compared these practices to current departmental policies, and facility procedures and practices, to identify potential shortcomings. Overall, they found that the Department has good policies that encompass most areas that are considered important correctional practices. In 11 of the 20 areas, the policies and practices at each of the facilities complied with the leading practices, and no major concerns were found. These areas include: staff training, housing, counts, hazardous materials, safety and emergency procedures, key control, tool control, armory, offender rules and discipline, classification and security threat group management.

However, our experts did find some practices that are not addressed by Department or facility policies, procedures and practices, or are not being adequately carried out. The concerns identified by our experts are summarized in **Exhibit 6** and explained in more detail below.

Exhibit 6 – Our experts identified several concerns with Department and facility practices

Identified concern	Leading practice category
1. Staff search policy is absent, and practices are inconsistent	Searches and contraband control – staff
2. Cell searches are too infrequent and inconsistent across facilities	Searches and contraband control – facility
3. Staffing model has not been updated to account for the additional demands placed on staff	Staffing
4. Visibility is poor in some areas	Physical environment
5. Search policies for people entering facilities are lacking	Perimeter – access and egress
6. Control center access policy is inadequate	Control center communications
7. Policies on whether non-custody staff need to carry radios are lacking, and practices are inconsistent	Offender programs and services
8. Policies surrounding offender movement need improvement	Offender movement
9. Monitoring and auditing activities could be more focused	Monitoring and auditing

1. ***Staff search policy is absent, and practices are inconsistent.*** Even though the Department states all employees are subject to being searched upon entering a facility, the Department policies do not mandate that staff be searched as they enter the facilities. They have a random search system, however, searches were not, in the opinion of our experts, conducted frequently enough. The lack of Department policies regarding staff searches has created inconsistencies across facilities, and none of the facilities have adequate internal policies requiring and describing staff searches. This raises the risk of contraband entering the facility, even inadvertently, which can lead to more violence among offenders, and fosters an institutional atmosphere that is more difficult to manage and keep safe. The majority of state correctional systems have policies and procedures regarding the routine searching of employees and their belongings. A recent survey completed by the Association of State Correctional Administrators found just seven of the 40 states that responded to the survey exempt staff from searches when entering a facility.
2. ***Cell searches are too infrequent and inconsistent across facilities.*** The Department has not established a policy for cell searches at each of the custody levels, resulting in inconsistencies between and within facilities. Our experts noted the frequency of cell searches in most housing units in higher custody level facilities is far below what they would expect.

3. ***Staffing model has not been updated to account for the additional demands placed on staff.*** The staffing model the Department uses is dated and inadequate for determining proper staffing needs. The existing staffing model relies on facilities to request additional staff when they need them, but these requests are not always granted. The model does not take into consideration the recent changes that have taken place as a result of the safety initiatives – which in some cases have added many more duties for existing staff – or changes to the offender population. During the facility visits, our experts noted several areas where additional staff may be required.
4. ***Visibility is poor in some areas.*** Almost every facility has one or more blind spots or areas of poor visibility where staff are unable to see and prevent offender rule-breaking or other harmful situations. The Department is in the process of installing additional cameras and mirrors to address this issue, but it does not have a systematic and standardized approach to determining where more cameras are needed or policies to prioritize where they should be installed, instead leaving it to each facility to develop its own approach.
5. ***Search policies for people entering facilities are lacking.*** In addition to an inadequate staff search policy, the Department does not have a policy that addresses searching and identifying everyone who enters its facilities. This could compromise staff safety through the introduction of contraband. Policies should require each facility to have procedures for processing and identifying all staff, contractors, volunteers and visitors.
6. ***Control center access policy is inadequate.*** Facility control centers play an important role in prison operations and must be kept secure. Staff who are not assigned there could distract or hamper the activities of assigned staff in the event of an emergency. Our experts noted current Department policies for managing facility control centers do not adequately state who is allowed to enter them and for what purpose.
7. ***Policies on whether non-custody staff need to carry radios are lacking and practices are inconsistent.*** The Department does not have a clear policy on whether non-custody staff who supervise offenders are required to carry personal safety equipment such as radios. A number of non-custody staff working in offender program areas told us they wanted more equipment and security related training such as self-defense.
8. ***Policies surrounding offender movement need improvement.*** There are many legitimate reasons for offenders to be out of their cells: meals, exercise or attending a program activity. While they are moving from one area to another, staff must follow set procedures to ensure everyone remains safe and rules are not broken. Our facility visits revealed an assortment of problems ranging from staff inattentiveness while offenders are out of their cells to offenders routinely using medical passes intended for emergencies. Better policies and procedures could also help ensure all offenders, including those who are given permission to be somewhere they were not originally expected, are accounted for during movement periods.

9. ***Monitoring and auditing activities could be more focused.*** The Department does not conduct a comprehensive annual safety and security audit of all areas of its facilities. Instead, it relies on several internal audit and review processes to evaluate and monitor how well facilities are following the Department's safety related policies and procedures. Currently, operational reviews are conducted annually at each facility by the internal audit team, focusing on how well facility staff follow selected Department policies and procedures; emergency management audits are conducted annually by emergency management staff, focusing on how well facility staff are prepared to respond to emergencies; and facility safety audits are conducted by the risk management unit, focusing on how well facilities are following state requirements for staff occupational health and safety.

   The Department has recently taken action to better coordinate these internal audits and reviews, and has developed a common log of corrective action items to track progress on resolving identified issues. To further improve the evaluation of the effectiveness of the staff safety initiatives, the Department could better focus these internal audits and reviews on relevant safety related policies and procedures to determine how well staff understand and are following them.

The Department needs more specific performance goals and measures to improve the effectiveness of its staff safety initiatives

Our analysis found that while the Department collects and analyzes performance information related to staff safety, it lacks specific performance goals and measures for its initiatives. Effective performance measurement involves deciding what to measure, figuring out how to collect needed data, collecting that data and then evaluating it to assess progress toward achieving performance expectations. Having specific goals and measures for the staff safety initiatives could help the Department determine whether they are achieving their intended results and identify opportunities for improvement.

To evaluate whether its initiatives have been effective in improving staff safety, Department executives and managers told us they use the rate of offender violent infractions, especially those committed by offenders against staff. They look at these rates over time for each facility and all facilities combined, and track the number of staff security suggestions that have been suggested and implemented. They also review the results of their internal operational reviews for items specific to staff safety. The Department also has two specific efforts in place to measure whether changes they have made related to staff safety have had a positive effect. One focuses on whether Operation Place Safety, as described earlier in this report, has reduced offender violence, especially the number of aggravated assaults on staff. The other focuses on whether the staff's increased use of pepper spray has reduced staff injuries. Preliminary results show that as correctional officers resolve more use-of-force incidents with pepper spray instead of physical force, the number of staff injuries during use-of-force incidents has declined.

It should also be noted that the Department participates in the Association of State Correctional Administrators Performance-Based Measures System, which helps correctional agencies capture, record, report and share correctional data. When looking at data reported in the system by participating states, Washington has been below the average rates for measures associated with offender violence against staff since it began reporting this data in 2011.

While the performance information described above provides Department executives and managers important information about what is going on in its facilities, it does not provide specific information on how well the remaining staff safety initiatives are working, or how safe staff feel working in their facility. The Department's reliance on statewide offender violent infraction rates, even when focusing on those related to offender assaults on staff, does not provide the specific or detailed information needed to understand whether the Department's staff safety initiatives have effected changes in offender violent infraction rates.

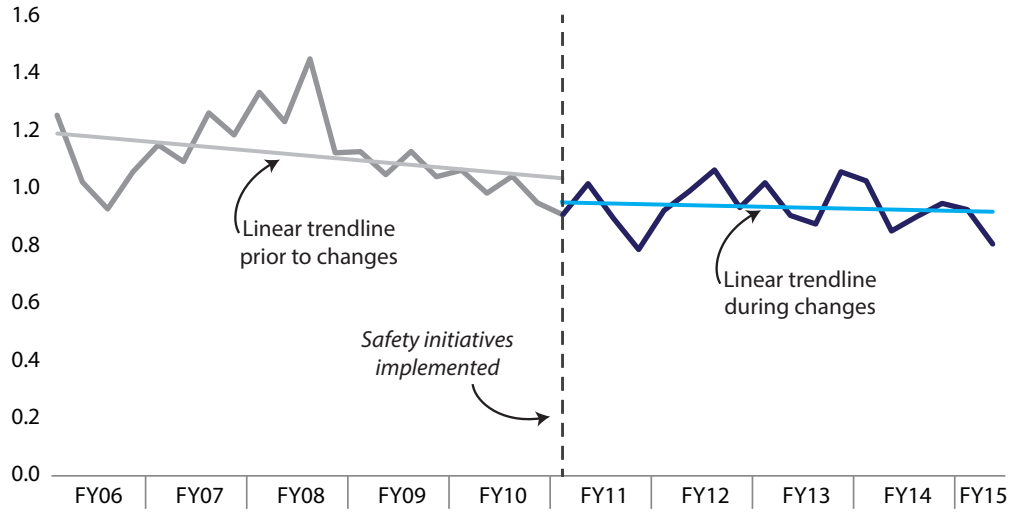
To help us understand what information could be gleaned from the Department's violent infraction rate data, we looked at whether it showed an overall trend change following the introduction of the staff safety initiatives. **Exhibit 7** charts system-wide violent infraction data for fiscal years 2006 through 2014 (see **Appendix F** for infraction rates at the facility level). While there is a downward trend over the eight-year period, there does not appear to be a significant change in the overall trend after the start of the staff safety initiatives. Because there are so many factors that can cause violent infractions to occur, this measure does not allow the Department to adequately evaluate the effectiveness of the safety initiatives.

We also looked at three categories of offender violence infractions against staff

Violent infraction categories

- Offender aggravated assault on staff
- Offender assault on staff
- Offender sexual assault on staff
- Offender aggravated assault on another offender
- Offender assault on another offender
- Offender sexual assault on another offender
- Offender fighting
- Offender possession of a weapon

Exhibit 7 - Violent infractions per 100 offenders



Source: Auditor prepared using data from the Department of Corrections.

– aggravated staff assaults, staff assaults, and staff sexual assaults – for this same time period for all 12 facilities. We found that the rate of these infractions per 100 offenders was so small, it was difficult to identify significant changes over time. We agree that is important information for Department executives and managers to collect and review, but it would be even more valuable if additional goals and measures were created to allow them to determine how the staff safety initiatives impact staff safety. The Department's efforts in this area with measuring the effect of Operation Place Safety on aggravated staff assaults, and the use of pepper spray on staff injuries are good examples.

The Department could develop specific goals and measures for additional staff safety initiatives. These additional goals and measures could focus on indicators that show whether staff understand the initiatives and if the initiatives are being followed. For example, to address staff accountability, the Department could establish a goal for how long it should take a facility to account for all staff members and conduct periodic drills to see if facilities can meet that goal. If they cannot, information gained from conducting the drills would help Department managers understand why they are falling short. Another example could address activities in the Security Advisory Committees. Specifically, they could develop goals for how quickly managers respond to staff on the status of their security suggestions. Evaluating how well they meet that goal would provide the information needed to change their process to shorten response times. Most important, goals could be developed for staff satisfaction with the safety initiatives and how safe staff feel while at work. Feedback on these issues could be gathered through periodic staff surveys and focus groups.

While the Department has used data to analyze the specific effect of some initiatives at some of its facilities, much more data collection and analysis are needed to determine how well the initiatives are being carried out and what effects they might have, including whether they have improved how safe staff feel in their work environment and while carrying out their assigned duties. The Department would need clearly defined goals, objectives and measures for each of the safety initiatives, as well as a consistent implementation approach, to assess their effectiveness.

Conclusion

Although the Department's staff safety initiatives are the most comprehensive approach to improving staff safety that has been undertaken by a state prison system, we found there are opportunities for further improvement. We found that while each prison had implemented the initiatives to some degree, not all the initiatives have been fully or consistently implemented. These include making improvements to staff accountability procedures, visibility in certain areas of the prisons, communication between management and staff, and staff search procedures. We also found the Department has not updated its staffing model in several years, and it may not be suited to demands currently made of staff. In addition, we found that while the majority of staff feel safe, less than half feel safer now than when the initiatives were implemented, and less than a quarter think they will feel safer three years from now. Because the Department lacks specific goals and performance measures to help its executives and managers understand how well the staff safety initiatives are working, better performance measurement processes and a more focused approach to evaluating staff safety related practices would help the Department better understand how to continue to improve staff safety.

Recommendations

Based on the results of our audit, we recommend the Department continue its efforts to improve staff safety by determining whether adopting the following recommendations would be beneficial, and implementing those that have the greatest potential to improve staff safety.

1. Address the issues with implementation of the staff safety initiatives our experts identified, including clarifying policies and procedures related to staff accountability, radios for non-custody staff, duress alarm testing, cameras, security specialists, place safety musters and the local security advisory committees.
2. Address the gaps identified by our experts between the Department's safety related policies, procedures and practices, and correctional leading practices. Specifically:
   a) Develop policies, procedures and practices to conduct staff searches.
   b) Evaluate and update the staffing model to ensure staffing levels are adequate and appropriately utilized to meet all the requirements placed on staff.
   c) Develop a more focused approach to monitor and audit the implementation of the staff safety initiatives to provide feedback on how well staff understand and are following relevant policies and procedures.
   d) Evaluate whether making further changes to department policies, procedures and practices to address additional identified gaps would be beneficial, including cell searches, issues with visibility, searching people entering facilities and access to facility control centers.
3. Enhance the Department's current approach to assessing the effectiveness of the staff safety initiatives and how well they have been implemented at the facilities to provide additional opportunities for improvement. To do so:
   a) Develop specific performance goals and measure progress toward meeting those goals.
   b) Conduct periodic, anonymous staff surveys and focus groups to gather staff input on the effectiveness of the safety initiatives and whether they have improved how safe staff feel.
4. Improve staff communication about safety issues. To do so:
   a) Provide additional guidance and training to facilitators to improve the effectiveness of the place safety musters and local and statewide safety advisory committees.
   b) Evaluate whether the benefit of re-establishing shift musters, which allow staff the opportunity to communicate about potential safety concerns before beginning their shift, outweighs the additional staff time and expense it would incur.
   c) Provide more specific guidance for the role of the security specialist to ensure good communication occurs on staff safety issues at the facilities, including ensuring staff receive feedback on the status of their staff safety suggestions.

STATE OF WASHINGTON

March 10, 2016

Honorable Troy Kelley
Washington State Auditor
P.O. Box 40021
Olympia, WA 98504-0021

Dear Auditor Kelley:

We appreciate the opportunity to review and respond to the State Auditor's Office (SAO) performance audit report: "Improving Staff Safety in Washington's Prisons." Our agencies worked together to provide this joint response.

The Department of Corrections (DOC) was pleased that the SAO recognized that our safety initiatives are innovative and unique. As the report notes, "no other state has developed such an advanced and comprehensive group of initiatives focused on improving staff safety." The department promotes a culture that encourages personal responsibility for safety; takes initiative in addressing security deficiencies; and continually monitors security improvements in work areas, practices, procedures, policies and physical layouts. Department staff work with offenders in total and partial confinement facilities, as well as in communities across the state.

DOC has focused on staff training, policies and practices in an effort to support staff in identifying and discussing different points of vulnerability while working in prisons.

Staff responsibilities include working with offenders in unpredictable and often dangerous settings. Despite great personal risk, staff perform these duties with professionalism and pride. They do this because they believe in improving public safety and in working together for safe communities. They are mindful, too, that staff safety is a discipline that must be practiced by everyone at all times.

DOC strives to continually improve its staff safety and security practices, and is always interested in considering opportunities to enhance the safety of our state's prisons. With that in mind, we are providing the attached response to the auditor's recommendations.

Sincerely,

Dan Pacholke
Secretary
Department of Corrections

David Schumacher
Director
Office of Financial Management

Enclosures (2)

cc: David Postman, Chief of Staff, Office of the Governor
Kelly Wicker, Deputy Chief of Staff, Office of the Governor
Miguel Pérez-Gibson, Executive Director of Legislative Affairs, Office of the Governor
Matt Steuerwalt, Executive Director of Policy, Office of the Governor
Tracy Guerin, Deputy Director, Office of Financial Management
Wendy Korthuis-Smith, Director, Results Washington, Office of the Governor
Tammy Firkins, Performance Audit Liaison, Results Washington, Office of the Governor
Jody Becker-Green, Deputy Secretary, Department of Corrections
Stephen Sinclair, Assistant Secretary for Prisons Division, Department of Corrections

Official State Cabinet Agency Response to the Performance Audit on Improving Staff Safety in Washington's Prisons – March 10, 2016

This coordinated management response to the State Auditor's Office (SAO) performance audit report received on February 23, 2016, is provided by the Office of Financial Management and the Department of Corrections (DOC).

SAO Performance Audit Objectives:

The SAO objectives were designed to assess whether the department could do more to ensure the safety and security of its correctional officers by answering:

1. Does the department's prison safety and security program meet industry leading practices and standards, and in areas where it does not, why?
2. Have recent changes in the department's prison safety and security program improved the safety and security of prison staff?
3. What information does the department use to understand whether its program is improving prison staff safety and security, and is the information adequate for managing the program?
4. What additional changes could the department make to improve the safety and security of prison staff?

SAO Conclusion:

The department's staff safety initiatives are innovative and unique.

SAO Findings:

1. Staff feedback points to need to improve communication.
2. There are opportunities to improve implementation of staff safety initiatives.
3. Gaps exist between correctional leading practices and those used by the department.
4. The department needs more specific performance goals and measures to improve the effectiveness of its staff safety initiatives.

SAO states that based on the results of its audit, DOC should continue efforts to improve staff safety by determining whether adopting the following recommendations would be beneficial and implementing those that have the greatest potential to improve staff safety**.**

SAO Recommendation 1: Address the issues with implementation of the staff safety initiatives our experts identified, including clarifying policies and procedures related to staff accountability, radios for non-custody staff, duress alarm testing, cameras, security specialists, place safety musters, and the local security advisory committees.

STATE RESPONSE:

The items listed in this recommendation by SAO are already embedded in agency policy, staff position descriptions or in the strategic deployment process. For example, security cameras have been added and will continue to be added as funding becomes available. As noted by the auditors, the department was awarded funds in the 2013-15 and 2015-17 biennia to continue its camera installation initiative. DOC reviews its policies on a regular basis to determine where updates are needed and has a process for initiating urgent policy reviews when emergent issues arise.

Action Steps and Time Frame

- DOC will conduct a focused review of its policies pertaining to these specific security issues (staff accountability, radios for non-custody staff, duress alarm testing, duties of security specialists, place safety musters and local security advisory committees) in advance of its regularly scheduled policy review periods, and clarify policy expectations as needed. *By July 1, 2016.*
- DOC will ensure inclusion of these specific security issues in its regular auditing process to ensure consistency in application and practice. *By July 1, 2016.*

SAO Recommendation 2: Address the gaps identified by our experts between the department's safety related policies, procedures and practices and correctional leading practices. Specifically:

a. Develop policies, procedures and practices to conduct staff searches.

b. Evaluate and update the staffing model to ensure staffing levels are adequate and appropriately utilized to meet all the requirements placed on staff.

c. Develop a more focused approach to monitor and audit the implementation of the staff safety initiatives to provide feedback on how well staff understand and are following relevant policies and procedures.

d. Evaluate whether making further changes to department policies, procedures and practices to address additional identified gaps would be beneficial, including cell searches, issues with visibility, searching people entering facilities and access to facility control centers.

STATE RESPONSE:

DOC acknowledges certain gaps between the department's safety-related practices and those characterized by the SAO's experts as "correctional leading practices." However, DOC believes it can use its established policy and procedural review tools to evaluate the extent to which such gaps might impact staff safety.

Staff searches

DOC disputes the assertion that staff searches are a "correctional leading practice" as defined by SAO and its experts. A recent survey conducted by the Association of State Correctional Administrators (ASCA) reported that less than half of states conduct staff searches. Many of DOC's higher-custody prisons use a system for random searches of staff entering prisons. The auditors note this as an inconsistency that raises the risk of contraband introduction, but it is not clear to what extent this may be true because as the auditors also note, the department is

recognized by ASCA's Performance Based Management System as maintaining a rate of institutional violence lower than many states. However, the department acknowledges the importance of considering the issue of contraband in its correctional facilities.

Staffing model

DOC is interested in increasing staffing to support prison operations. The staffing model was last updated in 1988. However, it should be noted that since 2011, the staffing model for custody staff has been enhanced several times as a direct result of requests made through the local and statewide security advisory committees to address safety concerns. This included funding positions in the 2013-15 operating budget for more staffing in medium-custody units on second shift and an additional eight-hour, seven-days-per-week (8/7) post on first shift at stand-alone minimum custody facilities.

Policy reviews and audits

DOC has a well-established process for reviewing and updating agency policies. All staff have the ability to inform agency policy. Prison policies adhere to standards of the American Correctional Association and National Institute of Corrections. DOC also has a comprehensive audit system for reviewing and addressing gaps in prison operations. These coordinated agency audits already address many of the safety initiatives reviewed by SAO.

Action Steps and Time Frame

DOC will:

- Evaluate the need to expand the random search procedures conducted at some high security prisons to other facilities. *By Dec. 31, 2016.*
- Submit a decision package to OFM for funding of an external evaluation of its custody staffing model. *By Sept.30, 2016.*
- Ensure inclusion of the specific security items (cell searches, issues with visibility) in their regular auditing process to ensure consistency in application and practice. *By July 1, 2016.*
- Evaluate the need for changes to policies, procedures and practices for cell searches, issues with visibility, searches of people entering the facilities and access to facility control centers. *By July 1, 2016.*

SAO Recommendation 3: Enhance the Department's current approach to assessing the effectiveness of the staff safety initiatives and how well they have been implemented at the facilities to provide additional opportunities for improvement. To do so:

a. Develop specific performance goals and measure progress toward meeting those goals.

b. Conduct periodic, anonymous staff surveys and focus groups to gather staff input on the effectiveness of the safety initiatives and whether they have improved how safe staff feel.

3

STATE RESPONSE:

DOC appreciates the SAO's overview of the department's performance-based approach to staff safety, including its use of violent infractions as a key performance measure, tracking of security concerns/suggestions to monitor progress of staff safety activities and participation in ASCA's Performance Based Management System (which shows Washington is below average in offender violence against staff). While DOC believes these are relevant and reliable measures of staff safety, the department recognizes SAO's conclusion that they are not specific enough to measure a particular staff safety initiative. DOC appreciates the SAO noting the measures DOC has in place for Operation Place Safety (OPS) and oleoresin capsicum (OC) as examples of specific measures for particular staff safety initiatives. However, DOC believes the auditors overlooked the dynamic nature of these and other specific measures of the staff safety initiatives, as well as surveys and focus groups related to staff safety.

Also, DOC would like to note that the staff safety initiatives were implemented as a series of interventions, some of which were piloted and then expanded. The focus was to make improvements to staff safety and build on those improvements by using established performance measures such as violent infractions and by creating additional metrics relevant to the staff safety initiatives. This SAO recommendation supports our efforts in this area.

Prison violence

As noted by the auditors, the department uses prison violence — specifically, the rate of violent infractions — as one way to measure the safety of prisons. Prison violence is a key performance measure in both Results DOC — the agency's performance management framework — and the Governor's Results Washington performance management system. A display of DOC's prison violence performance measure can be found in Appendix A of this response.

The department has mostly met its prison violence performance target. For example, the rate of violent infractions has trended downward and remained mostly below its target of 1.00 violent infractions per 100 offenders. DOC has maintained the rate of violent infractions in its performance target even as the department closed several prisons, which increased the density of an offender population characterized by a mostly violent criminal profile. For example, McNeil Island Corrections Center, a major facility located in Pierce County, was closed in early 2011, which required the department to shift its offender population to other facilities.

Washington ranks 41st in the nation for rate of incarceration. This means the offenders who come to prison here are typically serving sentences for more serious and violent crimes than those in other states. This important context is largely ignored by the auditors in their analysis of DOC's prison violence performance measure. They found that the rate of violent infractions before and after the staff safety initiatives were implemented in 2011 did not show a significant change. This may be true, but it also lacks context to evaluate any counter effects on prison safety such as prison closures. Thus, DOC agrees with SAO that data on violent infractions may be too general to accurately measure the staff safety initiatives, but it takes issue with the minimal consideration given to a meaningful performance measure that still suggests prison safety has improved over time.

Operation Place Safety

DOC recognizes that using prison violent infractions as a measure is more effective at gauging the frequency rather than the severity of violence. For example, prison violence is measured by several kinds of violent infractions, and does not differentiate between those violent acts that may be more harmful than others. This is the exact reason for OPS, which seeks to deter the violent acts that pose the greatest risk to staff safety.

The auditors misattribute the purpose of OPS as seeking to reduce violence rather than explaining its more precise focus on certain violent acts: staff assault, fight/assault with a weapon and multi-offender fight/assault. These violent acts result in an enhanced staff response, including loss of privileges for both the offender who committed the violent act (perpetrator) as well as the offenders who influenced their behavior (close associates). OPS is the first prison application of the evidence-based community Ceasefire model, a street-based group violence reduction strategy. Several other state correctional agencies have expressed interest in or have implemented OPS in their systems. DOC's partner in the design of OPS — the National Network for Safe Communities, out of John Jay College of Criminal Justice in New York — features OPS as a promising practice on its website.

DOC designed and piloted OPS in the Washington State Penitentiary's (WSP) high-security units in late 2012. A preliminary evaluation by DOC found violent acts decreased by almost 50 percent at WSP in the first year of OPS implementation. OPS was expanded to DOC's other high-security facility, Clallam Bay Corrections Center (CBCC), in late 2014.

As noted by the auditors, DOC has specific measures for OPS to evaluate its efficacy, such as the number of aggravated staff assaults. DOC appreciates the auditors noting this outcome measure and the preliminary evaluation as supporting evidence for expansion of OPS to CBCC. However, the auditors provide little context for how the targeted implementation at WSP may have contributed to a reduction of violent acts statewide. For example, in fiscal year 2012, there were 11 aggravated staff assaults statewide, and WSP accounted for 90 percent of them. There were six aggravated staff assaults in FY 2014 statewide, and WSP accounted for half of them. This equates to almost a 50 percent reduction in aggravated staff assaults statewide and a 70 percent reduction at WSP. See Table 1.

Table 1. FY 2012 and FY 2014 Violent infractions with staff assault type breakout

FY 2012				FY 2014			
Facility	Violent Infractions*	Aggravated Staff Assaults**	Staff Assaults	Facility	Violent Infractions*	Aggravated Staff Assaults**	Staff Assaults
DOC***	1934	11	153	DOC***	1827	6	125
AHCC	240	0	5	AHCC	206	0	5
CBCC	129	0	5	CBCC	163	0	6
CCCC	26	0	0	CCCC	15	0	0
CRCC	331	0	6	CRCC	307	0	2
LCC	30	0	1	LCC	56	0	3
MCC	244	0	59	MCC	252	3	48
MCCCW	19	0	0	MCCCW	28	0	1
OCC	30	0	2	OCC	21	0	1
SCCC	157	0	12	SCCC	161	0	18
WCC	241	1	21	WCC	216	0	18
WCCW	99	0	5	WCCW	106	0	6
WSP	388	10	37	WSP	296	3	17

* Top eight violent infractions are guilty and reduced findings for the following WAC Violations: 502 - AGGRAVATED ASSAULT/INMATE, 505 – FIGHTING, 602 - POSSESS WEAPON, 604 - AGGRAVATED ASSAULT/STF, 611 - SEXUAL ASSAULT STAFF, 633 - ASSAULT/OFFENDER, 635 - SEXUAL ASSAULT/OFFENDER, 704 - ASSAULT (ASSAULT STAFF)
** Aggravated staff assaults are those that involved staff injury or hospitalization, or the use of a weapon.
*** DOC agency-wide totals include staff assaults and aggravated staff assaults

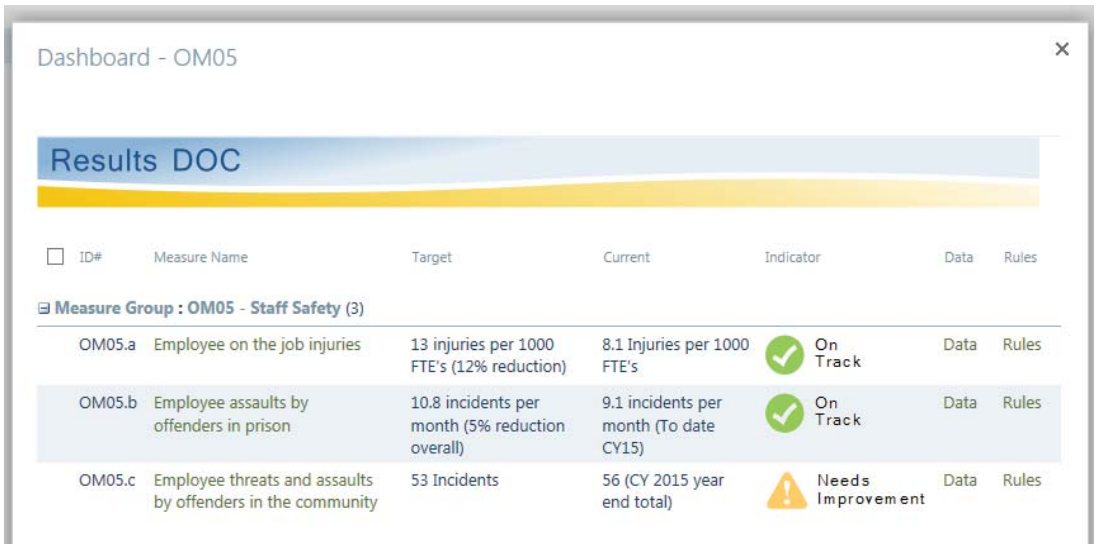
DOC also has a system to track the use of the enhanced response at both CBCC and WSP to monitor OPS activities. See Figure 1.

Figure 1. Enhanced Response Tracker for OPS

Results DOC

DOC has several performance measures specific to staff safety that are monitored through Results DOC in alignment with Results Washington. See Figure 2 for a snapshot of the Results DOC dashboard, which monitors the status of measures specific to staff safety.

Figure 2. Results DOC dashboard — staff safety performance measures



Security concerns/suggestions

As noted by the auditors, DOC monitors security concerns/suggestions as well as their status. See Table 2 below.

Table 2. Security concerns/suggestions status statewide

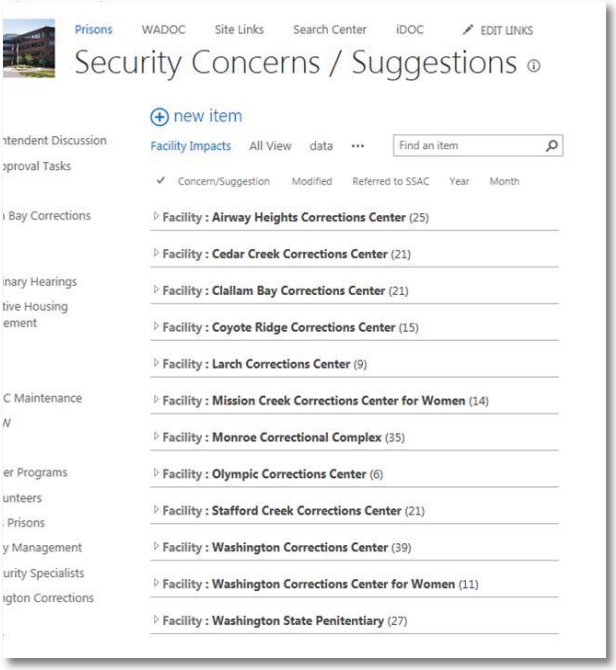
Year	Total Received	Completed at Local Level	Referred Statewide	Completed Statewide
2011	548	488	40	32
2012	714	626	39	24
2013	756	693	15	12
***2014**	466	285	11	4
Total	**2,484**	**2,092**	**105**	**72**

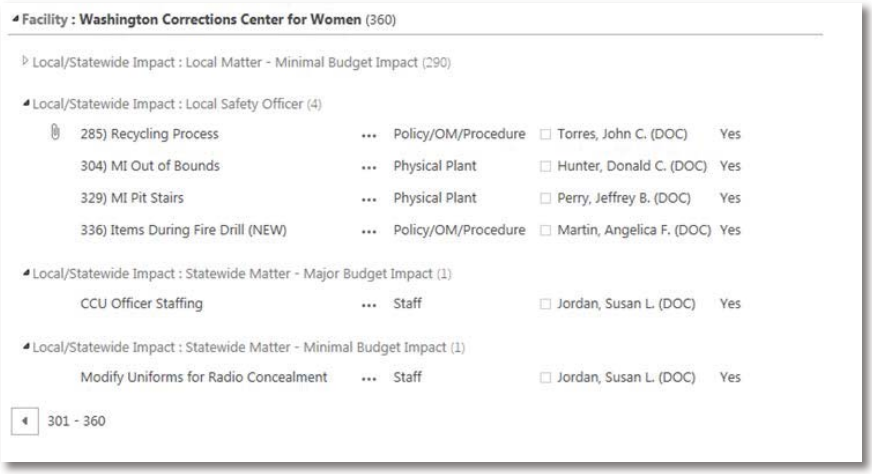
*As of November 2014

However, DOC's use of security concerns/suggestions as a performance measure is more dynamic than described by SAO. For example, in addition to measuring the number of security concerns/suggestions and their status, DOC assesses the types of resolution received with each individual suggestion or concern, the timeliness of the responses, the complexity of the items and the relative resources required to address each item. Each of the security concerns, steps taken and

resolutions are viewable by all staff in the Prisons Division. See Figure 3 below for a display of security concerns tracking, along with details to monitor their status.

Figure 3. Security concerns/suggestions screenshot with drill-down





Annual employee survey

The department conducts an annual employee survey and, in 2013, specific questions were added on staff safety. These questions ask staff to assess the following statements:

- My workplace has meaningful discussions on how to improve security/staff safety.
- I know how to report safety and security hazards or concerns.
- Security practices have been improved in my work area.

These questions remain part of the annual employee engagement survey. The survey results are used to plan meaningful, achievable goals and initiatives to support employee engagement. As a result of more focused efforts to improve employee participation in the survey, 84 percent of

DOC employees responded to the 2015 survey, and there were more positive responses to the staff safety questions than in the previous year. This contradicts conclusions drawn from the SAO's own survey of DOC employees. The SAO survey received only a 20 percent response rate, and the audit inexplicably concludes that higher response rates would have resulted in less-positive results. DOC survey results for the past three years are shown in Appendix B.

Place safety musters

Place safety musters were inspired by the success of the security forums (2011–12) which increased communication on security and safety issues in work areas at all facilities. A description of the security forum structure is shown in Appendix C. Place safety musters are held monthly and support the department's culture of staff safety. They formalize the expectation that supervisors meet with all employees who interact and work in their areas; strongly encourage individuals to voice their concerns and vulnerabilities in small multidisciplinary focus groups; and provide a recognized/formalized forum to facilitate such discussions. DOC created Policy 420.010 in 2012 to support this practice and provide supervisors the structure and time to develop staff awareness on personal safety and the safety of others. Several job aids, such as "Safety on the Line" pocket guides, which emphasize good security routines, and vulnerability exercise workbooks designed to capitalize on current and enhanced safety practices were created as part of this initiative.

The status of DOC security initiatives is captured in an annual report to the Legislature. See Appendix D for the 2015 report.

Action Steps and Time Frame

- DOC will explore additional performance measures specific to the staff safety initiatives for inclusion in its performance measurement system. *By Oct. 1, 2016.*
- DOC will explore opportunities to use results from the staff safety questions in the annual employee survey to enhance the staff safety initiatives. *By Oct. 1, 2016.*

SAO Recommendation 4: Improve staff communication about safety issues. To do so:

a. Provide additional guidance and training to facilitators to improve the effectiveness of the place safety musters, and local and statewide safety advisory committees.

b. Evaluate whether the benefit of re-establishing shift musters, which allow staff the opportunity to communicate about potential safety concerns before beginning their shift, outweigh the additional staff time and expense it would incur.

c. Provide more specific guidance for the role of security specialist to ensure good communication occurs on staff safety issues at the facilities, including ensuring staff receive feedback on the status of their staff safety suggestions.

STATE RESPONSE:

DOC agrees with the SAO on the importance of effective communications, and has resources dedicated to engaging and informing staff through a variety of mediums. As the auditors note, DOC published "Keeping Prisons Safe: Transforming the Corrections Workplace" so staff could consider safety models from other fields in the corrections area, and its accompanying field guide,

which offers exercises and discussion guides for putting theories about safety into action. The book and field guide are used as a foundation for the prison safety curriculum. DOC also appreciates the auditors' review of strengths and weaknesses associated with place safety musters and security advisory committees, which presents an opportunity to improve the facilitation of these communication structures. For contents of these publications, see Appendix Items E and F.

Security advisory committees

Security advisory committees, which comprise local and statewide committees, empower facility staff to identify security gaps and provide avenues for addressing them.

Local security advisory committees (established by all 12 prisons in 2011) meet monthly. These committees are chaired by facility captains or lieutenants, and include staff from various disciplines who discuss security concerns/suggestions submitted by staff.

The statewide security advisory committee (established in June 2011) meets regularly to evaluate security concerns/suggestions that may affect department policy or require legislative funding. The committee's work includes evaluating and making recommendations or taking action on security concerns affecting statewide policies or practices, as well as assisting in the development of an additional safety curriculum presented to staff during the annual in-service training for the Prisons Division.

The security concerns/suggestions and their status are viewable by all staff in the Prisons Division.

Shift musters

As the auditors note, shift musters were eliminated due to a legal settlement. Currently, staff have a 10-minute "pass-down" (opportunity to share information) with each other as they exchange equipment. There is also a prescribed list of items each staff member checks at the beginning and throughout a shift to stay informed. DOC is interested in exploring additional communication structures, such as shift musters, to improve communication on staff safety.

Security specialists

Every facility has at least one security specialist. These staff members are responsible for post orders coordination, staff accountability management, place safety muster tracking, security concern/suggestion tracking and quality assurance. They also take a lead role in facilitating local security advisory committee meetings. These responsibilities and duties are addressed in position descriptions for security specialists at each facility. As such, DOC feels that supporting the role of security specialists will improve communication in a number of ways.

Action Steps and Time Frame

- DOC will explore ways to improve communication structures such as place safety musters, as well as local and statewide security advisory committees. *By Oct. 1, 2016.*
- DOC will conduct a fiscal analysis of the costs associated with re-establishing shift musters. *By May 30, 2016.*
- DOC will re-affirm the role of the security specialist in alignment with the position description and related policies. *By Dec. 1, 2016.*

Appendix Items A-F

Note: The agency response to this performance audit included an additional 65-page document, which may be viewed on the Department of Corrections website at:
http://www.doc.wa.gov/aboutdoc/measuresstatistics/docs/OfficialStateCabinetAgencyResponse-PerformanceAudit-ImprovingStaffSafety.pdf

Appendix A: Initiative 900

Initiative 900, approved by Washington voters in 2005 and enacted into state law in 2006, authorized the State Auditor's Office to conduct independent, comprehensive performance audits of state and local governments.

Specifically, the law directs the Auditor's Office to "review and analyze the economy, efficiency, and effectiveness of the policies, management, fiscal affairs, and operations of state and local governments, agencies, programs, and accounts." Performance audits are to be conducted according to U.S. Government Accountability Office government auditing standards.

In addition, the law identifies nine elements that are to be considered within the scope of each performance audit. The State Auditor's Office evaluates the relevance of all nine elements to each audit. The table below indicates which elements are addressed in the audit. Specific issues are discussed in the Audit Results and Recommendations sections of this report.

I-900 element	Addressed in the audit
1. Identify cost savings	**No.** The audit focused on improving staff safety at the state's prisons, not on cost savings.
2. Identify services that can be reduced or eliminated	**No.** The audit focused on improving staff safety, not on whether services could be reduced or eliminated.
3. Identify programs or services that can be transferred to the private sector	**No.** The audit focused on evaluating the Department's staff safety initiatives, and did not look at outsourcing of programs or services.
4. Analyze gaps or overlaps in programs or services and provide recommendations to correct them	**Yes.** The audit focused on evaluating the Department's staff safety initiatives and did identify potential gaps in those initiatives that could affect staff safety.
5. Assess feasibility of pooling information technology systems within the department	**No.** The audit focused on evaluating the Department's staff safety initiatives. The feasibility of pooling IT systems was not relevant to the audit objective.
6. Analyze departmental roles and functions, and provide recommendations to change or eliminate them	**Yes.** The audit reviewed roles and functions related to prison safety, recommending changes to improve staff security and reduce the likelihood of harm to staff.
7. Provide recommendations for statutory or regulatory changes that may be necessary for the department to properly carry out its functions	**No.** The audit does not recommend regulatory or statutory policy changes.
8. Analyze departmental performance, data performance measures, and self-assessment systems	**Yes.** The audit recommends the Department make improvements to its process to evaluate and measure the effect of its staff safety initiatives in improving staff safety.
9. Identify relevant best practices	**Yes.** The audit identified best practices to use in evaluating the Department's policies, procedures and practices relevant to staff safety.

Appendix B: Scope and Methodology

Our audit was designed to determine whether the Department's safety initiatives have improved the safety of staff who work in the state's prisons, and to identify areas where the Department could further improve staff safety.

We used a variety of methods to conduct this audit, because layering different methodologies provides more robust evidence on which to develop our audit findings, draw conclusions and make recommendations. For this audit, we hired subject matter experts from the field of corrections to assist us; information on the background and experience of our subject matter experts can be found in **Appendix C**. To answer our audit question, our experts:

- Identified relevant correctional leading practices to evaluate both the Department's staff safety initiatives and its staff safety related policies, procedures and practices to identify areas for further improvements
- Conducted a survey of all staff employed in the Department's 12 facilities to gather their perspectives on the effectiveness of the staff safety initiatives and how safe they feel in their work environment
- Conducted multiple focus groups at each of the 12 facilities to determine whether staff were knowledgeable about the staff safety initiatives, if the initiatives have been effective, if staff felt safe in their work environment, and what else the Department could do to improve staff safety
- Visited each of the 12 facilities to interview facility executives, managers and staff to gather their perspectives on staff safety; and to physically observe staff carrying out their duties related to the staff safety initiatives. This information helped us assess whether the initiatives have been adequately designed and implemented across the 12 facilities.
- Identified the performance management information the Department uses to assess its progress on improving staff safety, and evaluated whether it was sufficient for the Department to understand the effectiveness of its staff safety initiatives
- Applied their expertise to the evidence gathered to draw conclusions and develop recommendations to further improve the safety of the Department's prison staff.

Correctional subject matter experts were hired

We conducted a procurement to hire correctional subject matter experts to assist us with designing and conducting this audit. Our evaluation team included the Department's Assistant Secretary for Prisons, our methodologist and our staff assigned to the audit. In our request for proposals, we stated that the objective of our audit was to assess whether the Department could do more to ensure the safety and security of its prison staff. Specifically, we asked proposers to design an approach to answer the following questions:

1. Does the Department's prison safety and security program meet industry leading practices and standards, and in areas where it does not, why?
2. Have recent changes in the Department's prison safety and security program improved the safety and security of prison staff?
3. What information does the Department use to understand whether its program is improving prison staff safety and security, and is the information adequate for managing the program?
4. What additional changes could the Department make to improve the safety and security of prison staff?

Once we hired our subject matter experts, we worked with them to finalize an audit approach and work plan to address the audit questions. We asked our experts to evaluate how well the staff safety initiatives were designed and implemented, and to evaluate the Department's staff safety policies, procedures and practices to identify any significant gaps against correctional leading practices. We also asked them to evaluate whether the Department collects and analyzes appropriate performance management information to help executives and managers understand whether the staff safety initiatives are improving staff safety and to help improve the initiatives. Upon completion of the audit work, we determined the best way to report the results of our work would be to focus on answering the overall question of whether the Department's staff safety initiatives have improved the safety of prison staff.

Experts analyzed facility practices in comparison with correctional leading practices

To identify correctional leading practices most relevant to staff safety, our experts used their professional expertise to select practices relevant to the scope of the audit, with specific attention given to the practices critical to effectively managing staff safety and security in prison settings.

Our subject matter experts used the following six sources to develop leading practices to evaluate the Department's staff safety related policies, procedures and practices, and its staff safety initiatives.

- *American Correctional Association (ACA) Standards for Adult Correctional Institutions*, 4th Edition
- *The Security Audit Program, A How-To Guide and Model Instrument for Adaptation to Local Standards, Policies, and Procedures,* U.S. Department of Justice, National Institute of Corrections, September 2013
- *American Correctional Association, Standards for Correctional Training Academies,* First Edition, May 1993
- *U.S. Immigration and Customs Enforcement Performance-Based National Detention Standards,* 2008
- *Prison Staffing Analysis, A Training Manual, with Staffing Considerations for Special Populations,* U.S. Department of Justice, National Institute of Corrections, December 2008
- National Major Gang Task Force, Security Threat Group Analysis Criteria

A complete set of those practices identified by our experts can be found in **Appendix D**.

To evaluate the Department's and each of its facilities' consistency with the identified leading practices, our experts conducted a four-step process that:

- Compared the leading practices to the Department's written policy
- Compared the leading practices to any additional guidance found in each facility's operational memoranda
- Conducted on-site observations and assessments of how well staff at each facility carries out the practices, including a more in-depth assessment of the facilities' operational memoranda
- Developed an overall assessment of the Department's and each facility's adherence to the leading practices

Each leading practice area was assigned to the subject matter expert with the most experience in that area. Once the subject matter experts completed their assessments, other subject matter experts reviewed those assessments to determine whether they reached the same conclusion. We then reviewed all the leading practice assessments completed by the subject matter experts to ensure the leading practices were consistently applied to each facility.

The subject matter experts assigned one of three levels to designate how consistent the Department and each facility was with each leading practice area, including:

- ***Green:*** Substantially Consistent/Complete: All or most of the key elements of the leading practices are addressed. No or very minor risk to staff safety.
- ***Yellow:*** Partially Consistent/Complete: Some of the key elements of the leading practices are addressed, but some important aspects are missing. Moderate risk to staff safety.
- ***Red:*** Inconsistent/Incomplete: Few or none of the key elements of the leading practices. Serious risk to staff safety.

For those areas rated either red or yellow, our subject matter experts identified the specific gaps between the Department's policies, procedures, and practices and the leading practices.

Surveys gathered prison staff perspectives on the initiatives' effectiveness and their safety

We surveyed all staff employed at the 12 state prisons in October 2014. The purpose of the survey was to gather staff perspectives on the effectiveness of the staff safety initiatives and to determine how they felt about their own safety, that of their co-workers and of their work environment. The subject matter experts conducted the survey using Survey Monkey, an online survey tool. All staff received an email from our subject matter experts with a link to the survey. The email explained the survey's purpose and that they were conducting it for the State Auditor's Office. The email stated their responses would remain anonymous and would go directly to the Criminal Justice Institute. A second reminder email was sent to all staff as well.

The Department also notified its prison staff about the audit and the survey, and provided staff time and computer access to respond to the survey. The union that represents prison correctional officers also emailed its members on our behalf to inform them of the purpose of the audit and the survey, and encouraged them to respond. Staff could also respond to the survey from computers outside of their work environment by using the provided link.

A total of 5,303 employees received the email inviting them to respond to the survey. Of those, 1,112 completed the survey, a response rate of 21 percent. We found that this rate is typical for voluntary online surveys from an external entity. Survey Monkey, the online tool we used to create the survey, reports that online surveyors with no prior relationship with the recipients should expect a response rate only as high as 20 to 30 percent.

To determine how representative the respondents were of all prison staff, we asked the Department for staff demographic information as of October 2014. We compared the characteristics of the survey respondents to the entire prison staff population using this information and found that women, non-custody staff, older staff and staff who had worked at the Department for a long time were over-represented. We also found that these respondents feel safer on average than their counterparts.

As with all voluntary surveys, there is the possibility of response bias. Therefore, we did not weight any of the responses to reflect the demographic characteristics of the prison staff population. If we had done so, responses would have been less positive than our survey results suggested, because employees who were more likely to give more positive perceptions of safety were overrepresented.

Despite these limitations, we found the survey results to be consistent with the results of our focus groups and the observations of our experts during their site visits, providing further validation that the survey results are representative of overall staff perceptions of safety and the safety initiatives at the time the survey was conducted.

Staff participated in focus groups at all 12 prisons

To gather staff perspectives on the effectiveness of the staff safety initiatives and how safe they feel, we conducted a total of 42 focus groups at the 12 prisons. This included two focus groups at each of the four stand-alone minimum custody facilities, and four focus groups at the eight major facilities except Monroe Correctional Complex, where we conducted six focus groups.

At the major facilities, we conducted one focus group with non-uniformed employees, one with sergeants and two groups with correctional officers. At Monroe Correctional Complex, one additional focus group consisted of sergeants and another of correctional officers. At the stand-alone minimum custody facilities, we conducted one focus group with correctional officers and another with non-uniform staff.

Each focus group contained eight to 10 employees drawn at random. Participation was optional. If a selected employee chose not to attend a focus group, a replacement was also selected at random.

We asked the following five questions at each of the focus groups, along with follow-up questions depending on the issues participants raised.

1. Are you aware of changes that have been made to improve staff safety at this facility? Can you name them? Are they policies, procedures, physical plant changes? Equipment changes? System changes?
2. How do you know whether or not the changes have made the facility safer? How would you measure a positive change?
3. Have any of those changes made a positive difference in safety? If yes, in what regard? If not, why not, and what might be changed to improve their effects?
4. In your opinion, what additional measures should be taken to improve staff safety at this facility?
5. Do you feel safe during your workdays at this facility? If not, why not?

We documented the responses for each of the 42 focus groups for each of the five questions. We analyzed the results by facility type and focus group makeup to look for similarities and differences. Our analysis found consistency in participant responses across facilities and with the staff survey results.

Experts assessed the staff safety initiatives' effectiveness

To assess the effectiveness of the Department's staff safety initiatives, our experts focused on evaluating how well the initiatives had been designed and implemented. To identify the staff safety initiatives developed and implemented by the Department, we reviewed policies and procedures, reports and other documentation the Department provided. We also interviewed executives, managers and staff responsible for the initiatives' design and implementation.

To assess how well the initiatives had been designed and implemented, our experts compared Department policies and facility procedures to leading practices; directly observed them in practice at each facility; gathered staff perspectives from the survey, focus groups and on-site interviews; and applied their collective professional expertise to draw conclusions. They did this by developing summaries of their observations at each facility and discussing their conclusions until they had reached a consensus. The results of their assessment at each facility were used to draw an overall conclusion for each staff safety initiative on how well it had been designed and implemented by the Department. We further reviewed our experts' conclusions to ensure they were consistent across the facilities.

Experts visited all 12 state prisons

Between December 2014 and April 2015, our experts visited all 12 Washington state prisons. As explained above, during those site visits, they reviewed facility policies and procedures, and other documentation; conducted focus groups with staff; interviewed staff; and directly observed practices to assess the Department's staff safety related facility policies, procedures and practices, and staff safety initiatives. Physical observations to confirm understanding are critical to drawing appropriate conclusions. We included visits to all 12 facilities because they each have unique characteristics that affect staff safety. In addition, the expertise of our subject matter experts allowed us to gather information we otherwise would not have been able to because our experts understood what they were seeing. We accompanied our experts on their 12 site visits.

Department performance information was identified and assessed

The Department relies on several different sources of performance information to monitor staff safety and understand how well its staff safety initiatives are working. To identify what management information the Department uses to evaluate its staff safety initiatives, we interviewed Department executives, managers and staff to understand what data they collect, how it is analyzed and how it is used.

One of the primary measures they use to understand whether the initiatives are improving staff safety is changes in offender violent infraction rates overall and at each facility, including a sub-group of violent infractions focused on offender assaults against staff. We analyzed this data by comparing changes in the infraction rates to the timing of the implementation of the staff safety initiatives. We also talked to Department executives and managers about how they use this data to assess the initiatives' results, and other data they look at to understand if their staff safety initiatives and programs are working.

Department executives and managers also said they used information from their internal operational reviews, and the number of staff security suggestions that have been suggested and resolved, to understand how well the staff safety program is working. The Department also has two focused efforts to use data to assess the effectiveness of its Operation Place Safety pilot project, and whether the increased use of pepper spray has reduced staff injuries.

To assess the adequacy of the Department's staff safety performance measurement efforts, we compared the measures described by Department executives and managers to the staff safety initiatives to determine whether the measures would provide the type of information needed to understand if the staff safety initiatives are having their intended effects. We found that while the Department collects helpful and meaningful performance information, it lacks the kind of specific goals and measures needed to understand whether the initiatives have been effective in improving staff safety.

Appendix C: Subject Matter Experts

We would like to thank the subject matter experts from the Criminal Justice Institute for their assistance on this audit:

- Dr. George M. Camp, co-president, Criminal Justice Institute, Inc.
- Ms. Camille Graham Camp, co-president, Criminal Justice Institute, Inc.
- Dr. Patricia L. Hardyman, principal, Criminal Justice Institute, Inc.
- Mr. Gary D. Maynard, principal, Criminal Justice Institute, Inc.
- Mr. Wayne T. Choinski, senior associate, Criminal Justice Institute, Inc.
- Mr. Michael T. Maloney, former commissioner, Massachusetts Department of Correction
- Ms. Joan Palmateer, former prison administrator, Oregon Department of Corrections
- Mr. Larry E. Reid, former deputy director of prison operations, Colorado Department of Corrections
- Ms. Theresa Lantz, former commissioner, Connecticut Department of Correction

George M. Camp

George M. Camp has more than 40 years of experience in correctional management and consulting. He served the public sector from 1962 to 1977 in a variety of positions that included director of the Missouri Department of Corrections; first deputy commissioner of the New York State Division of Criminal Justice Services; assistant commissioner of the New York City Department of Correction; and associate warden of the Federal Prison in Lompoc, California, and the U.S. Penitentiary in Marion, Illinois.

He has conducted and directed operational audits, needs assessments, management studies and strategic planning efforts throughout the country. Most recently, he has been working on a 10-year master plan for the Philadelphia Prison System, a strategic plan for Hawaii's Correctional System, a 500-bed maximum security prison for the Arizona Department of Corrections, and a plan to reduce sick leave at the New York City Department of Correction.

He has also worked with others in the development and implementation of prison performance measures that capture monthly performance measures and facility characteristics, which are used by state prison systems for assessing trends in individual prisons over time and comparing performance in prisons within the same agency as well as with comparable prisons in other state prison systems.

He is the author or co-author of several publications including *The Resolution of Prison Riots; Management of Crowded Prisons; Prison Employees: Corrections Most Valuable Resource; Correctional Contracting: Prison Staffing Analysis – A Training Manual; A Guide to Successful Experiences; Private Sector Involvement in Prison Services and Operations;* and the *Corrections Yearbook*.

Camille Camp

Over the course of her 38-year career, Camille Camp served 16 years in direct field operations, beginning in 1971, in the South Carolina Department of Youth Services' male adolescent maximum security facility as counselor, social worker, unit supervisor, and director of social work services for the intensive care units. In the state's adult agency, she was warden of the men's Maximum Security Center. In Arizona, she was responsible for adult corrections, opening six institutions and founding the agency's training academy. In Philadelphia County, she took operational and administrative responsibility for six years to restructure and re-engineer the system by creating and implementing its body of policies and procedures, developing and building two new prisons, and creating and implementing an offender management information system.

Since joining the Criminal Justice Institute, Ms. Camp has developed expertise in directing and conducting prison staffing analyses, ACA audits, correctional management and treatment needs assessments, operational audits, correctional IT systems, operational programming of new facilities, classification and case management, and correctional contracting. She is also proficient in the management of crowded prisons and development of agency-wide training programs.

In her role as co-executive director of the Association of State Correctional Administrators, she has presided over the development and automation of the Performance Measures System, created and developed its website for conducting the work of the Association, developed and executed programming and orchestration for director trainings, and created robust information sharing methods.

She is the author of *Prison Staffing Analysis: A Training Manual,* published by the National Institute of Corrections and used in staffing training across the country.

She is also the co-author of *Prison Employees: Corrections Most Valuable Resource*, a report for the National Institute of Corrections based on a study funded by the organization.

Patricia L. Hardyman

Patricia L. Hardyman is a principal at the Criminal Justice Institute. She has an undergraduate degree in psychology and sociology from Miami University, Oxford, Ohio. She received her master's degree in criminal justice from the University of Cincinnati and her doctorate, also in criminal justice, from Rutgers University's School of Criminal Justice. Before joining the Institute, she was a senior researcher for the Institute on Crime, Justice and Corrections, National Council on Crime and Delinquency, the U. S. Parole Commission, and Ohio Department of Rehabilitation and Corrections.

Dr. Hardyman has nearly 25 years of experience designing, assessing, validating, and implementing institutional and community-based (both probation and parole systems) classification/risk assessment systems for county, state and federal correctional agencies. She has authored/co-authored several classification related publications for the National Institute of Corrections and served as a trainer for sponsored classification trainings. She serves as the system administrator for the Association of State Correctional Administrators' Performance-Based Measures System. In this role, she works with the Performance Measures Committee to develop and update the counting rules; provides technical assistance and training for users; serves as the liaison to the system software; monitors data entry and quality; and participates in the development and planning of the system.

Her recent projects include redesign and validation of the offender custody classification system and development of instruments to identify institutional sexual predators and victims for the Arizona, Oklahoma, Kentucky, Kansas, Nebraska, Maine and Wyoming departments of corrections. She has designed and/or validated the classification systems for the state correctional agencies of Delaware, Florida, Hawaii, Idaho, Iowa, Kansas, Kentucky, Maine, Mississippi, Montana (prison and community supervision), Nebraska (prison and community supervision), New Hampshire, North Carolina, Oklahoma, Oregon, Rhode Island, Tennessee, Virginia, West Virginia and Wyoming. In addition, she has conducted assessments of the classification system for Massachusetts, Nevada, South Carolina, United States Naval Consolidated Brig at Miramar and Wisconsin. Dr. Hardyman also participated in the National Institute of Corrections' internal classification initiative in Colorado, Connecticut, Florida, Missouri, Nebraska, New Jersey, Oregon, South Dakota and Washington, and served as principal investigator for the development and implementation of gender responsive classification systems for state correctional systems. In addition, she conducted a national assessment of the current intake and needs assessment practices among state correctional agencies.

Her classification related work with juvenile agencies includes the Georgia Department of Juvenile Justice (both external and internal classification), Maine Youth Training School and the Cook County Temporary Juvenile Detention Center. For large jail systems, she has also worked with the Philadelphia Prison System, Cook County Detention Center and the Bristol County (MA) Sheriff's Office. She currently serves as the federal monitor for custodial placement for the Orleans Parish Jail.

Gary D. Maynard

Gary D. Maynard entered the corrections profession more than 40 years ago. He has served in the correctional field as the director/secretary of four state departments of corrections across the country (Oklahoma, South Carolina, Iowa and Maryland) since 1987. In addition, his experience spans the operations of various state and federal government systems in positions such as cabinet secretary of the Oklahoma Department of Veterans Affairs, warden of both the Oklahoma State Penitentiary and the Joseph Harp Correctional Center, assistant commissioner of the Arkansas Department of Corrections, and psychologist at the El Reno Federal Reformatory in Oklahoma.

He has a broad knowledge of corrections, including prisons, jails and community corrections. He has worked as security in correctional facilities and as a parole officer in the community, managed federal grants, and served as the executive over personnel and finance in a state correctional system. He has always had an excellent working relationship with criminal justice stakeholders and partners, and enjoyed an excellent working relationship with the legislative leadership in all four states where he managed military and correctional agencies.

He had a military career parallel with corrections for 32 years as a member of the U.S. Army National Guard. He served as Cabinet secretary of Veterans Affairs in Oklahoma, and as the adjutant general of the Oklahoma National Guard. He retired as a brigadier general.

Mr. Maynard taught the undergraduate course "Introduction to Corrections" at the University of Arkansas, the University of Central Oklahoma and the University of Oklahoma. He taught the graduate courses "Leadership" and "Conflict Resolution" at the University of Oklahoma, and taught "Performance Management" in the graduate College of Business at the University of Maryland.

He is a 27-year member of the Association of State Correctional Administrators (ASCA) and served on its Executive Committee. He also is a 40-year member and past president of the American Corrections Association (ACA).

Top honors he has received are the Michael Francke Award from ASCA, the ER Cass Award from ACA, and the Courage and Valor Award from the Oklahoma Department of Corrections. He received the Legion of Merit from the U.S. Army.

Wayne T. Choinski

Wayne T. Choinski is a senior associate with the Criminal Justice Institute who has more than 30 years of experience in the field of corrections. He consults with the Institute in areas including planning, classification, programming and management of maximum security units. Mr. Choinski also works with the National Institute of Corrections as a private contractor providing assistance in the development and implementation of gang management programs. He began his career with the Connecticut Department of Correction as a correctional officer and held positions of correctional lieutenant; correctional captain; unit manager; correctional deputy warden; and director of community enforcement. He was named warden in 2003 and became a regional director for the Department in 2006. As regional director, Mr. Choinski oversaw nine facilities of all classification levels. Mr. Choinski has also had experience with Detention Standards compliance audits for the U.S. Department of Homeland Security, Immigration and Customs Enforcement.

Michael T. Maloney

Michael T. Maloney has 40 years of experience in the corrections field. He served in a number of positions within the Massachusetts Department of Correction, including commissioner, deputy commissioner, superintendent and deputy superintendent. He has also worked as a deputy superintendent and superintendent in a county correctional facility. Through these positions, Mr. Maloney has been responsible for the development and allocation of programs and resources, as well as determination of agency objectives, goals and internal organizational structure.

He has been a guest instructor for the National Institute of Corrections, American Correctional Association, Association of State Correctional Administrators and the National Major Gang Task Force on topics to include disorder management, gang identification and management, prison security, labor relations transition planning and re-entry initiative. He has been an auditor for the American Correctional Association and served as a lead compliance inspector with MGT inspecting facilities holding ICE detainees to determine compliance with ICE National Detention Standards. Since 2007 Mr. Maloney has worked as a correctional consultant. Mr. Maloney is an adjunct professor for the University of Maryland University College, teaching criminal justice courses online.

Joan Palmateer

Joan Palmateer has 34 years of experience working in adult and juvenile corrections. She commenced her career in corrections as a correctional counselor and has worked her way up through the ranks until her retirement in 2010. During her tenure with the Oregon Department of Corrections, she has served in the following roles: assistant director of Oregon Youth Authority, population management/construction administrator, prison administrator, superintendent at Coffee Creek Correctional Facility, first female warden of the Oregon State Penitentiary, chief of security operations, assistant superintendent at Shutter Creek Correctional Institution, security manager at Oregon State Corrections Institution and security manager at Oregon Women's Correctional Center.

Since 1990, she has served as a security consultant for the National Institute of Corrections' Security Audit Program, where she has been instrumental in developing new guidelines for security audits based on best practices used nationwide. She has trained officials in approximately 30 states on how to conduct security audits. As a consultant for NIC, she has either provided technical assistance or conducted reviews based on the needs and requests of correctional agencies. She has even conducted critical incident reviews in some correctional agencies. She developed a vulnerability testing system or "risk assessment" system for Oregon, which she has shared through instruction in other agencies for both juvenile and adult corrections.

Ms. Palmateer has served as expert witness in prison cases and jail cases in various states. She has consulted and provided management and union resolution strategies for agencies. She mentors Oregon Leadership mentees and presents to Leadership Oregon and Leadership Albany on security and passion in the field of corrections.

Ms. Palmateer is currently consulting with two agencies as a correctional expert witness on cases based on current prison management strategies. She and other consultants have just completed a new draft security auditing manual for the National Institute of Corrections.

Larry E. Reid

Larry E. Reid has 28 years of correctional experience that includes: correctional management, facility operations, correctional safety and security standards development, staffing analysis, internal classification, program design and emergency management program development. He held a variety of positions that included: warden of Colorado State Penitentiary, Centennial Correctional Facility, San Carlos Correctional Facility, La Vista Correctional Facility and Trinidad Correctional Facility; and director of support services, which included departmental responsibility for security operations, classification, emergency response and offender transportation. Mr. Reid retired from the Colorado Department of Corrections as the deputy director of prison operations in January 2014.

Over the past 15 years, he has worked nationally and internationally as a subject matter expert for the National Institute of Corrections, and provided consulting and training services in the areas of high security classification, management of special needs and segregated populations, security auditing and security program development, and organizational culture. Larry has co-authored two National Institute of Corrections' Conducting Prison Security Audits Manuals and provided editorial advisory review on the 3rd edition of the *Guidelines for the Development of a Security Program*. As an expert witness, Mr. Reid has successfully represented correctional services in several states and various jurisdictions over a wide range of legal matters.

In recognition for his dedicated work to improve Corrections, he has received numerous awards including the Colorado Criminal Justice Association's prestigious 2006 Harry Tinsley Award.

Theresa C. Lantz

Theresa C. Lantz is a consulting associate for the Criminal Justice Institute. Ms. Lantz has more than 37 years of experience dedicated to public safety, staff safety, offender accountability and the effective management of state agency resources. She was commissioner of the Connecticut Department of Correction from 2003 to 2009, where she directed an agency comprising 18 correctional facilities and 7,000 staff, who supervised 23,000 offenders. She had an operating budget of more than $700 million. She administered safe, secure and efficient operations of facilities and transitioned the agency to a Re-Entry Model with proven recidivism reduction, including partnering with other state agencies, law enforcement, local communities and non-profit providers to address issues related to offenders returning to communities. Under her leadership, the Connecticut Department of Correction experienced a reduction in staff assaults and an enhancement in offender safety. Ms. Lantz also served Connecticut as a deputy commissioner, warden of three high security facilities, and director of training and staff development. Before her 20 years at the Department, she worked as a correctional program specialist for the U.S. Department of Justice National Institute of Corrections; and training development specialist, correctional treatment specialist and senior correctional officer for the District of Columbia Department of Corrections.

Since her retirement, Ms. Lantz has been a consultant, trainer and assessment/auditor working with multiple organizations and state correctional systems, including the Criminal Justice Institute, Inc., the Department of Justice National Institute of Corrections (Prison Staffing Analysis program presenter); Homeland Security/ICE (National Detention Standards auditor), safety and security audits in numerous states (PREA and staffing focused), and a corrections expert witness for Washington, North Carolina and the U.S. Department of Justice. As a member of the Association of State Correctional Administrators, she served as the chair of the Programs and Training Committee.

Appendix D: Correctional Leading Practices

As described in the body of the report, our experts from the Criminal Justice Institute used their professional experience and expertise in the corrections field to develop a list of industry standards and practices they believed were most relevant to the safety of staff working in prisons. They then compared Department and facility policies, procedures and practices to the identified leading practices they compiled to identify opportunities to further improve staff safety.

The specific source for each of the identified widely accepted practices is noted below:

1. ***ACA1*** – *American Correctional Association (ACA) Standards for Adult Correctional Institutions,* 4th Edition
2. ***NIC1*** – *U.S. Department of Justice's National Institute of Corrections, The Security Audit Program, A How-To Guide and Model Instrument for Adaptation to Local Standards, Policies, and Procedures,* September 2013
3. ***NIC2*** – *U.S. Department of Justice's National Institute of Corrections, Prison Staffing Analysis: A Training Manual, with Staffing Considerations for Special Populations,* December 2008
4. ***ACA2*** – *American Correctional Association (ACA), Standards for Correctional Training Academies,* First Edition, May 1993
5. ***ICE*** – *U.S. Immigration and Customs Enforcement Performance-Based National Detention Standards,* 2008
6. ***Expert Opinion*** – Opinions of subject matter experts from the Criminal Justice Institute

A complete list of the leading practices, which includes descriptions and specific sources for each, follows.

Staff Training

Description: *Staff training is critical to ensure staff understand how to manage safety systems and supervise offenders. They must be prepared to respond to various types of security threats and incidents, including defusing potential conflicts which could result in harm to staff and offenders.*

Practice	Source and Citation
Group 1: Staff training administration	
1. Training plans are developed, evaluated and updated based on a valid assessment that identifies current job related training needs.	***ACA2*** *– Standard 1-CTA-3A-03*
2. Written policy, procedure and practice provide for ongoing formal evaluation of all pre-service, in-service and specialized training programs conducted by the academy. A written report is prepared annually and includes input from operational units.	***ACA2*** *– Standard 1-CTA-3A-06*
3. Written policy, procedure and practice provide that all new full-time academy employees receive orientation training before undertaking their assignments.	***ACA2*** *– Standard 1-CTA-3A-09*
4. Written policy, procedures and practice provide standards for the development of lesson plans, and require that lesson plans be on file and followed for each class conducted.	***ACA2*** *– Standard 1-CTA-3A-14*
Group 2: Training and staff development requirements	
5. **Orientation:** Written policy, procedure and practice provide that all new full-time employees must complete a formalized 40-hour orientation program before undertaking their assignments. At a minimum, the orientation includes instruction in the following: the purpose, goals, policies and procedures for the facility/agency; security and contraband regulations; key control; appropriate conduct with offenders; responsibilities and rights of employees; universal precautions, occupational exposure; personal protective equipment; biohazardous waste disposal; and an overview of the correctional field.	***ACA1*** *– Section 4-4082*
6. **Correctional Officers:** Written policy, procedure and practice provide that all new correctional officers receive an added 120 hours of training during their first year of employment and an added 40 hours of training each subsequent year of employment. At minimum, this training covers the following areas: • Security procedures • Supervision of offenders • Signs of suicide risks • Suicide precautions • Use-of-force regulations and tactics • Report writing • Offender rules and regulations • Rights and responsibilities of offenders • Fire and emergency procedures • Safety procedures • Key control • Interpersonal relations • Social/cultural lifestyles of the offender population • Communication skills • First aid/CPR • Counseling techniques • Cultural diversity	***ACA1*** *– Section 4-4084*
7. **Administrative Staff:** Written policy, procedure and practice provide that all administrative and managerial staff receive 40 hours of training in addition to orientation training during their first year of employment and 40 hours of training each year thereafter, in areas relevant to their position.	***ACA1*** *– Section 4-4083*
8. **Specialist Employees, Support and Part-time Staff:** Written policy, procedure and practice provide that all support employees who have regular or daily contact with offenders receive 40 hours of training in addition to orientation training during their first year of employment and 40 hours of training each year thereafter. Clerical/support employees who have minimal contact with offenders receive 16 hours of training in addition to orientation training during their first year of employment and 16 hours of training each year thereafter. All part-time staff and contract personnel receive formal orientation appropriate to their assignments and additional training as needed.	***ACA1*** *– Section 4-4085, -86,-87,-88*

9.	**Specialized Training:** Written policy, procedure and practice provide that correctional officers assigned to an emergency unit have at least one year of experience as a correctional officer and 40 hours of specialized training before undertaking their assignment, and receive 40 hours annually, at least 16 of which are specifically related to the emergency unit assignment. All security and custody personnel are trained in approved methods of self-defense and the use of force as a last resort to control offenders. Written policy, procedure and practice provide that all personnel authorized to use firearms receive appropriate training before being assigned to a post involving the possible use of such weapons. Firearms training covers the use, safety, and care of firearms and the constraints on their use. All personnel authorized to use firearms must demonstrate competency in their use at least annually. All personnel authorized to use chemical agents receive thorough training in their use and in the treatment of individuals exposed to a chemical agent.	***ACA1** – Section 4-4089, -90, -91, -92*

Staffing

***Description:** Staffing levels must be sufficient to safely and securely implement the policies and procedures of the prison facility. Each position should have clear, written post orders to ensure employees understand their assigned duties.*

	Practice	Source and Citation
	Group 1: Policies and procedures	
1.	One person or unit, with considerable experience in correctional operations and hands-on responsibility in staff deployment, should be in charge of agency security staffing.	***NIC2** – Chapter 3*
2.	At each facility, the chief of security (or similar position) presides over security staff deployment.	***NIC2** – Chapter 3*
3.	The staffing requirements for all categories of personnel are determined on an ongoing basis to ensure that offenders have access to staff, programs and services.	***ACA1** – Section 4-4050 (Ref. 3-4050)*
4.	The institution uses a formula to determine the number of staff needed for essential positions. The formula considers, at a minimum, holidays, regular days off, annual leave and average sick leave.	***ACA1** – Section 4-4051 (Ref. 3-4051)*
5.	The warden/superintendent should document that the overall vacancy rate among staff positions authorized for working directly with offenders does not exceed 10 percent for any 18-month period.	***ACA1** – Section 4-4052 (Ref. 3-4052)*
	Group 2: Staff assignments	
6.	Correctional officer posts are located in or immediately adjacent to offender living areas to permit officers to hear and respond promptly to emergency situations.	***ACA1** – Section 4-4177 (Ref. 3-4170)*
7.	There are written orders for every correctional officer post. These orders are reviewed annually and updated if necessary.	***ACA1** – Section 4-4278 (Ref. 3-4171)*
8.	There is a sufficient number of supervisory staff assigned to each shift to provide supervision and direction to line staff.	***Expert Opinion***

Physical Environment

***Description:** The physical environment of the facility should be designed to minimize risk to staff. There should be written policies to guide construction and inspection of facilities, and staff training on the appropriate use and inspection of the facility.*

	Practice	Source and Citation
	Group 1: Policies, directives and post orders	
1.	There is written policy that requires systematic inspection of all equipment and areas of the institution, and there are procedures to ensure compliance with policy and documentation of inspection activities.	***NIC1** – Addendum Guideline C: Security Inspections, page 129*
2.	The institution conforms to applicable federal, state, and/or local fire safety codes. The authority having jurisdiction documents compliance. A fire alarm and automatic detection system are required, as approved by the authority having jurisdiction, or there is a plan for addressing these or other deficiencies within a reasonable time period. The authority approves any variances, exceptions, or equivalencies that do not constitute a serious life safety threat to the occupants or the facility.	***ACA1** – Section 4-4124*

Group 2: Physical plant — Practice and inspections		
3.	Staff assigned to conduct security inspections complete a written report of each area inspected, noting the weaknesses or deficiencies of each. Each security inspection report is reviewed by the institution security chief, and action is taken as appropriate to the needs identified. Inspection reports are maintained at least 30 days.	***NIC1** – Addendum Guideline C: Security Inspections, page 129*
4.	All control room doors and windows are inspected daily to ensure security.	***NIC1** – Addendum Guideline C: Security Inspections, page 130*
5.	The control room pass-through is not used as talk-through and is not routinely open.	***NIC1** – Addendum Guideline C: Security Inspections, page 130*
6.	A systematic approach is used to address security weaknesses and deficiencies that are identified by staff in inspection reports, and corrective actions are taken within a reasonable timeframe.	***NIC1** – Addendum Guideline C: Security Inspections, page 131*
7.	Facility areas with limited visibility have mirrors or cameras to compensate for lack of visibility. Cameras are to be recorded for review when necessary.	***Expert Opinion***
8.	All high security work areas have a primary and alternate evacuation route for staff and offenders in emergency conditions.	***NIC1** – Section 09.01.03*
9.	Security hardware (doors, window and door frames, glazing, locking devices and control systems) is appropriate to the institution's security designation and consistent with agency standards.	***NIC1** – Section 09.01.04*
10.	Control centers (ceiling, walls and floor) are constructed of re-bar reinforced concrete with at least 2-hour security glass.	***NIC1** – Section 09.01.05*
11.	Building materials and types, placement and installation of fixtures in cells, housing units, industries, kitchen, etc., are consistent with the institution's security designation and agency standards, and do not present health, safety or security problems.	***NIC1** – Section 09.01.06*
12.	Areas in which offenders work or reside do not have equipment or other objects stacked in work areas or wall dividers (temporary or permanent) that interfere with visual observation. The storage of goods and equipment is limited to that immediately necessary, and equipment and goods are securely stored against outside walls.	***NIC1** – Section 09.02.03*
13.	Security systems (i.e., emergency doors, duress alarms, communications (radios, duress alarms), and fire suppression systems) are tested on a regular basis, with documentation of testing outcomes.	***NIC1** – Section 09.02.07*
14.	Emergency generators provide 100 percent power backup to critical security systems (e.g., lighting, security door operations, gate operations) and instantaneous, 100 percent battery-based uninterrupted power supply (UPS) to critical security functions such as communications, alarm reporting and computer systems.	***NIC1** – Section 09.02.08*
15.	Emergency generators are located in a secure area and tested weekly. Startup and full load tests are conducted once each quarter. Maintenance activity and testing outcomes are documented. UPS power backup is tested at least monthly.	***NIC1** – Section 09.02.09*
16.	All administrative staff and supervisors have knowledge of which systems the emergency generator will operate in event of an emergency.	***NIC1** – Section 09.02.12*
17.	Any planned interruption of utility services, or stoppage of offender movement or program, is communicated to the chief of security no less than 48 hours before its occurrence.	***NIC1** – Section 09.03.03*
Group 3: Physical plant — Training		
18.	Facility maintenance staff have been properly trained and are capable of providing preventive maintenance and repairs to control panels and electronic equipment such as radios and FPS system. If facility maintenance staff are not available or are not properly trained, then a contract exists for contractors to make repairs in a timely manner.	***Expert Opinion***
19.	Staff are trained in the operation of new security equipment and technology, and their proficiency is tested on a random basis by supervisors.	***NIC1** – Section 09.02.06*

Offender Housing

Description: *Offender housing must be designed and operated in a way that limits risks to staff. Staff should be trained on how to manage and supervise offenders in their assigned housing units.*

Practice	Source and Citation
Group 1: Policies and procedures	
1. There should be written policy that governs the assignment of offenders to housing units and the operation of those housing units.	***Expert Opinion***
2. Housing unit post orders should be consistent with facility policy and reviewed/updated at least annually.	***Expert Opinion***
3. Written policy, procedure, and practice facilitate personal contact and interaction between staff and offenders.	***ACA1*** *– Section 4-4180 (Ref. 3-4173)*
4. Housing unit policies and procedures should clearly state staff expectations for managing and supervising offender housing. Staff should have clear understanding of their post responsibilities during each shift and should be effectively supervised.	***Expert Opinion***
Group 2: Environmental conditions	
5. Crowding in housing units makes effective supervision more difficult and can negatively impact housing unit operations while increasing the potential for incidents and violence to occur.	***Expert Opinion***
6. Areas where offenders work or reside do not have equipment or other objects stacked in work areas or wall dividers (temporary or permanent) that interfere with visual observation. The storage of goods and equipment is limited to that immediately necessary, and equipment and goods are securely stored against outside walls.	***NIC1*** *– Section 09.02.03*
7. Environmental conditions significantly influence the overall effectiveness of institutional operations. Standards for lighting, air quality, temperature and noise levels are designed to preserve the health and well-being of offenders and staff members, and to promote institutional order and security.	***Expert Opinion***
Group 3: Operations	
8. The facility has a communication system between the control center and offender living areas. A mechanical or audio communication system should be used to supplement direct staff supervision activities (for example, to advise staff of emergency needs), not as a substitute for staff supervision.	***ACA1*** *– Section 4-4176*
9. Access into housing unit control center is limited to those who are approved and have official business.	***Expert Opinion***
10. All electronic locking systems are physically checked a minimum of once each shift to ensure that they are secure when indicator lights on locking control panels indicate that they are on.	***NIC1*** *– Section 09.02.11*
11. Security checks of offenders and common areas in housing units should be conducted at least once every hour on a staggered basis. Documentation demonstrates that such checks occur.	***Expert Opinion***
12. Post orders require the search of all offender cells/rooms at least monthly.	***NIC1*** *– Section 10.02.01*
13. All cell/room searches are documented and logged in an official search log with notation of the search date, cell searched and contraband discovered.	***NIC1*** *– Section 10.02.02*
14. Each vacated cell is searched thoroughly before occupancy by another offender to remove contraband and document damage to the cell interior and furnishings. Preferably, the offender occupying the cell signs a form accepting responsibility for the cell with any noted deficiencies.	***NIC1*** *– Section 10.02.04*
15. There is written policy establishing limitations on the amount of property an offender may have in his/her possession, a listing of allowable items, and procedures for managing offender property.	***Expert Opinion***
Group 4: Special management	
16. Written policy establishes responsibility for the operation of segregated housing areas that may include disciplinary segregation, administrative confinement, protective custody and special program units.	***NIC1*** *– Section 11.01.01*
17. Written policy and procedure govern the selection criteria, supervision and rotation of staff who work directly with offenders in segregation on a regular and daily basis.	***ACA1*** *– Section 4-4259*
18. Written policy establishes a requirement that the security chief, assistant warden/superintendent, and warden/superintendent visit special housing units at least weekly. Sign-in logs document their visits on a regular basis.	***NIC1*** *– Section 11.01.03*

19.	Written policy clearly states criteria and procedures for placement and release from segregated housing areas, conditions of confinement and program components of the placement that pertain to eligibility for release, and review procedures.	***NIC1** – Section 11.01.02*
20.	The Department and facility should have a policy and current procedures that clearly explain staff expectations for managing and supervising special management offenders. Staff should have thorough understanding of their post assignments.	***Expert Opinion***
21.	Staff assigned to disciplinary or administrative segregation units are trained in the management of violent and disruptive offenders, cell extraction procedures and use-of-force policy.	***NIC1** – Section 11.02.01*
22.	Staff assigned to disciplinary or administrative segregation units are experienced in security and offender management. Probationary staff are prohibited from occupying a post in these units.	***NIC1** – Section 11.02.02*
23.	Staff assigned to special management units receive mental health training related to identifying offenders whose mental health status requires intervention by a mental health professional.	***Expert Opinion***
24.	Staff observation checks of offenders in segregated housing areas are conducted at least every 30 minutes. Documentation demonstrates that such checks occur.	***NIC1** – Section 11.03.02*
25.	A thorough cell search is conducted each time an offender is removed for a shower, exercise or other purposes to look for contraband and safety hazards.	***NIC1** – Section 11.03.03*
26.	Only one offender is allowed out of cell in an individual secure area at any one time, unless program or treatment plan calls for congregate activities that are approved by policy.	***NIC1** – Section 11.03.02*
27.	A ratio of two staff to one offender is required whenever an offender is removed from his/her cell in a segregated housing unit. Once a strip search has been conducted and the restraints applied and carefully checked, one officer may complete the escort while inside the secure segregation area.	***NIC1** – Section 11.03.06*
28.	Each offender is placed in handcuffs before the cell door is opened. Additionally, waist chains and leg restraints are required for any escort outside the secure segregation area.	***NIC1** – Section 11.03.07*
29.	Offenders are thoroughly strip searched before entering the special housing unit.	***NIC1** – Section 11.03.08*
30.	All items entering the special housing units are searched, including food carts, clothing for exchange, property, linen, and books and magazines.	***NIC1** – Section 11.03.09*
31.	Cell doors are controlled from a remote location and remain locked at all times except when the offender is exiting or entering the cell.	***NIC1** – Section 11.03.10*
32.	The segregated housing unit has a secure sally port entrance that is interlocked or for which each door is separately keyed.	***NIC1** – Section 11.05.01*
33.	The exercise areas for segregation offenders are searched and inspected prior to use. Special attention is paid to the condition of fence ties, metal braces and fence fabric integrity.	***NIC1** – Section 11.05.03*

Perimeter — Access and Egress

Description: *Perimeter access and egress provides the last major line of defense for control and security against contraband introduction, assault, escape and intrusion. This is accomplished through appropriate policies and procedures, effective staff training, necessary equipment and facility structures.*

Practice		Source and Citation
Group 1: Policies, operational memoranda and post orders		
1.	There is a policy on facility access and egress of persons entering a facility.	***Expert Opinion***
2.	There is a written policy or procedure governing the supervision of construction within and adjacent to the secure perimeter, including security clearance of construction workers, vehicle access, tool inventory and control, supplies and equipment, hours of work, and supervision of worker and vehicle or equipment movement.	***NIC1** – Section 08.02.15*
3.	Employees with inner-institution assignments and all visitors are processed through the main entrance of the institution.	***NIC1** – Section 08.05.01*

Group 2: Perimeter design and pedestrian/vehicle traffic flow		
4.	Pedestrians and vehicles enter and leave at designated points in the perimeter. Safety vestibules and sally ports constitute the only breaches in the perimeter of maximum security institutions.	***ACA1*** *– Section 4-4172*
5.	Perimeter tours are completed at least twice daily; before offenders have access to yard areas, and after offenders secure for evening to determine contraband control is maintained.	***Expert Opinion***
Group 3: Staffing and staff practice		
6.	Perimeter staffing is sufficient to prevent escape initiated from within the facility and external assault, including externally assisted escape and the introduction of contraband from outside the perimeter.	***NIC1*** *– Section 08.01.03*
7.	Perimeter lighting is connected to a reliable emergency power supply and tested at least monthly.	***NIC1*** *– Section 08.02.06*
8.	Items and equipment that may hide an offender or may be used to scale a fence or wall are secured and are a safe distance from the fence/wall.	***NIC1*** *– Section 08.02.17*
9.	A security supervisor makes an unannounced daily visit to each perimeter post at least once during the shift.	***NIC1*** *– Section 08.04.02*
10.	Perimeter staff are knowledgeable of appropriate actions when confronting suspicious persons or situations.	***NIC1*** *– Section 08.04.03*
11.	Perimeter staff are knowledgeable of appropriate actions in response to hostage situations.	***NIC1*** *– Section 08.04.07*
12.	Thirty (30) minute alertness notifications (security checks) are made by perimeter staff to the facility control room and are documented on the log designated for this purpose.	***NIC1*** *– Section 08.04.03*
13.	The identification of all persons entering and exiting the institution is determined and verified by staff assigned and trained to control access and egress.	***NIC1*** *– Section 08.05.02*
14.	All permanent staff present a picture identification card; occasional visitors and workers are provided temporary identification cards. Control staff visually verifies that the bearer of the card is the person authorized to enter/exit. Means used to determine the person is the same as the photo on identification card.	***NIC1*** *– Section 08.05.03*
15.	A log or electronic record of nonemployees who are permitted to enter the facility is maintained and reviewed by a control room supervisor at the beginning of each shift. Positive identification is made before entry to and exit from the facility are granted.	***NIC1*** *– Section 08.05.04*
16.	All purses, packages, toolboxes, or other containers are inspected before being allowed in the institution.	***NIC1*** *– Section 08.05.07*
17.	All vehicles, trailers, carts and equipment are thoroughly inspected before being allowed to enter or exit the institution.	***NIC1*** *– Section 08.06.01*

Security and Control: Control Center Communications

Description: *The control center keeps order in prison facilities by providing timely response to both routine situations and operations, and unanticipated incidents. It manages security systems, keys, communications, offender and staff movement, emergency supplies, security equipment, and access and egress through the secure perimeter of the facility.*

	Practice	Source and Citation
Group 1: Policy and procedures, operational memoranda and post orders		
1.	There are written policies, procedures and/or post orders limiting access to the control center(s) specifically to those persons with an official need to enter.	***NIC1*** *– Section 02.01.01*
2.	Written post orders detail control staff responsibility related to: • Communication with vehicles in transit, work crews and others • Management of emergencies including fire, disturbance, hostage situation, offender strike, escape, power failure or other emergencies • Communication device process and alarm response • Issuance of keys, emergency equipment and emergency supplies • Identification procedures related to facility entrance or exit	***NIC1*** *– Section 02.01.03*

3.	Written post orders include a comprehensive hostage situation statement, such as: "No person under duress retains authority to give orders or direction to any staff member" and "No offender will be released with hostages."	***NIC1** – Section 02.01.04*
4.	There is written policy that establishes responsibility for radio assignment for each person/post in the communications network, and for supervision and maintenance of communications equipment and operations.	***NIC1** – Section 02.02.01*
Group 2: Equipment and practice		
5.	The institution maintains an effective communications system that provides instant communication between the control center and offender living areas, security posts, all areas of the facility and mutual aid agencies.	***NIC1** – Section 02.02.02*
6.	Current, legible logs are maintained documenting the issuance and retrieval of emergency and restricted keys, weapons, restraint and control devices, chemical agents, and other emergency equipment and supplies per existing policy (observe/review).	***NIC1** – Section 02.02.04*
7.	Sound security practices are observed in the consistent, responsible use of interlock systems, sally ports, communications equipment, door-locking systems, security gates, and other points of entry and exit and communications within the facility for which the control center is responsible.	***NIC1** – Section 02.02.06*
8.	The control center is uncluttered and has sufficient storage space for all equipment. All equipment is properly stored to facilitate access and counting. Sightlines to gates, doors, and persons are clear and provide the ability to operate in a safe and secure manner.	***NIC1** – Section 02.02.09*
9.	All equipment is serviceable and functions properly, including video monitors, intercoms, fire alarms, electronic locking systems including indicator lights, and perimeter detection system alarm indicators.	***NIC1** – Section 02.02.10*
10.	There are an adequate number of portable radios, a battery recharge station and a system in place for repair/replacement of radio equipment. Radios are in good operating condition.	***NIC1** – Section 02.04.03*
11.	Each security post and area where staff are assigned has at least one means of direct communication with the control center.	***NIC1** – Section 02.04.06*
12.	All communications equipment, including duress alarms and emergency telephone systems, is tested on at least a daily basis from the post/area from which it will be used.	***NIC1** – Section 02.05.01*
13.	A system is used by the control center for communication with community work crews. Institution work crew supervisors routinely notify the control center of their general location.	***NIC1** – Section 02.05.02*
14.	If the institution has multiple units (e.g., annexes, work camps, outside warehouses), each unit has been assigned distinctive unit descriptions for staff who are assigned handheld radio units, and there are no repetitive 10-codes/signals or descriptions, or duplicate unit designations that could create confusion during emergency situations.	***NIC1** – Section 02.05.03*
15.	Security officers in non-stationary or non-visible positions routinely notify control center staff of their general location in the institution or off grounds.	***NIC1** – Section 02.05.04*
Group 3: Control center/communications — Staffing and training		
16.	Control center staff are conversant and have been trained in initial emergency response responsibilities, response to electronic alarms, initial staff notification and callback, and issuing of emergency equipment (test).	***NIC1** – Section 02.02.03*
17.	The control center staff have duties proportionate to managing secure and safe facility response and needs based on duties outlined in their post orders.	***Expert Opinion***

Security and Control: Offender Counts

Description: *Formal and informal counting of offenders provides accountability for the entire offender population, preventing escapes and ensuring a safe and secure working environment.*

Practice	Source and Citation
1. There is written policy that establishes procedure for the formal (scheduled), informal, and emergency counting of offenders, and for recounts in the event of a miscount.	***NIC1*** *– Section 04.01.01*
2. The institution has a system for physically counting offenders. The system includes strict accountability for offenders assigned to work and educational release, furloughs and other approved temporary absences.	***ACA1*** *– Section 4-4187 (Ref 3-4180)*
3. All institution staff are trained in offender count procedures and their responsibility relative to accounting for offender whereabouts. Staff are monitored to ensure that they are conducting frequent, informal counts of offenders under their control.	***NIC1*** *– Section 04.01.05*
4. There is at least one scheduled (formal) morning count conducted before offenders begin checking out of housing areas for scheduled activities.	***NIC1*** *– Section 04.02.02*
5. It is required that all offender movement cease from the time the count is announced until the count is cleared.	***NIC1*** *– Section 04.02.04*
6. Staff are required to count only living, breathing flesh.	***NIC1*** *– Section 04.02.06*
7. Staff conducting the count do not allow distractions while in the count process nor do they routinely perform any other duties during this time. Staff do not take phone calls during count. Offenders who distract staff during count activities are considered to have committed a major violation of institution rules and are subject to major sanctions.	***NIC1*** *– Section 04.02.07*
8. Offender participation in any portion of the count activity is prohibited, including preparation, processing, and delivery of count slips or handling of count-related documents.	***NIC1*** *– Section 04.02.08*
9. Security staff are required to provide up-to-date information to designated staff who are responsible for the master count concerning all housing moves, transfers, releases, and other activities that may impact the master count and accounting for offenders.	***NIC1*** *– Section 04.02.09*
10. All count slips, tabulations and master count sheets signed by staff conducting, tabulating and clearing the count are maintained on record for a minimum of 30 days.	***NIC1*** *– Section 04.02.09*

Security and Control: Hazardous Materials

Description: *The proper control of flammable, toxic and caustic materials enhances staff safety by reducing the likelihood that they are used as weapons against staff and offenders.*

Practice	Source and Citation
Group 1: Policies and procedures	
1. Written policy, procedure, and practice govern the control and use of all flammable, toxic and caustic materials.	***ACA1*** *– Section 4-4215 (Ref. 3-4203)*
2. Written policy requires compliance with all federal, state and local regulations governing the handling, management and disposal of hazardous materials.	***NIC1*** *– Section 03.01.01*
Group 2: Accountability, issuance and storage	
3. A perpetual inventory is maintained of all hazardous materials in each department within the facility. Inventories are maintained at the point of storage.	***NIC1*** *– Section 03.01.02*
4. Hazardous materials are drawn and issued only by an employee authorized by the warden/superintendent or higher authority.	***NIC1*** *– Section 03.02.01*
5. Offenders are issued chemicals, cleaning agents and caustics in the quantity required to accomplish an immediate task. Unused chemicals are not allowed in work areas at the end of the workday and are inventoried and secured before offenders leave the area.	***NIC1*** *– Section 03.02.02*
6. All canisters or dispensers containing hazardous materials issued to offenders or drawn by staff from a point of supply are labeled to identify the contents.	***NIC1*** *– Section 03.02.03*

7.	Use of all hazardous materials is consistent with the provisions and precautions listed in the Material Safety Data Sheet.	***NIC1** – Section 03.02.04*
8.	Material Safety Data Sheets are maintained and available for each hazardous substance wherever hazardous substances are stored/used.	***NIC1** – Section 03.02.05*
9.	All hazardous materials related to hobby craft items are inventoried and controlled by staff, and dispensed to offenders only on an as-needed basis and under supervision.	***NIC1** – Section 03.02.06*
10.	All flammable products are managed and controlled as hazardous materials, and are stored in the flammable materials locker in accordance with state and local fire codes.	***NIC1** – Section 03.02.07*
11.	Each department with the potential to handle hazardous materials has clearly labeled hazardous material storage containers in the area.	***NIC1** – Section 03.02.09*
12.	Disposal of hazardous chemicals is performed in a manner consistent with occupational health and safety codes. Offender involvement is not permitted in this activity or, alternatively, is allowed only under continuous direct staff supervision.	***NIC1** – Section 03.02.10*
13.	Sharps containers are strategically located in areas of use for the storage and/or disposal of sharps and contraband sharps requiring secure safe storage.	***NIC1** – Section 03.02.11*
Group 3: Training		
14.	All staff are trained in and understand safety/Material Safety Data Sheets and are trained in the handling, storage, inventory and disposal of hazardous materials.	***NIC1** – Section 03.02.08*

Security and Control: Searches and Contraband Control — Facility

Description: *When contraband – which includes drugs, weapons, cell phones and escape tools – is introduced into a facility, it poses a threat to the facility's orderly operation, and the safety of staff and offenders. Effective search and contraband control policies and procedures for buildings/areas, offenders, cells and visitors are necessary to minimize those threats.*

	Practice	Source and Citation
Group 1: Policies and procedures		
1.	Written policy, procedure and practice provide for searches of facilities and offenders to control contraband and provide for its disposition. These policies are made available to staff and offenders.	***ACA1** – Section 4-4192 (Ref. 3-4184)*
2.	Written policy establishes responsibility for a system of searches and procedures for the search of all areas of the institution, staff, visitors, offenders, vehicles, mail, offender property, warehouse goods, and other persons, areas and items that may pose a threat for introduction of contraband.	***NIC1** – Section 10.01.01*
3.	Post orders require the search of all offender cells/rooms at least monthly.	***NIC1** – Section 10.02.01*
4.	There is written policy establishing limitations on the amount of property an offender may have in his/her possession, a listing of allowable items and procedures for managing offender property.	***NIC1** – Section 10.10.01*
5.	Written policies and procedures govern the admission of offenders new to the system. These procedures include the following: thorough search of the individual and possessions.	***ACA1** – Section 4-4285 (Ref. 3-4272)*
Group 2: Practice		
6.	All security/custody staff have received training in the conducting of cell and area searches, frisk and strip searches, and authorized searches of visitors, guests and staff in a manner that ensures the detection of all contraband.	***NIC1** – Section 10.01.02*
7.	A routine, comprehensive uniformed staff search process is conducted upon entering a facility that consists of an electronic search (scan) of all items, containers, etc. brought into the facility by staff, and a requirement for all staff to successfully clear a body search, such as walk-through, handheld metal detector or scan, upon entering the facility. The effectiveness increases when the search process begins immediately upon entry.	***Expert Opinion***
8.	All cell/room searches are documented and logged in an official search log with notation of the search date, cell searched and contraband discovered.	***NIC1** – Section 10.02.02*
9.	All items that are not on the offender's property inventory or allowable property lists are confiscated during cell searches and before the transfer or release of the offender.	***NIC1** – Section 10.10.04*

10.	Each vacated cell is searched thoroughly before occupancy by another offender to remove contraband and document damage to the cell interior and furnishings. Preferably, the offender occupying the cell signs a form accepting responsibility for the cell with any noted deficiencies.	***NIC1*** *– Section 10.02.04*
11.	Searches of common areas are conducted on a regular, unannounced basis. Areas that are routinely searched include culinary, vocational, education, dayroom, recreation, visiting areas, industry shops and other areas to which offenders may have access.	***NIC1*** *– Section 10.03.01*
12.	Area searches are documented on an official search log. The log notes the search date, area searched and contraband discovered.	***NIC1*** *– Section 10.03.02*
13.	Frisk searches are systematic and thorough, and are consistent with training standards. All items on the offender's person are searched. Female offenders are searched in compliance with agency policy and Prison Rape Elimination Act (PREA) guidelines.	***NIC1*** *– Section 10.04.01*
14.	Random and routine frisk searches are conducted on offenders in all areas of the institution and off institution grounds.	***NIC1*** *– Section 10.04.02*
15.	Routine strip searches are conducted by an officer of the same sex as the offender in a place and manner that affords a degree of privacy. Emergency strip searches are conducted in an area that affords privacy if circumstances allow. Emergency strip searches are conducted by officers of the same sex unless no other reasonable/feasible alternative exists.	***NIC1*** *– Section 10.05.01*
16.	All purses, packages, toolboxes or other containers are inspected before being allowed into the institution.	***NIC1*** *– Section 08.05.07*
Group 3: Visiting searches and contraband control		
17.	Visitors and their belongings are searched thoroughly before being allowed to pass through the secure perimeter.	***NIC1*** *– Section 10.09.03*
18.	Any items allowed in the visiting room (e.g., diaper bags, purses and other containers) are carefully inspected by security staff before the visitor is allowed into the visiting room.	***NIC1*** *– Section 10.09.05*
19.	Each visitor is required to successfully pass through a metal detector; a handheld metal detector is used to search those who activate the alarm in the walk-through unit.	***NIC1*** *– Section 10.09.06*
20.	Visitors who repeatedly fail to clear the entrance inspection or refuse to submit to a search are denied the privilege of visiting.	***NIC1*** *– Section 10.09.07*
21.	The visitation area is close to the main entrance, has appropriate search and personal item storage areas for visitors, an adequate shakedown area for offenders, separate restrooms for offenders and visitors, and a children's play area.	***NIC1*** *– Section 10.09.08*
22.	At the completion of visitation, all offenders are thoroughly strip searched in an appropriate area designated for that purpose before being allowed to exit the visitation area.	***NIC1*** *– Section 10.09.10*
23.	At the conclusion of visitation, the visiting area is thoroughly searched, and trash disposal outside the facility is either directly supervised or performed by staff.	***NIC1*** *– Section 10.09.11*
Group 4: Mail searches		
24.	There are trained staff assigned responsibility for the daily management of offender mail.	***NIC1*** *– Section 10.08.02*
25.	Written policy, procedure and practice provide that offender mail, both incoming and outgoing, may be opened and inspected for contraband. Mail is read, censored or rejected based on legitimate institutional interest of order and security. Offenders are notified when incoming or outgoing letters are withheld in part or in full.	***ACA1*** *– Section 4-4491 (Ref. 3-4433)*
26.	There is written policy governing the handling of offender mail including mail and package receipt, inspection, and delivery; legal mail; authorization and documentation of the reading of mail (if required); receipt and handling of money; and the authorization, procedures, and documentation for denial of prohibited types of mail.	***NIC1*** *– Section 10.08.01*
27.	Incoming staff mail for distribution within the secure perimeter is inspected before distribution. Sensitive mail may be inspected in the presence of a representative of the department for which it is intended.	***NIC1*** *– Section 10.08.03*
28.	All mail is under staff control until it is distributed. Offender workers are not allowed in the mailroom.	***NIC1*** *– Section 10.08.05*

Group 5: Searches of vehicles entering and exiting the secure perimeter	
29. All vehicles, trailers, carts and equipment are thoroughly inspected before being allowed to enter or exit the institution.	***NIC1** – Section 08.06.01*
30. Trucks that are loaded or unloaded within the institution are kept under the supervision of an employee or escort officer. Loaded vehicles and others that cannot be fully searched are allowed to leave the facility only after the clearing of count.	***NIC1** – Section 08.06.02*
Group 6: Transportation searches	
31. The transporting officer in charge is present while a thorough search of each offender is conducted. Strip searches are thorough and are conducted consistent with policy.	***NIC1** – Section 05.03.08*
32. The transporting officer conducts a thorough safety check of the vehicle, searches its interior and ensures that it is fully fueled before offenders are brought to the vehicle.	***NIC1** – Section 05.03.09*
Group 7: Dry cell procedures	
33. When there is reasonable suspicion that a detainee may have ingested contraband or concealed contraband in a body cavity, and the methods of search specified above are inappropriate or likely to result in physical injury to the detainee, the facility administrator or designee may authorize the placement of the detainee in a room or cell to be closely observed by staff until the detainee has voided or passed the contraband, or until sufficient time has elapsed to preclude the possibility that the detainee is concealing contraband. Such placement is commonly referred to as "dry cell" status, which may be approved during regular duty hours by the facility administrator or designee, and at other times by the shift supervisor.	***ICE** – Part 2, Security Searches of Detainees, page 7, Close Observation in a "Dry Cell" No. 1 and No. 2.*
Group 8: Disposition of contraband	
34. A secure contraband locker in a secure area is designated for sensitive contraband storage during referral of a charge to disciplinary proceedings or an outside criminal court.	***NIC1** – Section 10.06.01*

Security and Control: Searches and Contraband Control — Staff

***Description:** To limit the introduction of contraband, it is also necessary to have effective contraband control policies and procedures, including searching staff.*

Practice	Source and Citation
1. A routine, comprehensive uniformed staff search process is conducted upon entering a facility that consists of an electronic search (scan) of all items, containers, etc. brought into the facility by staff, and a requirement for all staff to successfully clear a body search, such as walk-through, handheld metal detector or scan, upon entering the facility. The effectiveness increases when the search process begins immediately upon entry.	***Expert Opinion***

Safety and Emergency Procedures

***Description:** Adherence to safety and emergency policies and procedures reduces the opportunity for and likelihood of staff assaults, and makes it more likely emergencies will be successfully resolved. All staff must be aware of the plans, have sufficient equipment and be trained to execute the plans when needed.*

Practice	Source and Citation
Group 1: Policies and procedures	
1. There is a departmental/agency policy requiring detailed emergency plans for all institutions, and establishing a format and general requirements for inclusion in the institutional plans.	***NIC1** – Guideline B.1*
2. There are written plans that specify the procedures to be followed in situations that threaten institutional security. Such situations include but are not limited to riots, hunger strikes, disturbances and taking of hostages. These plans are made available to all applicable personnel, reviewed at least annually and updated as needed.	***ACA1** – Section 4-4224 (Ref. 3-4212)*

3.	There is a written evacuation plan to be used in the event of fire or major emergency. The plan is certified by an independent, outside inspector trained in the application of national fire safety codes and is reviewed annually, updated if necessary and reissued to the local fire jurisdiction. The plan includes the following: • Location of building/room floor plans • Use of exit signs and directional arrows for traffic flow • Location of publicly posted plan • At least quarterly drills in all locations, including administrative areas • Staff drills when evacuation of extremely dangerous offenders may not be included	***ACA1*** *– Section 4-4221 (Ref. 3-4209)*
4.	There are written procedures regarding escapes; these procedures are reviewed at least annually and updated if necessary.	***ACA1*** *– Section 4-4225 (Ref. 3-4213)*
5.	Institutional plans contain emergency post orders and responsibility checklists for staff assigned to each essential primary emergency response function.	***NIC1*** *– Guideline B.2*
Group 2: Physical plant and equipment		
6.	There is a staff member who is responsible for inspecting and maintaining emergency equipment and who ensures its availability in an emergency.	***Expert Opinion***
7.	The institution has the equipment necessary to maintain essential lights, power and communications in an emergency.	***ACA1*** *– Section 4-4216 (Ref. 3-4204)*
8.	Written policy, procedure and practice provide for a communications system within the institution and between the institution and community in the event of urgent, special, or unusual incidents, or emergency situations.	***ACA1*** *– Section 4-4217 (Ref. 3-4205)*
9.	During an emergency, as appropriate and indicated, all external communication systems (e.g., offender phone system) can be controlled and/or disabled from a secure location.	***NIC1*** *– Guideline B.3*
10.	In readiness for emergency, every uniformed staff person who has regular and direct contact with offenders is equipped with (on his/her person) items such as: chemical agent canister, body alarm, radio, keys, restraints, gloves and any other essential items.	***Expert Opinion***
11.	In situations where staff safety may be threatened, designated "safe havens" are specified in the plan and provisions are made to ensure that all staff are aware of the specific locations, both for their safety and to facilitate accounting for all staff.	***NIC1*** *– Guideline B.3*
12.	There is a designated command center in a highly secure location, preferably outside the secure perimeter, that is equipped with sufficient communications capability to manage an emergency situation, including telephones, computers and radios with talk around and mutual aid capability. Additionally, the center should contain detailed, current maps of the facility and surrounding area as well as blueprints of all aspects of the physical plant.	***NIC1*** *– Guideline B.4*
13.	There are designated areas in the facility where patrols require more than one officer to check to verify that no offender is present.	***Expert Opinion***
Group 3: Emergency training		
14.	All institution personnel are trained in the implementation of written emergency plans.	***ACA1*** *– Section 4-4220 (Ref. 3-4208)*
15.	All staff receives mandatory annual training on individual staff requirements and expectations during an emergency. This training is tailored to staff in various departments and areas.	***NIC1*** *– Guideline B.5*
16.	Emergency drills and simulations are conducted on a regular basis but no less than quarterly. These drills/simulations are in addition to the normally required fire evacuation drills. Examples of such drills include tabletop exercises for management and supervisors, actual escape simulations involving apprehension teams and local law enforcement, and alert calls for response teams to test availability and response times.	***NIC1*** *– Guideline B.6*
17.	The institution has an emergency response team capability of sufficient number for the institution's population, custody levels and mission. Team members are readily available, are competent with both lethal and non-lethal weapons and munitions, and train at least monthly in accordance with carefully designed lesson plans. External annual assessments of proficiency are required.	***NIC1*** *– Guideline B.7*

Key Control

Description: *Keys are essential to prison security and staff safety. Key control procedures provide the protection and security intended in the design of the locking systems.*

Practice	Source and Citation
Group 1: Policies and procedures	
1. Policies should: • Be comprehensive and clearly written • Be maintained in a secure area • Be available to staff for reference purposes • Be designated for restricted distribution • Prohibit the handling of security keys by offenders • Address the accountability, storage, issuance, loss, breakage, inventory and identification of facility keys • Address the issuance and storage of emergency keys	***ACA1*** *– Section 4-4195 (Ref. 3-4187)*
2. A locksmith or fully trained key control officer is assigned responsibility for key control and maintenance of locking devices.	***NIC1*** *– Section 07.01.02*
3. The post orders of officers who issue keys fully describe their responsibilities related to issuance and retrieval of keys/key rings and reporting loss, breakage or failure to return keys.	***NIC1*** *– Section 07.01.05*
Group 2: Accountability, issuance and storage	
4. A comprehensive audit of the key control program is conducted annually by knowledgeable staff from another institution or a central audit unit.	***NIC1*** *– Section 07.01.08*
5. A perpetual inventory and cross inventory of all keys, blanks, pattern keys and locks are maintained. Documentation is current and accurately reflects what is actually onsite.	***NIC1*** *– Section 07.02.03*
6. Keys, pattern keys, blanks, and locks are securely stored and inventoried using a systematic filing and storage method that ensures strict accountability.	***NIC1*** *– Section 07.02.04*
7. Key rings have been soldered or otherwise secured to prevent removal or loss of keys or identifying information.	***NIC1*** *– Section 07.02.07*
8. The permanent issuance of keys is controlled by institution procedure and is limited to non-security keys only for administrative areas, offices, file cabinets and other similar areas. A quarterly inventory is conducted of all permanent issue key rings.	***NIC1*** *– Section 07.02.11*
9. Keys are issued from a secure control center or similar reinforced area not accessible to offenders.	***NIC1*** *– Section 07.03.04*
10. All keys are returned to the issuing location at the end of the workday or when the employee to whom the keys were issued leaves the institution.	***NIC1*** *– Section 07.03.01*
11. A clearly marked keyboard or cabinet is used for key issuance, return and storage that assures ease of access, security and total accountability.	***NIC1*** *– Section 07.03.02*
12. All key sets have a tag indicating the key ring number and a tag indicating the number of keys on the ring.	***NIC1*** *– Section 07.03.05*
13. All key rings are accounted for at the beginning of each shift; all individual keys (key count) are accounted for once each 24-hour period.	***NIC1*** *– Section 07.03.06*
14. There is a system of key "chits" or an issue log for recording and documenting the issuance of keys.	***NIC1*** *– Section 07.03.07*
15. No keys are issued or maintained within the institution proper that will allow complete egress from the institution.	***NIC1*** *– Section 07.03.08*
16. No security key will be issued for routine use that has an access capability higher than a sub-master. No grand master keys will be issued.	***NIC1*** *– Section 07.03.09*
Group 3: Emergency keys and restricted keys	
17. Emergency key rings for various buildings and areas of the institution are stored in a readily accessible, secure control center.	***NIC1*** *– Section 07.04.01*
18. Emergency keys and locks are color coded for quick identification.	***NIC1*** *– Section 07.04.02*
19. Emergency key rings have a metal ring disc ("chit") stamped with the name of the area the ring accesses and the number of keys on the ring.	***NIC1*** *– Section 07.04.04*

20.	A duplicate emergency keyboard is maintained outside the secure perimeter such as in a tower or armory.	***NIC1** – Section 07.04.07*
21.	Emergency keys to the perimeter locks and gates are maintained outside the secure perimeter, and access is restricted by institution or department policy.	***NIC1** – Section 07.04.08*
22.	The issuance of emergency keys is restricted by policy and is clearly indicated on the emergency key board/cabinet to prevent access to sensitive areas by unauthorized staff.	***NIC1** – Section 07.04.10*
23.	Restricted keys are for those areas to which the warden/superintendent will limit access. Restricted keys are issued only to those individuals who provide proper identification and who have specifically been authorized in writing by the warden to have access to a specific restricted key(s).	***NIC1** – Section 07.05.01*
24.	A record of the issuance of restricted keys is maintained bearing the key ring number, date, time of issuance and return, the person to whom issued, the purpose of the issuance and the person authorizing the issuance.	***NIC1** – Section 07.05.02*

Tool Control

***Description:** Tools for facility maintenance or use in approved offender work programs can become weapons or escape tools. Effective control and accountability procedures for tools and other sensitive items that are stored within, or brought into, the facility for daily use are necessary to minimize risks.*

	Practice	Source and Citation
	Group 1: Policies and procedures	
1.	Written policy, procedure, and practice govern the control and use of tools, and culinary and medical equipment.	***ACA1** – Section 4-4196 (Ref. 3-4188)*
2.	A qualified security staff member has been designated as tool control officer.	***NIC1** – Section 12.01.02*
3.	The department head of each major department is designated as the area tool control officer.	***NIC1** – Section 12.01.03*
4.	All staff that routinely use tools have verified, by signature, that they have read the department/institution tool control policy and procedures and understand them.	***NIC1** – Section 12.01.04*
	Group 2: Accountability	
5.	Designated security staff conduct tool control audits of all areas not less than every six months.	***NIC1** – Section 12.01.07*
6.	Written reports documenting inspections and audits of tool control are submitted to the chief of security and the warden/superintendent.	***NIC1** – Section 12.01.08*
7.	A master perpetual inventory of all tools is maintained, and sub-inventories are maintained in shop areas where there are numerous tools.	***NIC1** – Section 12.03.01*
8.	Class A tools are used by offenders only under the direct supervision of staff.	***NIC1** – Section 12.01.09*
9.	When a Class A tool is missing, all offenders who had access to the tool are held at the worksite until a thorough search is conducted.	***NIC1** – Section 12.01.10*
10.	Tools are properly classified as Class A (hazardous) or Class B (nonhazardous).	***NIC1** – Section 12.02.01*
11.	All Class A tools are kept in a locked room or secure area when not in use.	***NIC1** – Section 12.02.03*
12.	Tools that can be marked without damage are etched with a code identifying the department and individual shop, and an individual tool number.	***NIC1** – Section 12.02.07*
13.	Shadow boards in secured areas of the institution are used for the storage and control of most tools.	***NIC1** – Section 12.02.10*
	Group 3: Issuance	
14.	When Class A tools are used by offenders, they are returned to the secure tool area by the authorizing staff.	***NIC1** – Section 12.04.03*
15.	When new tools are drawn for replacement, the old tool is turned in and safely disposed of in accordance with written policy.	***NIC1** – Section 12.04.04*
16.	A tool checkout is maintained for all tools issued, including those used in the shop areas.	***NIC1** – Section 12.04.05*

Group 4: Tools used in food services, medical sharps and syringes	
17. When not in use, knives, cooking implements and tools are securely stored in double-locked cabinets and shadow boarded for frequent, easy spot inventories.	***NIC1** – Section 12.05.01*
18. Knives used in the food service area should be securely cabled to the work area.	***NIC1** – Section 12.05.02*
19. A sharps log is fully and accurately completed on an ongoing basis.	***NIC1** – Section 12.06.02*
20. There is a perpetual inventory of all hypodermic needles. The number of needles present in the health services unit is restricted to the number needed for the shift. All hypodermic needles are stored in areas/cabinets of high security rating.	***NIC1** – Section 12.06.03*

Armory

Description: *Effective armory policies, procedures and practices ensure secure storage, handling and accountability of firearms, ammunition, chemical agents and security equipment; that only qualified employees are issued weapons and security equipment; and that offenders will not be able to gain access to them.*

Practice	Source and Citation
Group 1: Policies and procedures	
1. Written policy and procedure govern the availability, control and use of chemical agents, electrical disablers, and related security devices, and specify the level of authority required for their access and use. Chemical agents and electrical disablers are used only with the authorization of the warden/superintendent or designee.	***ACA1** – Section 4-4199 (Ref. 3-4191)*
2. Written policy, procedure and practice govern the inventory, issuance and accountability of routine and emergency distribution of security equipment.	***ACA1** – Section 4-4200 (Ref. 3-4192)*
3. There is written policy that establishes responsibility for operation and supervision of the armory/arsenal, and procedures for safe and secure management of armament and supplies.	***NIC1** – Section 01.01.01*
4. A staff member is designated by the warden/superintendent as the "armorer" and assigned responsibility for operation of the armory/arsenal.	***NIC1** – Section 01.01.03*
5. Written policy prohibits unauthorized persons from carrying weapons into the institution. Provision is made to store law enforcement officers' weapons and ammunition before entering the institution.	***NIC1** – Section 01.03.05*
6. There is department policy requiring standardization of armory equipment in all institutions with a specific listing of all such equipment either included or referenced to another document approved by the appropriate agency authority.	***NIC1** – Section 01.02.02*
Group 2: Inventory	
7. Firearms, chemical agents and related security equipment are inventoried at least monthly to determine their condition and expiration dates.	***ACA1** – Section 4-4201 (Ref. 3-4193)*
8. There is a current master inventory of all firearms, munitions, chemicals and security equipment. Munitions are recorded by make, type, caliber and serial number. Firearms are recorded by serial number and brand name.	***NIC1** – Section 01.01.02*
9. Staff authorized to issue and receive weapons are certified (trained) in the use of those weapons. Current, written documentation of those certified is maintained in the armory and at all other weapon issue points.	***NIC1** – Section 01.01.04*
10. Written policy establishes the warden/superintendent as the approving authority for issuance of weapons and for the carrying of weapons into the institution.	***NIC1** – Section 01.01.05*
11. A written record in the form of a secure sequential log is maintained of the routine and emergency issue of any security equipment from the armory.	***NIC1** – Section 01.02.04*
12. The expiration date of chemical agents is etched or otherwise indelibly marked on the container upon receipt. There is consistent rotation of chemical agents.	***NIC1** – Section 01.02.07*
13. There are written logs/reports of inspections indicating that all firearms and defensive equipment are cleaned, test fired and functioning properly. All weapons are inspected at least semiannually, and unserviceable weapons are repaired or replaced when weapons are transferred to unserviceable.	***NIC1** – Section 01.02.08*
14. All weapons inventories, and storage and issue logs are current, legible and correctly filled out.	***NIC1** – Section 01.02.09*

Group 3: Armory physical plant	
15. An entrance logbook is maintained bearing the signature, date, time of entrance, time of exit and purpose of the entry of all persons entering the armory. Entrance should be by restricted keys or other secure access system.	***NIC1** – Section 01.02.03*
16. There is written policy that limits access to the armory to those persons with an official need to be there. Only those staff designated in writing by the warden or superintendent may enter unaccompanied.	***NIC1** – Section 01.01.02*
17. The armory should be located in a secure area that is totally inaccessible by offenders.	***Expert Opinion***
18. There shall be a device for staff to safely unload weapons in any area where staff are required to secure weapons prior to entering the institution.	***Expert Opinion***
19. In all areas where staff are required to secure weapons, there will be secure storage available (e.g., vehicle trap, law enforcement entrance areas, etc.).	***Expert Opinion***
20. All weapons stored in the armory shall be unloaded.	***Expert Opinion***

Offender Rules and Discipline

Description: *An orderly and disciplined facility is the basis of a safe and secure environment for both staff and offenders. Facilities must have rules of conduct, and sanctions and procedures for violations, that are defined in writing and communicated to all offenders and staff. Disciplinary actions must be carried out promptly and with respect for due process.*

Practice	Source and Citation
Group 1: Offender rules	
1. Written rules of offender conduct should clearly specify acts prohibited within the institution and the penalties that can be imposed for various degrees of violation. The written rules are reviewed annually and updated if necessary. The rules should prohibit only observed behavior that can be shown clearly to have a direct, adverse effect on an offender or on institutional order and security. Penalties should be proportionate to the importance of the rule and the severity of the violation.	***ACA1** – Section 4-4226 (Ref. 3-4214)*
2. There is a written set of disciplinary procedures governing offender rule violations. These are reviewed annually and updated if necessary.	***ACA1** – Section 4-4227 (Ref. 3-4215)*
3. A rulebook that contains all chargeable offenses, ranges of penalties and disciplinary procedures is given to each offender and staff member, and is translated into those languages spoken by a significant numbers of offenders. Rules and regulations governing offender conduct are of limited value unless the offender understands them. Signed acknowledgment of rulebook receipt is maintained in the offender's file. When literacy or language problem prevents an offender from understanding the rulebook, a staff member or translator assists the offender in understanding the rules. Posting the rulebook is unnecessary provided there is evidence each offender receives a copy of the rules.	***ACA1** – Section 4-4228 (Ref. 3-4216)*
4. All personnel who work with offenders receive sufficient training so that they are thoroughly familiar with the rules of offender conduct, the rationale for rules and the sanctions available. All institutional personnel who work with offenders in any way should receive continuous in-service training to prevent discrepancies among staff members and interpretation or implementation of rules of conduct.	***ACA1** – Section 4-4229 (Ref. 3-4217)*
Group 2: Policy, process and practice	
5. There are written guidelines for resolving minor offender infractions, which include a written statement of the rule violated, and a hearing and decision within seven days, excluding weekends and holidays, by a person not involved in the rule infractions; offenders may waive their appearance at the hearing.	***ACA1** – Section 4-4230 (Ref. 4-4218)*
6. Written policy, procedure and practice provide that when an offender allegedly commits an act covered by criminal law, the case is referred to appropriate court or law enforcement officials for consideration for prosecution. Corrections and court or law enforcement officials should agree on the categories of offenses that are to be referred to them in order to eliminate offenses that are minor or of no concern.	***ACA1** – Section 4-4231 (Ref. 3-4219)*
7. Written policy, procedure and practice provide that when rule violations require formal resolution, staff members prepare a disciplinary report and forward it to the designated supervisor.	***ACA1** – Section 4-4232 (Ref. 3-4220)*

8.	All relevant information should be recorded on a disciplinary report form and should be as specific and comprehensive as possible. Disciplinary reports prepared by staff members include but are not limited to the following information: • Specific rule(s) violated • A formal statement of the charge • Any unusual offender behavior • Any staff witnesses • Any physical evidence and its disposition • Any immediate action taken, including the use of force • Reporting staff member's signature, and date and time of report	***ACA1*** *– Section 4-4233 (Ref. 3-4221)*
9.	Written policy, procedure and practice specify that when an alleged violation is reported, an appropriate investigation begins within 24 hours of the report and is completed without unreasonable delay, unless there are exceptional circumstances for delaying the investigation. Investigations of alleged rule violation should commence as soon as possible after the incident is reported. The investigating officer should be a staff member but not the officer who reported the incident.	***ACA1*** *– Section 4-4234 (Ref. 3-4222)*
10.	Within the disciplinary procedures document, there is provision for pre-hearing detention of offenders who are charged with rule violations. Pre-hearing detention is the confinement of an offender in an individual cell until an investigation is completed or a hearing is scheduled. Such detention should not be punitive and should be used only when necessary to ensure the offender's safety or institution's security. The offender's prehearing status is reviewed by the warden/superintendent or designee within 72 hours, including weekends and holidays. Documentation should be provided as to the reason for detention, and no offenders should remain in pre-hearing detention longer than necessary.	***ACA1*** *– Section 4-4235 (Ref. 4-4223)*
11.	Written policy clearly states criteria and procedures for placement and release from segregated housing areas, conditions of confinement, program components of the placement that pertain to eligibility for release and review procedures.	***NIC1*** *– Section 11.01.02*
12.	Written policy, procedure and practice provide that an offender charged with the rule violation receives a written statement of the charge(s), including a description of the incident and specific rules violated. The offender is given the statement at the same time that the disciplinary report is filed with the disciplinary committee, but no less than 24 hours prior to the disciplinary hearing. The hearing may be held within 24 hours with the offender's written consent.	***ACA1*** *- Section 4-4236 (Ref. 3-4224)*
13.	Written policy, procedure and practice provide that an offender may waive the right to a hearing, provided that a waiver is documented and reviewed by the chief executive officer or designee.	***ACA1*** *– Section 4-4237 (Ref. 3-4225)*
14.	Written policy, procedure and practice provide that offenders charged with rule violations are scheduled for a hearing as soon as practicable, but no later than seven days, excluding weekends and holidays, after the alleged violation. Offenders are notified of the time and place of the hearing at least 24 hours before the hearing.	***ACA1*** *– Section 4-4238 (Ref. 3-4226)*
15.	Written policy, procedure and practice provide for postponement or continuance of the disciplinary hearing for a reasonable period and good cause.	***ACA1*** *– Section 4-4239 (Ref. 3-4227)*
16.	To ensure objectivity, hearings for rule violation should be conducted by persons who were not directly involved in the incident. Written policy, procedure and practice provide that the disciplinary hearings on rule violations are conducted by an impartial person or panel of persons. A record of the proceedings is made and maintained for at least six months.	***ACA1*** *– Section 4-4240 (Ref. 3-4228)*
17.	Written policy, procedure and practice provide that offenders charged with rule violations are present at the hearings unless they waive that right in writing or through their behavior. Offenders may be excluded during testimony of any offender whose testimony must be given in confidence; the reasons for the offender's absence or exclusion is documented.	***ACA1*** *– Section 4-4241 (Ref. 3-4229)*
18.	Written policy, procedure and practice provide that offenders have an opportunity to make a statement and present documentary evidence at the hearing, and can request witnesses on their behalf; the reasons for denying such a request are stated in writing.	***ACA1*** *– Section 4-4242 (Ref. 3-4230)*
19.	Written policy, procedure and practice provide that a staff member or agency representative assists offenders at disciplinary hearings, if requested. A representative is appointed when it is apparent that an offender is not capable of collecting and presenting evidence effectively on his or her own behalf.	***ACA1*** *– Section 4-4243 (Ref. 3-4231)*

20.	Written policy, procedure and practice provide that the disciplinary committee's decision is based solely on information obtained in the hearing process, including staff reports, the statements of the offender charged, and evidence derived from witnesses and documents.	***ACA1** – Section 4-4244 (Ref. 3-4232)*
21.	Written policy, procedure, and practice grant offenders the right to appeal decisions of the disciplinary committee to the warden/superintendent or designee. Offenders have up to 15 days of receipt of the decision to submit an appeal. The appeal is decided within 30 days of its receipt, and offender is promptly notified in writing of the results. The appeal process should consider three factors: whether there was substantial compliance with institutional standards and procedures in handling offender discipline; whether the disciplinary committee's decision was based on substantial evidence; and whether, under the circumstances, the sanction imposed was proportionate to the rule violation.	***ACA1** – Section 4-4248 (Ref. 3-4236)*
22.	The sanctions imposed for disciplinary infractions should be reasonably proportionate to the severity of the offenses committed.	***Expert Opinion***
23.	Staff should be consistently enforcing the rules on all shifts and in all locations within the institution.	***Expert Opinion***

Classification

***Description:** A proper classification system ensures that offenders are classified to the most appropriate level of custody and program, both on admission and upon review of their status to ensure the safety and well-being of the community, staff and offender.*

	Practice	Source and Citation
	Group 1: Policies and procedures	
1.	Written policy, procedure and practice provide for a written offender classification plan. The plan specifies the objectives of the classification system and methods for achieving them, and it provides a monitoring and evaluation mechanism to determine whether the objectives are being met. The plan is reviewed at least annually and updated as needed.	***ACA1** – Section 4-4295*
2.	The classification system specifies the level of custody required and provides for a regular review of each classification. A correctional system should provide at least three levels of custodial control. All offenders should be assigned to the least restrictive custody level necessary.	***ACA1** – Section 4-4296 (Ref. 3-4283)*
3.	The classification plan provides for maximum involvement of representatives of relevant institutional programs and the offender concerned in classification reviews. The classification process requires the cooperation and input of both the offender and the institution's program personnel. Offenders should participate in assessing their needs and selecting programs to meet those needs.	***ACA1** – Section 4-4297 (Ref. 3-4284)*

Offender Programs and Services

***Description:** Policies and procedures should provide adequate supervision, security and contraband control for offenders who are participating in offender programs, such as work, education, recreation, health services and religious activities. This includes limiting or restricting offender access to some programs and services to ensure the safety of staff, other offenders and the general public.*

	Practice	Source and Citation
	Group 1: Visiting	
1.	Written policy should provide for clear regulations concerning visitor approval, searches, time and length of visits, number of visitors allowed, personal property visitors may have including medications, visitor and offender dress, offender personal property allowed at the visit, physical contact between visitors and offenders, and other factors pertaining to the maintenance of a secure, comfortable and safe visiting environment. This is necessary to mitigate risk of escape, assaults, serious injury, or death of offenders, staff and visitors in all areas of the institution to ensure a safe and secured environment.	***NIC1** – Section 10.09.01*
2.	Staff are positioned to provide direct visual supervision of the entire visiting area throughout the visiting period.	***Expert Opinion***

Group 2: Offender work assignment, education, vocational, mail, recreational, food services, health services and religious services/programming	
3. Prior to accepting responsibility for the supervision of offender workers, all staff, including volunteers or other noncustodial staff and temporary staff, have received training in the supervision of offenders, personal safety and emergency response.	***Expert Opinion***
4. The staff-to-offender ratio should be commensurate with the location and size of the program area, the security level(s) of offenders participating and the type of activity to ensure that offenders are effectively supervised.	***Expert Opinion***
5. All staff, including volunteers and non-custody staff, should be issued personal alarms and a radio.	***Expert Opinion***
6. Custody staff make frequent rounds through the program areas.	***Expert Opinion***
7. Proper equipment should be available for staff use to conduct searches for contraband in the program and service areas.	***Expert Opinion***
8. Work and program staff should be trained in tool and equipment control, and there should be a process for managing the inventory and ensuring accountability.	***Expert Opinion***
9. Offender workers are routinely strip or frisk searched when departing their work area, or as the sensitivity of the assignment/area requires. This includes routinely strip searching outside offenders and/or frisk searching offenders, and clearing all offenders through a metal detector. The written policy clearly states the use of gender-specific searches, and any exception is clearly outlined in writing.	***NIC1*** *– Section 06.01.06*
10. The general location of all outside work crews is known by the institution central control at all times.	***NIC1*** *– Section 06.02.01*
11. Institution supervisory staff randomly "spot check" outside work crews, documenting each contact.	***NIC1*** *– Section 06.02.06*
12. All outside work crew officers or contractors have signed post orders or written instructions and guidelines.	***NIC1*** *– Section 06.02.07*
13. All recreational areas, including those used for restrictive housing, are searched for contraband prior to use. Special attention is given to the condition and integrity of the fence fabric, fence ties and the metal braces.	***Expert Opinion***
14. Offenders assigned to participate in work, education and vocational education programs are approved by a committee.	***Expert Opinion***

Offender Movement

Description: *Policies and procedures governing offender movement are necessary to ensure accountability of all offenders and the safety and security of staff, offenders and visitors. There is a high risk to staff and others if offender movement is not controlled in a methodical and consistent manner.*

Practice	Source and Citation
Group 1: Policy, operation memoranda and post orders	
1. Written policy, procedure and practice provide that staff regulates offender movement.	***ACA1*** *– Section 4-4188*
2. There are written policies/procedures that require control of offender movement sufficient to ascertain quickly and accurately the location of all assigned offenders at any time. This may be accomplished by several means, including a pass system, gate passes, ID card systems, biometrics or computer tracking systems.	***NIC1*** *– Section 05.01.01*
3. Written policy and procedure govern the transportation of offenders outside the institution and from one jurisdiction to another.	***ACA1*** *– Section 4-4189*
4. There is a current procedure or process in place to allow for movement based on level of custody or classification status.	***NIC1*** *– Section 05.02.03*
Group 2: Offender movement and transport practices	
5. All movement of individuals or groups of offenders is monitored, tracked and coordinated with security operations. Written procedures establish a system for monitoring, tracking and coordinating the mass movement of offenders (observe movement).	***NIC1*** *– Section 05.01.02*
6. Offenders do not have access to movement documents, including passes, tickets or the documentation pertaining to any such item.	***NIC1*** *– Section 05.01.04*

7.	All offender movement documents (passes) are legible, bear the authorized signature of a staff member and include the following information: • Offender name and assigned number • Department/area originating the pass • Name and signature of staff member originating the pass • Time and date of the pass • Destination • Time of arrival • Signature of receiving staff	***NIC1** – Section 05.01.04*
8.	There is an identification system for offenders assigned to work crews, preferably using laminated or embossed work crew cards, which includes the following: • Photo identification with name and number • Custody level If the offender is on an outside institution work crew, the following additional information is included: • Date of birth • Sentence information	***NIC1** – Section 05.01.05*
9.	All movement systems have a safeguard system to ensure offenders arrive at their destination. The system includes: • Communication by which staff are alerted that a specified offender is to be in the assigned area at a specified time • Predetermined timeframes within which movement must occur and beyond which the movement time is excessive • Written procedure specifying reporting actions to be taken if an offender does not arrive within the specified time • Written procedures specifying actions to be taken to determine an offender's whereabouts if the offender does not report to the assigned area	***NIC1** – Section 05.02.01*
10.	All high security transport officers are equipped with less lethal control devices, vests/ body armor and agency approved lethal weapons.	***NIC1** – Section 05.05.03*
11.	Each high security offender is restrained before leaving the institution by either: waist chain, handcuffs with handcuff cover, and leg-irons; or waist chain equipped with side cuffs and leg-irons.	***NIC1** – Section 05.05.01*
Group 3: Transport and movement training		
12.	All transport officers are trained on the use of restraints.	***Expert Opinion***
13.	There is a system for assigning only those staff trained in offender transportation, and in the use of firearms and restraints, to transportation duties.	***Expert Opinion***
14.	Staff must have read and understand their post orders in regards to offender movement.	***Expert Opinion***

Security Threat Group Management

Description: *The presence of violent prison security threat groups, or gangs, in a correctional facility poses a danger to both staff and offender safety. Because the activity level of gang members varies, it is important that information about them be gathered and analyzed continually. Effective programs include policies and procedures to identify and monitor potential threats and provide guidance on avoidance and de-escalation methods.*

Practice		*Source and Citation*
1.	There is a departmental policy for the management of prison Security Threat Groups, which is reviewed annually.	***Expert Opinion***
2.	The agency policy contains a definition for a Security Threat Group.	***Expert Opinion***
3.	The policy requires that an objective threat assessment be conducted to determine if a group may be classified/designated as a Security Threat Group.	***Expert Opinion***
4.	The policy establishes the criteria to be used to determine if individual offenders may be classified (validated) as members of a disruptive offender group.	***Expert Opinion***
5.	Documentation is maintained on all offenders identified as STG members.	***Expert Opinion***
6.	The Department/Institution monitors the behavior of Security Threat Groups and STG members.	***Expert Opinion***
7.	STG related intelligence information is gathered and shared with staff, other correctional facilities, and appropriate criminal justice agencies on a need to know basis.	***Expert Opinion***

8.	The policy establishes consequences for membership in a Security Threat Group.	***Expert Opinion***
9.	A process exists and is documented that provides STG members the opportunity to "drop out" (renounce gang membership).	***Expert Opinion***
10.	Inactive Security Threat Group members are monitored to ensure that they continue to remain free of gang related activities.	***Expert Opinion***
11.	There is a process to reactivate inactive STG members if it is determined that they have resumed active participation in STG activities.	***Expert Opinion***

Monitoring and Auditing

Description: *A complete monitoring and auditing program allows correctional agencies to determine the extent to which policy, procedure, standards and practice combine to provide a safe and secure facility. This is a critical management function that allows agencies to identify and correct problem areas, maintain established standards and promote continuous improvement.*

Practice		Source and Citation
1.	Written policy, procedure, and practice provide for a system to monitor operations and programs through inspections and reviews. This monitoring is conducted by the warden/superintendent or designated staff at least annually.	***ACA1*** *– Section 4-4017 (Ref. 3-4018)*
2.	Security audits focus on security operations. Although standards and policies are important aspects of such audits, the primary focus is the security systems and their operational implementation on a daily basis.	***Expert Opinion*** *based upon NIC1 Chapter 1, page 2, Types of Audits*
3.	Audit reports are shared with HQ and facility management, with established expectations for addressing deficiencies (such as a corrective action plan).	***Expert Opinion***
4.	Auditing methods allow for meaningful comparisons between facilities and from year to year.	***Expert Opinion***

Appendix E: Example of Staff Safety Survey

Cedar Creek Corrections Center - Staff Safety Survey

Cedar Creek Corrections Center - Staff Safety Survey

The State Auditor has selected us – /Criminal Justice Institute – as its independent subject matter experts to assess the Department's efforts to improve staff safety and security. For more information about the project, see the attached document - Washington State Auditor's Office- Performance Audit Description - Prison Safety and Security. At this stage of the project, we are preparing to visit your facility. In preparation for that visit we are interested in learning about your opinions, ideas, and suggestions concerning staff safety. To do so, we are asking that all facility staff complete this survey questionnaire. Your responses will be anonymous. Individual responses will not be reported. Only aggregated / grouped responses will be reported. Your answers to the survey questions will come directly to us at the Criminal Justice Institute via the Internet using a web-based tool called "Survey Monkey." When you finish answering the survey questions, just "hit" the "Done" button. It should take about 20 minutes to answer the questions, depending on how much information you wish to share. We ask that you submit your response by Friday, October 10. If you have any questions, you may contact either Tyler Benson or George Camp a
Thank you in advance for taking the time to respond. We very much value your opinions.

1. In your opinion, what has been the single most effective action taken to improve staff safety at your facility during the last three years?

2. In your opinion, what is the most needed improvement or action that your facility should engage in to achieve greater staff safety?

3. How many different staff safety improvement suggestion(s) have you submitted in writing to the facility Security Advisory Committee?

Page 1

Cedar Creek Corrections Center - Staff Safety Survey

4. If you have submitted one or more staff safety improvement suggestion(s), how many of those suggestions were: (Insert the number)

Adopted by the Facility	
Implemented by the Facility	
Not Adopted by the Facility Security Advisory Committee	
Referred to the Department Security Advisory Committee	
Adopted by the Department Security Advisory Committee	
Implemented by the Department	

5. How many staff safety initiatives have been implemented at your facility over the last three years?

One to two have been implemented	
Three to four have been implemented	
Five to eight have been implemented	
Eight to ten have been implemented	
More than ten have been implemented	
Don't know	

Cedar Creek Corrections Center - Staff Safety Survey

6. How many of those staff safety initiatives that were implemented, continue to be practiced/in place today?

One to two continue to be practiced	
Two to four continued to be practiced	
Five to eight continue to be practiced	
Eight to ten continued to be practiced	
More than ten continue to be practiced	
Don't know	

7. How effective has the facility Security Advisory Committee been in improving staff safety at the facility?

- ◯ Very ineffective
- ◯ Ineffective
- ◯ Neither
- ◯ Effective
- ◯ Very Effective

Comment:

8. During the time our Assessment Team is visiting your facility, to which areas of the facility should the Assessment Team pay particularly attention?

9. During the time our Assessment Team is visiting your facility, which policies and procedures should be closely examined to find out if they are being followed?

10. During the time our Assessment Team is visiting your facility, with whom should the team make it a point to talk about staff safety?

Cedar Creek Corrections Center - Staff Safety Survey

11. How adequate is the number of staff assigned to your facility?

- ◯ Extremely inadequate
- ◯ Very inadequate
- ◯ Adequate
- ◯ Very adequate
- ◯ Extremely adequate

Comment:

12. How adequate is the staff safety training provided at your facility?

- ◯ Extremely Inadequate
- ◯ Very Inadequate
- ◯ Adequate
- ◯ Very Adequate
- ◯ Extremely Adequate

Other (please specify)

13. Today, how safe do <u>you</u> think it is to work at your facility?

- ☐ Very Unsafe
- ☐ Unsafe
- ☐ Safe
- ☐ Pretty Safe
- ☐ Very Safe

Comment:

Cedar Creek Corrections Center - Staff Safety Survey

14. Today, how safe do you think other staff feel about working at your facility?

- ☐ Very Unsafe
- ☐ Unsafe
- ☐ Safe
- ☐ Pretty Safe
- ☐ Very Safe

Comment:

15. Relative to when you were working in the facility in 2011 (if in fact you were working at the facility in 2011) how safe is it now as compared to 2011?

- ○ Much less safe
- ○ Less safe
- ○ About the same
- ○ Safer
- ○ Much safer
- ○ N/A - not at the facility three years ago

16. How safe do you think the facility will be for staff three years from now as compared to how safe it is now?

- ○ Much less safe
- ○ Less safe
- ○ About the same
- ○ Safer
- ○ Much safer

17. In your opinion, how concerned is the Department about your safety?

- ○ Very unconcerned
- ○ Unconcerned
- ○ Not sure
- ○ Concerned
- ○ Very concerned

Comment:

Cedar Creek Corrections Center - Staff Safety Survey

18. In your opinion, how concerned is your facility's management about your safety?

- ◯ Very unconcerned
- ◯ Unconcerned
- ◯ Not sure
- ◯ Concerned
- ◯ Very concerned

Comment:

19. If you were Superintendent, what would you do to improve staff safety? (Please list up to three things you would do)

Staff Safety Improvement #1:

Staff Safety Improvement #2:

Staff Safety Improvement #3:

20. Please indicate your age group:

- ◯ Less than 21 years old
- ◯ 21 to less than 25 years old
- ◯ 25 to less than 30 years old
- ◯ 30 to less than 35 years old
- ◯ 35 to less than 40 years old
- ◯ 40 to less than 45 years old
- ◯ 45 to less than 50 years old
- ◯ 50 or more years old

21. Please indicate your gender:

- ◯ Male
- ◯ Female

Cedar Creek Corrections Center - Staff Safety Survey

22. Please indicate the number of years you have worked at the DOC:

- ◯ Less than 1 Year
- ◯ 1 year to less than 5 years
- ◯ 5 years to less than 10 years
- ◯ 10 years to less than 15 years
- ◯ 15 years to less than 20 years
- ◯ 20 years or more

23. Please indicate the number of years you have worked at this facility:

- ◯ Less than 1 year
- ◯ 1 year to less than 5 years
- ◯ 5 years to less than 10 years
- ◯ 10 years to less than 15 years
- ◯ 15 years to less than 20 years
- ◯ More than 20 years

24. Please provide the following information about your current position:

- ◯ Security (Uniform)
- ◯ Other than Security

25. On which shift do you normally work?

26. Please provide any information that you think would be good for us to be aware before visiting your facility.

Appendix F: Facility Profiles

This appendix contains a short profile of each of the 12 prisons, summarizing basic information about each prison, the key results from our survey and focus groups, and our experts' review of the implementation of the staff safety initiatives.

Basic information about each facility

The Department provided information about the custody levels at its facilities, offender population and violent infraction rates. The offender population numbers are for December 2014, which was around the time we conducted much of our fieldwork. The rate of violent infractions over time is the main measure the Department uses to determine the initiatives' effectiveness.

Safety concerns raised by experts

This section lists problems our experts noted when evaluating the implementation of the staff safety initiatives. The issues that occur statewide or are prevalent at most of the prisons are also described in the report.

Staff perceptions about safety

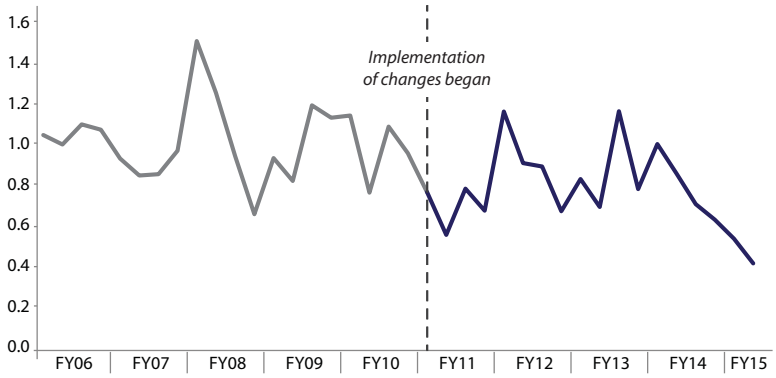
The information under "Survey results" came from our analysis of the survey data. For the first five items listed, we used "most" to describe where 75 percent or more of the respondents chose a certain answer. "More than half" indicated where 51 through 74 percent chose a particular answer. "Half" represented 50 percent of the respondents. "Less than half" was 49 through 25 percent. And "some" represented the remaining respondents. Below "Most effective actions" and "Most needed actions," we listed the three most cited responses to questions about the most effective action and the most needed improvement for staff safety.

In "Focus group highlights," we included the topics raised during focus groups about the safety initiatives the participants identified as useful and their ideas for possible future improvements.

Airway Heights Corrections Center

Custody levels: Medium, Minimum | **Offender population 12/2014:** 2,181

Violent infractions per 100 offenders



Safety concerns raised by experts

- **Radios:** There are not enough radios for non-custody staff.
- **Accountability checks:** Accountability checks are completed quickly for custody staff, but they take a long time for non-custody staff.
- **Security specialist:** They perform duties outside of their role and do not test duress alarms. They also had difficulty producing requested information related to safety initiatives.

Staff perceptions about safety

Survey results

Staff count: 539 Response rate: 32.3%

More than half feel safe (73%)

Less than half feel safer than in 2011 (40%)

Some feel they will be safer in three years (18%)

Less than half feel Department management is concerned about their safety (49%)

Less than half feel their facility's management is concerned about their safety (48%)

Most effective actions to improve safety:

- Improving accountability procedures
- Allowing staff to carry pepper spray
- Nothing

Most needed actions to improve safety:

- Hire more staff
- Increase the quality and quantity of radios
- Reintroduce shift musters

Focus group highlights

Several changes have been very helpful:

- Pepper spray
- Isolated-post checks
- Radio alarms and radio checks
- Training
- New cameras
- Cell ID numbers
- Place safety musters

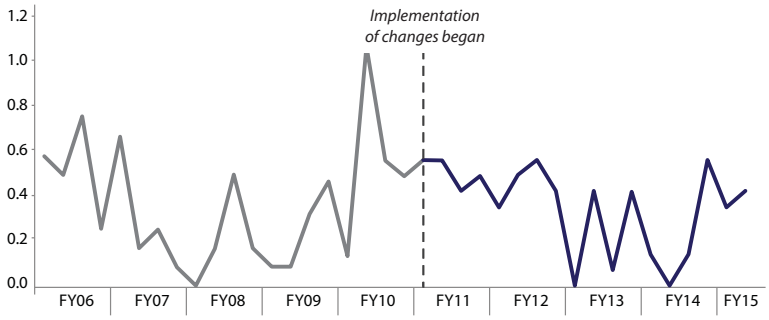
Staff want:

- Better feedback on safety suggestions
- Digital accountability measures
- Better facilitation and response to concerns raised in place safety musters
- More staff
- More defensive-tactics training
- Stricter hiring standards
- Staff searches

Cedar Creek Corrections Center

Custody levels: Minimum | Offender population 12/2014: 470

Violent infractions per 100 offenders



Safety concerns raised by experts

- **Sign-in/sign-out:** The system is prone to human error. Staff outside the perimeter may forget to sign out.
- **Local Security Advisory Committee:** The number of concerns submitted has declined. Staff report frustration with the slow response time to requests.
- **Place safety musters:** Staff expressed general dissatisfaction with meetings.
- **Accountability checks:** Accountability checks are completed quickly for custody staff, but they take a long time for non-custody staff.
- **Security specialist:** They perform duties outside of their role and do not test duress alarms.

Staff perceptions about safety

Survey results

Staff count: 130 Response rate: 26.9%

More than half feel safe (69%)

Less than half feel safer than in 2011 (46%)

Less than half feel they will be safer in three years (33%)

Less than half feel Department management is concerned about their safety (34%)

Less than half feel their facility's management is concerned about their safety (44%)

Most effective actions to improve safety:

- Hiring more staff
- Nothing
- Introducing place safety meetings

Most needed actions to improve safety:

- Hire more staff
- Install more or better cameras
- Nothing

Focus group highlights

Several changes have been very helpful:

- Pepper spray
- Improved accountability procedures, especially isolated-post checks and radio checks
- Place safety musters

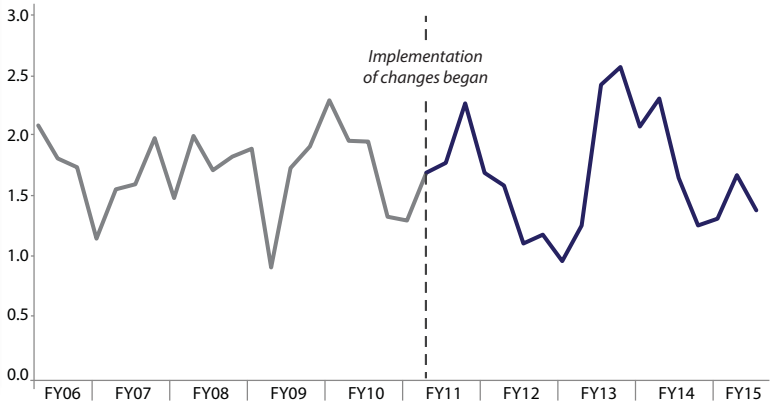
Staff want:

- More staff
- More training on physical force and tactical/verbal skills
- Staff searches
- Better lighting
- More cameras
- Better response to concerns raised in place safety musters

Clallam Bay Corrections Center

Custody levels: Maximum, Close, Medium | **Offender population 12/2014:** 885

Violent infractions per 100 offenders



Safety concerns raised by experts

- **Sign-in/sign-out:** The white board approach is prone to human error. Staff don't consistently sign in and out.
- **Cameras/mirrors:** There are no cameras or mirrors in housing areas.
- **Place safety musters:** Topics discussed at observed meetings are not always focused on security.
- **Accountability checks:** Accountability checks are completed quickly for custody staff, but they take a long time for non-custody staff.
- **Security specialist:** They perform duties outside of their role and do not test duress alarms.

Staff perceptions about safety

Survey results

Staff count: 376 Response rate: 23.7%

Most feel safe (77%)

More than half feel safer than in 2011 (61%)

Less than half feel they will be safer in three years (30%)

More than half feel Department management is concerned about their safety (60%)

More than half feel their facility's management is concerned about their safety (67%)

Most effective actions to improve safety:

- Improving accountability procedures
- Allowing staff to carry pepper spray
- Introducing place safety meetings

Most needed actions to improve safety:

- Hire more staff
- Install more or better cameras
- Increase communications

Focus group highlights

Several changes have been very helpful:

- Pepper spray
- Improved accountability practices, including isolated-post checks, alarm checks and two-to-open/two-to-close policy
- Physical plant improvements, such as a new turnstile and safety glass in the reception area
- Place safety musters

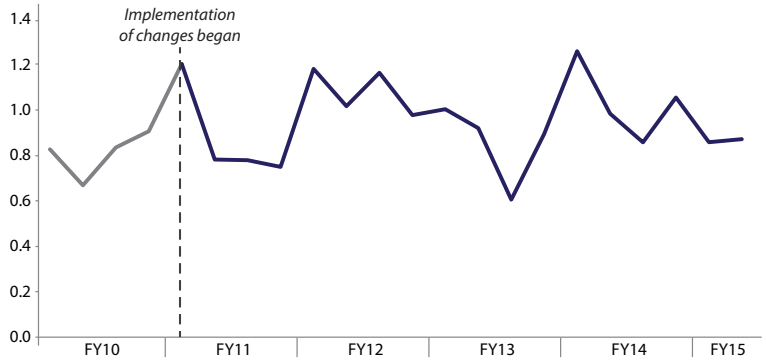
Staff want:

- Better communication from management
- More staff
- More training
- Staff searches
- Physical improvements to the facility
- Reduction in single-person posts
- More cameras
- Fewer classification overrides
- Better feedback about security suggestions and issues raised in place safety musters

Coyote Ridge Corrections Center

Custody levels: Medium, Minimum | **Offender population 12/2014:** 2,491

Violent infractions per 100 offenders



Safety concerns raised by experts

- **Sign-in/sign-out:** The system works at the perimeter level, but doesn't account for staff movement within the facility.
- **Isolated-post checks:** Sometimes relief officers forget to do routine checks because it is not their regular post.
- **Two-to-open/two-to-close:** Some staff were not aware of this requirement.
- **Radios:** Non-custody staff do not have radios; policy does not set standard for deployment.
- **Cameras/mirrors:** There are not enough cameras in the food factory.
- **Place safety musters:** Topics discussed at observed meetings are not always focused on security, and the meetings observed were sparsely attended.
- **Accountability checks:** Accountability checks are completed quickly for custody staff, but they take a long time for non-custody staff.
- **Security specialist:** They perform duties outside of their role and do not test duress alarms.

Staff perceptions about safety

Survey results

Staff count: 580 Response rate: 13.8%

Most feel safe (77%)

More than half feel safer than in 2011 (55%)

Less than half feel they will be safer in three years (39%)

More than half feel Department management is concerned about their safety (67%)

More than half feel their facility's management is concerned about their safety (53%)

Most effective actions to improve safety:

- Allowing staff to carry pepper spray
- Improving accountability procedures
- Performing routine status checks

Most needed actions to improve safety:

- Hire more staff
- Improve staff accountability procedures
- Hold more and better training

Focus group highlights

Several changes have been very helpful:

- Pepper spray
- More radios
- Accountability improvements, especially isolated-post checks and two-to-open/two-to-close policy
- Radio alarms and radio checks
- Training
- Tower alarm
- Place safety musters

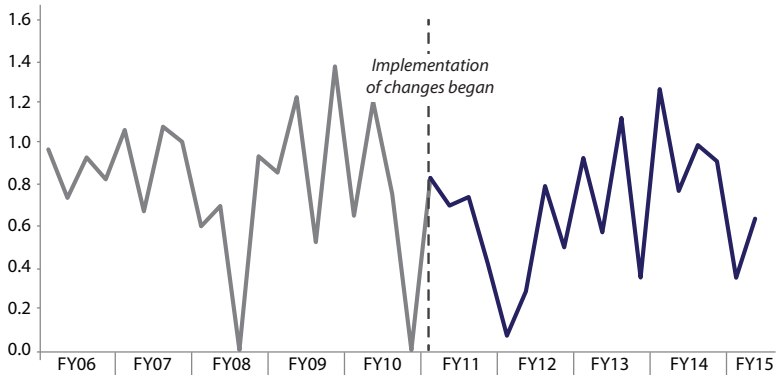
Staff want:

- Better communication and feedback
- Digital accountability measures
- More staff
- Staff searches
- More mirrors and cameras
- Fewer classification overrides
- Physical improvements to facility
- Better facilitation of place safety musters

Larch Corrections Center

Custody levels: Minimum | Offender population 12/2014: 471

Violent infractions per 100 offenders



Safety concerns raised by experts

- **Cameras/mirrors:** There are too few cameras, and many of those already in place are not connected properly.
- **Local Security Advisory Committee:** Management does not encourage dialogue.
- **Place safety musters:** Management does not encourage dialogue, and meetings were sparsely attended.
- **Accountability checks:** Accountability checks are completed quickly for custody staff, but they take a long time for non-custody staff.
- **Security specialist:** They perform duties outside of their role and do not test duress alarms.

Staff perceptions about safety

Survey results

Staff count: 122 Response rate: 32.0%

More than half feel safe (54%)

Less than half feel safer than in 2011 (43%)

Some feel they will be safer in three years (18%)

Less than half feel Department management is concerned about their safety (42%)

Less than half feel their facility's management is concerned about their safety (49%)

Most effective actions to improve safety:

- Increasing the quality and quantity of radios
- Hiring more staff
- Implementing place safety meetings

Most needed actions to improve safety:

- Hire more staff
- Install more and better cameras
- Have management listen to staff and respond to safety concerns

Focus group highlights

Several changes have been very helpful:

- Pepper spray
- Panic button and mic on radios
- Accountability improvements, especially routine status checks and sign-in/sign-out policy
- Controlled movement in camps
- Annual defensive-tactics training
- Place safety musters

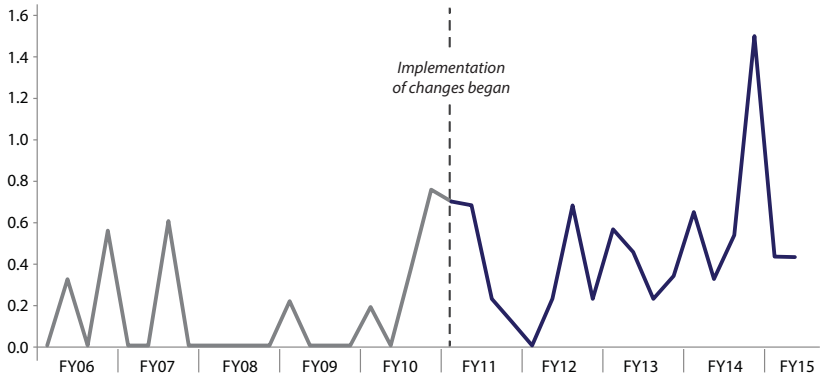
Staff want:

- More staff
- Updated staff accountability policies with specific practices
- More training
- Better response to concerns raised in place safety musters

Mission Creek Corrections Center for Women

Custody levels: Minimum | Offender population 12/2014: 315

Violent infractions per 100 offenders



Safety concerns raised by experts

- **Sign-in/sign-out:** The system works at the perimeter level, but doesn't account for staff movement within the facility.
- **Two-to-open/two-to-close:** This procedure is not always followed.
- **Place safety musters:** Participation at the observed meeting was low, and no security staff attended.
- **Accountability checks:** Accountability checks are completed quickly for custody staff, but they take a long time for non-custody staff.
- **Security specialist:** They perform duties outside of their role and do not test duress alarms.

Staff perceptions about safety

Survey results

Staff count: 102 Response rate: 16.7%

Most feel safe (82%)

Most feel safer than in 2011 (78%)

More than half feel they will be safer in three years (65%)

More than half feel Department management is concerned about their safety (70%)

More than half feel their facility's management is concerned about their safety (70%)

Most effective actions to improve safety:

- Improving accountability procedures
- Changing leadership
- Performing routine status checks

Most needed actions to improve safety:

- Hire more staff
- Improve staff accountability procedures

Focus group highlights

Several changes have been very helpful:

- Pepper spray
- Routine status checks
- Better communication with superintendent
- Place safety musters

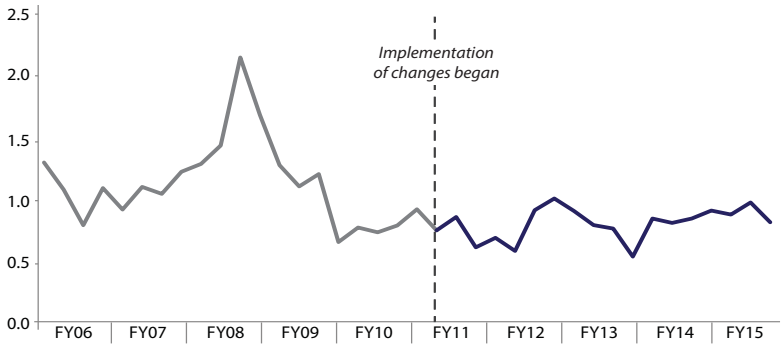
Staff want:

- More staff
- More cameras
- Better LSAC response to safety concerns
- Perimeter checks in pairs at night
- Place safety musters that include staff from different departments

Monroe Correctional Complex

Custody levels: Maximum, Close, Medium, Minimum | **Offender population 12/2014:** 2,438

Violent infractions per 100 offenders



Safety concerns raised by experts

- **Sign-in/sign-out:** Units within the complex use different sign-in/sign-out systems and operate independently. Some do not account for staff movement within the unit.
- **Cameras/mirrors:** Cameras are needed in some critical areas.
- **Pepper spray:** There is no inventory nor check-in procedures.
- **Accountability checks:** Accountability checks are completed quickly for custody staff, but they take a long time for non-custody staff.
- **Security specialist:** They perform duties outside of their role and do not test duress alarms.

Staff perceptions about safety

Survey results

Staff count: 1,046 Response rate: 25.4%

More than half feel safe (56%)

Less than half feel safer than in 2011 (36%)

Some feel they will be safer in three years (15%)

Less than half feel Department management is concerned about their safety (36%)

Less than half feel their facility's management is concerned about their safety (41%)

Most effective actions to improve safety:

- Nothing
- Improving accountability procedures
- Increasing staff awareness

Most needed actions to improve safety:

- Hire more staff
- Eliminate single-person posts
- Have management listen to staff and respond to safety concerns

Focus group highlights

Several changes have been very helpful:

- Pepper spray
- Routine status checks
- Two-to-open/two-to-close policy
- Place safety musters

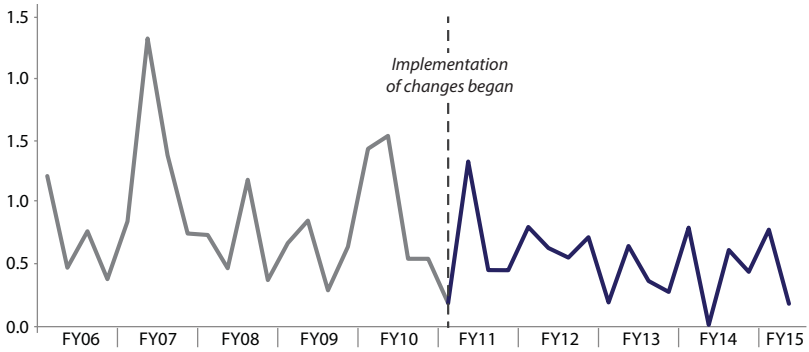
Staff want:

- More staff
- Better communication between shifts, and between staff and management
- More mirrors and cameras for better visibility
- More authority for sergeants
- Proximity cards for accountability
- Better enforcement of offender disciplinary actions
- Better search procedures
- Improved offender classification
- Better selection and presentation of topics in place safety musters to make them more responsive to staff needs

Olympic Corrections Center

Custody levels: Minimum | Offender population 12/2014: 388

Violent infractions per 100 offenders



Safety concerns raised by experts

- **Isolated-post checks:** Rather than isolated posts, officers are currently checking on all staff in all buildings. This removes the officers from their posts for an extended period of time and leaves only one officer in the unit to supervise offenders.
- **Cameras/mirrors:** Additional cameras are needed to address blind spots throughout the facility.
- **Local Security Advisory Committee:** The topics in the observed LSAC meeting were not based on local security concerns, but dealt with issues from the statewide Security Advisory Committee.
- **Accountability checks:** Accountability checks are completed quickly for custody staff, but they take a long time for non-custody staff.
- **Security specialist:** They perform duties outside of their role and do not test duress alarms.

Staff perceptions about safety

Survey results

Staff count: 111 Response rate: 34.2%

Most feel safe (92%)

More than half feel safer than in 2011 (69%)

Less than half feel they will be safer in three years (30%)

More than half feel Department management is concerned about their safety (65%)

More than half feel their facility's management is concerned about their safety (71%)

Most effective actions to improve safety:

- Increasing the quality and quantity of radios
- Installing more or better cameras
- Performing routine status checks

Most needed actions to improve safety:

- Hire more staff
- Improve staff accountability procedures
- Eliminate single-person posts

Focus group highlights

Several changes have been very helpful:

- Pepper spray
- Better radios
- Routine status checks
- Two-to-open/two-to-close policy
- Place safety musters

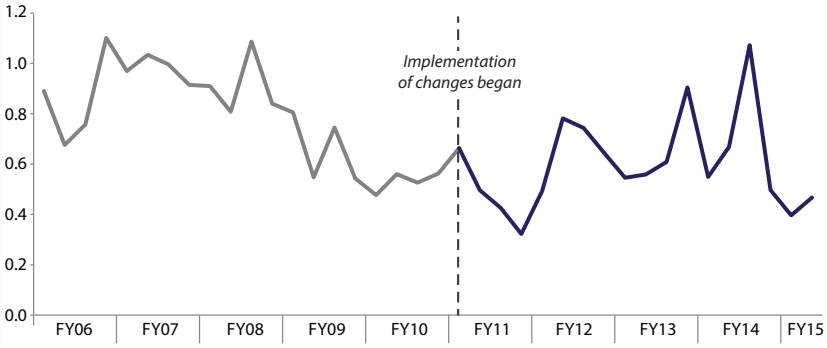
Staff want:

- A voice in decision-making
- More staff
- Better communication between shifts
- Less radio traffic
- Better response to issues raised in place safety musters

Stafford Creek Corrections Center

Custody levels: Maximum, Medium, Minimum | **Offender population 12/2014:** 1,972

Violent infractions per 100 offenders



Safety concerns raised by experts

- **Sign-in/sign-out:** There are different types of systems in different parts of the facility, which are inconsistent and prone to human error.
- **Isolated-post checks:** Not all posts are checked, and not all isolated posts are properly identified.
- **Local Security Advisory Committee:** Management does not encourage dialogue. The number of concerns submitted has declined.
- **Place safety musters:** Attendance is irregular, particularly for response and movement officers.
- **Accountability checks:** Accountability checks are completed quickly for custody staff, but they take a long time for non-custody staff.
- **Security specialist:** They perform duties outside of their role and do not test duress alarms.

Staff perceptions about safety

Survey results

Staff count: 459 Response rate: 14.8%

More than half feel safe (64%)

Less than half feel safer than in 2011 (38%)

Some feel they will be safer in three years (17%)

More than half feel Department management is concerned about their safety (51%)

More than half feel their facility's management is concerned about their safety (52%)

Most effective actions to improve safety:

- Improving accountability procedures
- Allowing staff to carry pepper spray
- Nothing

Most needed actions to improve safety:

- Hire more staff
- Install more or better cameras
- Increase staff awareness

Focus group highlights

Several changes have been very helpful:

- Pepper spray
- Better radios
- Two-to-open/two-to-close policy
- Place safety musters

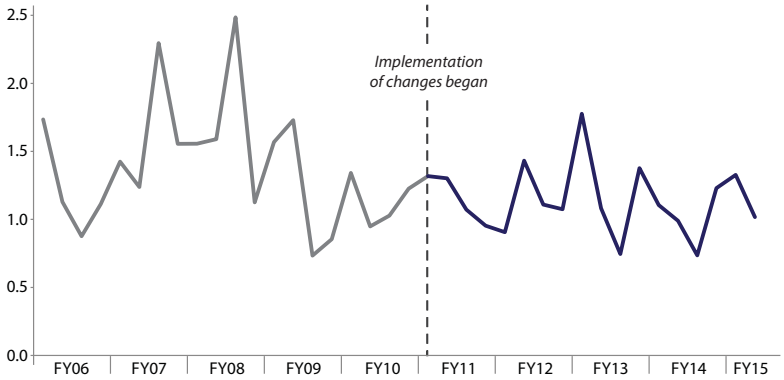
Staff want:

- Stricter hiring standards
- More training
- Clarified policies
- Better communication between staff and management
- Threat assessments for new offenders
- Tightened control of offender movement
- Proximity cards
- More cameras and radios
- Better facilitation at place safety musters

Washington Corrections Center

Custody levels: Maximum, Close, Medium | Offender population 12/2014: 1,667

Violent infractions per 100 offenders



Safety concerns raised by experts

- **Sign-in/sign-out:** The system is prone to human error.
- **Two-to-open/two-to-close:** This procedure is not always followed.
- **Cameras/mirrors:** Additional cameras are needed for blind spots in the warehouse and in vocational technologies.
- **Local Security Advisory Committee:** Attendance and participation has declined. Staff are confused about how to submit ideas and concerns.
- **Place safety musters:** Attendance has fallen. One of three meetings observed was poorly facilitated.
- **Accountability checks:** Accountability checks are completed quickly for custody staff, but they take a long time for non-custody staff.
- **Security specialist:** The position is too far removed from the superintendent in the chain of command. They perform duties outside of their role and do not test duress alarms.

Staff perceptions about safety

Survey results

Staff count: 542 Response rate: 16.6%

More than half feel safe (74%)

Less than half feel safer than in 2011 (46%)

Less than half feel they will be safer in three years (32%)

Less than half feel Department management is concerned about their safety (47%)

More than half feel their facility's management is concerned about their safety (58%)

Most effective actions to improve safety:

- Allowing staff to carry pepper spray
- Introducing place safety musters
- Improving accountability procedures

Most needed actions to improve safety:

- Hire more staff
- Improve staff accountability procedures
- Installing more or better cameras

Focus group highlights

Several changes have been very helpful:

- Pepper spray
- Training improvements
- Notification of new offenders with behavioral problems
- Visibility improvements
- Place safety musters

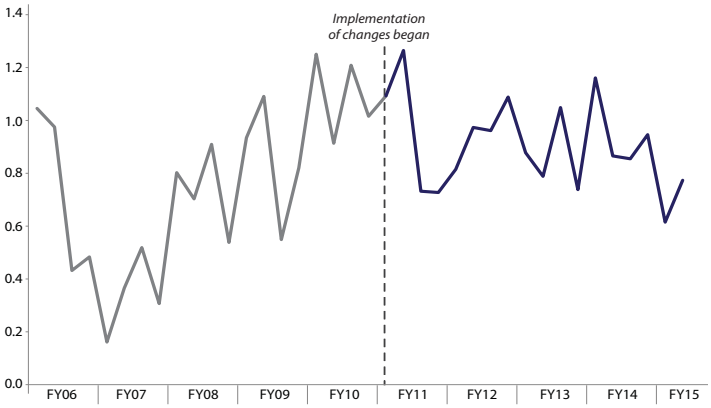
Staff want:

- Stricter hiring standards
- More training
- Better communication between shifts
- Better enforcement of offender disciplinary actions
- Broader use of pepper spray
- Better checks on remote posts
- Better handling of mentally ill offenders
- More cameras and mirrors for better visibility
- Better facilitation at place safety musters

Washington Corrections Center for Women

Custody levels: Close, Medium, Minimum | **Offender population 12/2014:** 874

Violent infractions per 100 offenders



Safety concerns raised by experts

- **Sign-in/sign-out:** The sign-in/sign-out board system is prone to human error.
- **Cameras/mirrors:** Additional cameras are needed in the minimum security units.
- **Job placement:** Three out of 15 (20 percent) job assignment documents reviewed were incomplete and unsigned.
- **Accountability checks:** Accountability checks are completed quickly for custody staff, but they take a long time for non-custody staff. Also, staff routinely do them in the morning shift, when it's easiest. Other shifts do not perform the drills.
- **Security specialist:** They perform duties outside of their role and do not test duress alarms.

Staff perceptions about safety

Survey results

Staff count: 362 Response rate: 16.0%

Most feel safe (79%)

More than half feel safer than in 2011 (67%)

Less than half feel they will be safer in three years (25%)

More than half feel Department management is concerned about their safety (60%)

More than half feel their facility's management is concerned about their safety (53%)

Most effective actions to improve safety:

- Performing routine status checks
- Introducing the two-to-open/two-to-close policy
- Allowing staff to carry pepper spray

Most needed actions to improve safety:

- Hire more staff
- Increase staff awareness
- Have management listen to staff and respond to safety concerns

Focus group highlights

Several changes have been very helpful:

- Pepper spray
- Routine status checks
- Training improvements
- Place safety musters

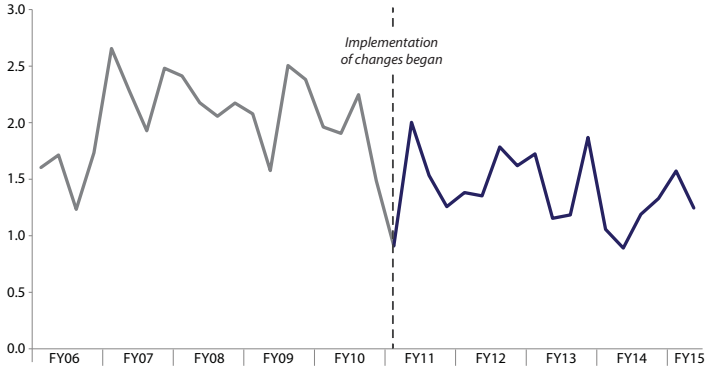
Staff want:

- Stricter hiring standards
- More training
- Better communication between management and staff
- Better search procedures
- Better perimeter security
- Better control of offender movement
- Better enforcement of offender disciplinary actions
- Improved handling of mentally ill offenders
- Better facilitation and response to concerns raised in place safety musters

Washington State Penitentiary

Custody levels: Maximum, Close, Medium, Minimum | **Offender population 12/2014:** 2,579

Violent infractions per 100 offenders



Safety concerns raised by experts

- **Sign-in/sign-out:** Proximity card system works well, but procedures and expectations regarding its use are unclear.
- **Two-to-open/two-to-close:** Some were not aware of this requirement. The facility's policy is unclear.
- **Cameras/mirrors:** Control of cameras is given to inappropriate staff (meaning those with other duties rather than the people who are already tasked with directly monitoring the areas being observed by camera).
- **Accountability checks:** Accountability checks are completed quickly for custody staff, but they take a long time for non-custody staff.
- **Security specialist:** They perform duties outside of their role and do not test duress alarms.

Staff perceptions about safety

Survey results

Staff count: 934 Response rate: 16.9%

More than half feel safe (65%)

Less than half feel safer than in 2011 (36%)

Some feel they will be safer in three years (16%)

Less than half feel Department management is concerned about their safety (36%)

More than half feel their facility's management is concerned about their safety (53%)

Most effective actions to improve safety:

- Allowing staff to carry pepper spray
- Improving accountability procedures
- Nothing

Most needed actions to improve safety:

- Hire more staff
- Reintroduce shift musters
- Hold more and better training

Focus group highlights

Several changes have been very helpful:

- Pepper spray
- Accountability improvements, especially two-to-open/two-to-close policy and routine status checks
- Training improvements
- Controlled movement
- Offender-classification improvements
- Place safety musters

Staff want:

- Better communication between shifts, and between staff and management
- Better search procedures
- Better gang-management strategies
- Stricter hiring standards
- More cameras and radios
- Broader use of pepper spray
- Better handling of mentally ill offenders
- Better facilitation at place safety musters