



December 2, 2010

Matthew L. Cate, Secretary  
California Department of Corrections and Rehabilitation  
1515 S Street, Room 502 South  
Sacramento, California 95814

Dear Mr. Cate:

This letter is to inform you of the concerns noted during our inspections of the five privately run out-of-state facilities that house California inmates. The facilities inspected were the Tallahatchie County Correctional Facility in Tutwiler, Mississippi; North Fork Correctional Facility in Sayre, Oklahoma; La Palma Correctional Center in Eloy, Arizona; Florence Correctional Center in Florence, Arizona; and Red Rock Correctional Center in Eloy, Arizona.

Our visits were part of the Office of the Inspector General's (OIG) facility inspection program whose purpose is to identify issues that, if left unaddressed, could develop into more significant problems. In addition to touring the five facilities and interviewing management, employees and inmates, we also reviewed certain terms and conditions of the out-of-state prison housing contract between the California Department of Corrections and Rehabilitation (CDCR) and the Corrections Corporation of America (CCA). Because OIG's inspection program is not as extensive as an audit, we performed only a limited review and testing of documents.


Many of our concerns relate to specific CCA facilities, but some of the issues appear to affect most, if not all, facilities. Most of these concerns were verbally discussed with both CCA and CDCR management representatives during our site visits. The concerns are detailed in the enclosed document and summarized below.

➤ ***Denial of Inmate Rights or Privileges***

These include retaining inmates in administrative segregation, overriding inmate classification scores, delaying transfer of inmate property, family visiting video-conferencing not provided, limiting programming opportunities for Northern and Southern Hispanic inmates, inmates lacking required classification committee documents, incorrectly recording inmate disagreements with committee decisions, and inadequately analyzing and documenting rule violation reports.

➤ ***Safety and Security Weaknesses***

These include missing or damaged inmate identification cards, allowing inmates to wear clothing similar to custody personnel, poor screening protocols for new CCA employees, inadequately preventing inmate workers' ability to tamper with food trays, unsupervised inmates in restricted areas, good security procedures not practiced during inmate movement

  
Arnold Schwarzenegger, Governor



and inmate counts, cell searches inadequately documented, significant incidents not investigated and improper evidence handling, opening under an inner fence-line security gate, employees not required to be quarterly weapons qualified or carry all safety equipment, inefficient alarm response system, inmates not provided with seat belts during transports, and inadequately training temporarily assigned transportation employees.

➤ ***Unenforced Rules, Policies, Practices or Contract Provisions***

OIG found that CDCR did not: exercise adequate oversight of the inmate welfare fund, competitively bid state-to-state transportation services, approve CCA's use-of-force policy and timely review use-of-force incidents.

➤ ***Other Notable Issues***

OIG also identified other issues that include conflicting inmate visiting protocols and other visiting program weaknesses, inmates being provided outdated institution rules, prescription medications being wasted, operating weaknesses in central control, poor formatting of inmate escape bulletins, inmate advisory committees lacking continuity and consistency, and insufficient safeguarding for inmate correspondence boxes.

CDCR should determine the impact of the identified issues at each of its out-of-state facilities, implement appropriate corrective action and monitoring, and report its comprehensive corrective action to the OIG by June 1, 2011. We will follow up on your corrective actions during future inspections. However, with regard to the denial of inmate rights and safety and security weaknesses, I strongly urge you to immediately address these issues and take all necessary corrective actions as quickly as possible.

Thank you for the courtesy extended to my employees during the inspections. If you have any questions regarding the above issues, please contact Jerry Twomey, Chief Assistant Inspector General, Bureau of Audits and Investigations, at (916) 830-3600.

Sincerely,



David R. Shaw  
Inspector General

Enclosure

cc: Scott Kernan, Undersecretary, Operations, CDCR  
Melissa Lea, Chief, Contract Beds, CDCR  
Lydia Romero, Chief (A), California Out-of-State Correctional Facility, CDCR  
Kim Holt, External Audits Manager, CDCR

## *Enclosure* - OIG Areas of Concern with CDCR Out-of-State Facilities

### *Denial of Inmate Rights or Privileges*

- Retaining inmates in administrative segregation
  - We identified four inmates at the Tallahatchie County Correctional Facility (Tallahatchie) who were held in the administrative segregation unit (ASU) longer than necessary. Even though the hearing officer had found the inmates not guilty of the offense that prompted their ASU placement, the California Department of Corrections and Rehabilitation's (CDCR) chief disciplinary officer did not promptly review the decision and forward the decision to the institutional classification committee that officially authorizes ASU releases. Instead, CDCR was not aware of the delay until the OIG brought the matter to its attention (approximately 20 days after the initial hearing officer's not guilty finding).
  - Based on inmate interviews and file reviews at Tallahatchie, North Fork Correctional Facility (North Fork), and Florence Correctional Center (Florence), inmates were not provided with staff assistance 24 hours prior to their classification hearings as required by California Code of Regulations Title 15, Sections 3315(d)(2)(B) and 3339(b)(3). For all three facilities, we reviewed a combined total of ten applicable case files and found no evidence that a staff assistant met with the inmate at least 24 hours prior to the hearing.
  - In two of five Tallahatchie institutional classification committee cases reviewed, ASU placement hearings were held 14 and 19 days after ASU placement in violation of California Code of Regulations, Title 15, Section 3338(a), which requires hearings be held within ten days.
  - The OIG observed that all out-of-state facilities house "level IV" inmates in ASU and deny those inmates general population privileges such as group exercise and programming opportunities that the inmates would likely get if they were housed in a level IV facility in California. According to the CDCR's chief of contract beds, all out-of-state placed inmates who violate rules and subsequently have their custody level point count increased to level IV status are placed in ASU until either re-classified as a level III override or transferred back to California. Normally, barring extenuating circumstances or unique case factors, an inmate who was on a general population yard prior to being placed in an ASU would be returned to a general population yard consistent with their point level once released from ASU. However, because none of the out-of-state facilities have level IV general population housing, the level IV inmates are retained in ASU.

After reviewing ASU placement logs, we found that all of the out-of-state facilities are retaining level IV inmates. Many of the inmates have been retained in ASU for long periods of time, some due to having level IV points and some due to being validated gang members. Active validated prison gang members are generally required by the California Code of Regulations Section 3341.5(c)(2)(A)(2.) to be placed in a security housing unit (SHU). Many of these ASU retained inmates are

pending transfers back to California facilities that have level IV yards or SHU. Specifically, we found that:

- North Fork housed 23 level IV inmates in ASU (some held between 19 and 24 months).
- Tallahatchie housed 13 level IV inmates in ASU (seven held between four and twelve months). In addition, we found another 37 validated prison gang members (or associates) held in ASU for five months.
- La Palma Correctional Center (La Palma) housed approximately 40 level IV inmates in ASU. Thirty of these inmates had been held from between six months to more than a year (most were pending transfers to California level IV or SHU facilities). Four of the inmates were validated prison gang members (or associates).
- Florence housed five level IV inmates in ASU (four held between five and ten months).
- Red Rock Correctional Center (Red Rock) housed three level IV inmates in ASU (one held over five months and pending transfer to a California SHU).

CDCR reported that it has tried to transfer the level IV inmates back to California; however, it has been unable to do so because California has limited level IV bed space. The OIG has concerns that CCA facilities do not meet California's standards for level IV housing, and CCA employees may not be adequately trained to manage level IV inmates or validated gang members.

➤ **Overriding Inmate Classification Scores**

- Even though the California Code of Regulations allows only level I through III inmates to be transferred out-of-state, CDCR is allowing inmates with level IV custody points to be retained as out-of-state level III inmates. This practice generally occurs when out-of-state level III inmates commit rule violations and their classification points are elevated to a level IV custody status. Further, CDCR management does not believe it always makes "fiscal or custodial" sense to transfer some inmates back to California. On March 17, 2010, CDCR issued a memorandum revising the out-of-state retention criteria. The memorandum allows, on a case by case basis, a level IV inmate with low points (52-59) to be classified as a level III override and retained out-of-state. A CDCR representative agreed that it was not unforeseeable that some inmates may deliberately commit rule violations to increase their custody points in an attempt to be transferred back to California. Although retaining these inmates in out-of-state facilities may have been a reasonable alternative to returning them to California, the OIG still has concerns that the intent of the California Code of Regulations Section 3379(a)(9)(A)(2) is not being met. Specifically, the code allows only level I through III inmates be transferred out-of-state, yet CDCR is allowing inmates with level IV points to be retained out-of-state. Further, CCA facilities do not meet the California Code of Regulation's level IV security requirements for internal armed coverage.

➤ Delaying Transfer of Inmate Property

- CCA or CDCR is not promptly transferring inmate property. At North Fork for example, OIG inspectors found that 46 inmates who arrived two to seven months earlier still did not have their property.

➤ Family Visiting Video-conferencing Not Provided

- Although CCA has contractually-required video conferencing equipment for inmate visiting, CDCR has no in-state facilities that offer video-conferencing service to visitors. CDCR management told us that while they have the necessary equipment at two different California locations, they have not been able to secure the funding for additional staff needed to monitor the visiting sites. Without video-conferencing, the cost of traveling to out-of-state facilities may effectively preclude family members from visiting.

➤ Limiting Programming Opportunities for Northern and Southern Hispanic Inmates

- As a result of a serious incident at Tallahatchie in March 2008, CDCR authorized CCA to move the Northern Hispanic inmates from Tallahatchie to La Palma. Because of the safety concerns due to gang conflicts with the more numerous Southern Hispanics, CDCR required CCA to house all Northern Hispanic inmates in the same La Palma housing unit. Since that time, CDCR and CCA have not provided a full complement of programming opportunities to the Northern Hispanic inmates at La Palma. At the time of our fieldwork, these inmates were offered exercise and GED education but have no access to a full law library, religious services, narcotics anonymous, alcoholics anonymous, and most paid jobs. In addition, CDCR management told us that 43 of 145 Northern Hispanic inmates housed at La Palma have a reading level at 6.0 or lower, yet none of these inmates are enrolled in adult basic education classes as required by CDCR's Operations Manual, Section 101010.1.
- In late October 2009, all general population Southern Hispanic inmates at four of the five out-of-state facilities were placed on lockdown status immediately following significant incidents that occurred within days of each other at the North Fork and Tallahatchie facilities. The North Fork incident included a serious staff assault and the Tallahatchie incidents included an attempted murder and large scale disturbance involving ninety-eight Southern Hispanic inmates. The resulting four-facility lockdown occurred from late October 2009 through mid-April 2010, during which time Southern Hispanics received virtually no programming or out-of-cell exercise. Between mid-April 2010 and early August 2010, the four affected facilities slowly returned their Southern Hispanic inmate population to normal programming.

In this particular case, the primary incident for which many of the Southern Hispanic inmates were locked down did not even occur at the facility in which the inmates were housed. While institutional safety and security may be an underlying factor that prohibits daily exercise on a short-term basis, at least some offering of

programs and exercise seems warranted during long lock-down periods. By flatly denying inmates exercise, CDCR creates a situation where the denial of programs and exercise could be viewed as punishment.

- Inmates Lacking Required Classification Committee Documents
  - CCA is not in compliance with requirements related to distribution of non-confidential inmate documentation. Unlike California facilities, none of the out-of-state facilities give inmates copies of their classification committee chronos (except those related to legal matters), even though the California Code of Regulations, section 3375(h), specifically requires that inmates be given a copy of all non-confidential documents.
  
- Incorrectly Recording Inmate Disagreements With Committee Decisions
  - Employees at Red Rock and Florence told the OIG that although classification chronos state that inmates concurred, inmates frequently did not agree with their institutional classification committee's decision. At Red Rock, we reviewed seven classification chronos (CDCR Form 128-G, the form used to document classification committee decisions) and found identically worded statements indicating the inmate agreed with the institutional classification committee's decision. At Florence, we also found three classification chronos that contained similar verbiage of inmate agreement, yet an employee told the OIG that one of the inmates did not agree with the institutional classification committee's decision.  
  
CDCR is responsible for recording information correctly on the CDCR Form 128-G, and CCA is responsible for allowing inmates to view the information upon request. However, as discussed above, because the CCA does not provide inmates with copies of CDCR Form 128-G (an apparent conflict with California regulations) inmates may not quickly identify and dispute inaccurate assertions made in their official files.
  
- Inadequately Analyzing and Documenting Rule Violation Reports
  - We reviewed 18 rule violation reports (CDCR Form 115) at the Tallahatchie, Florence, and Red Rock facilities and found that even after CDCR's chief disciplinary officer had reviewed and approved these reports, they still contained numerous discrepancies such as insufficient description of the incident, failure to consider evidence, and incorrect disposition.

### ***Safety and Security Weaknesses***

- Missing or Damaged Inmate Identification Cards
  - While shadowing custody officers at Red Rock during a housing unit standing count, we observed at least ten inmates who either had no identification card or a severely damaged identification card. Based on the officers' inquiries, most inmates

indicated they had no identification cards for some time. One inmate said he never had an identification card and another said a medical employee took the card and did not give it back.

- Allowing Inmates to Wear Clothing Similar to Custody Personnel
  - Both the La Palma and Red Rock facilities have inmates who wear clothing very similar to the color of an officer's uniform.
  
- Poor Screening Protocols for New CCA Employees
  - Red Rock performs limited job applicant background reviews. Specifically, Red Rock's hiring process does not include a comprehensive criminal background and arrest history review, such as a review of National Crime Information Center (NCIC) or California Law Enforcement Telecommunications System records. We also noted that Red Rock's background investigators only check arrest records for the city and county the applicant indicates as their current residence and do not review state arrest records. Although interviewed applicants are asked whether they personally know any California inmates, investigators do not attempt to corroborate the information by interviewing applicant's friends and family. Finally, the background process does not include asking the applicant whether they were ever sentenced to a California institution or visited a California inmate. During our inspection, the CDCR's chief of contract beds indicated that they recognize at least some shortcomings in CCA's background review process and future contract extensions will require NCIC checks to be performed.

At the Tallahatchie, North Fork, and La Palma facilities, the background hiring investigation process does not adequately attempt to identify whether an applicant has relatives or acquaintances housed in CCA or CDCR facilities. Further, La Palma does not attempt to determine whether an applicant ever visited an inmate.

- Inadequately Preventing Inmate Workers' Ability to Tamper with Food Trays
  - The Tallahatchie, North Fork, and La Palma facilities had security weaknesses that allow some inmate culinary workers who prepare dietary food trays to have access to administratively segregated inmates' names and housing locations. This potentially allows inmate culinary workers to pass contraband or tamper with other inmates' food.
  
- Unsupervised Inmates in Restricted Areas
  - During our site visits, we observed multiple instances where inmates were allowed unsupervised access to restricted areas. For example, at both Tallahatchie and Red Rock, we observed unsupervised inmates near or in the kitchen's restricted-access sugar and spice cage that employees had left unsecured. (Inmates can use sugar as an ingredient to make pruno, an alcoholic drink.) While in Florence, we observed an unsupervised inmate working in the culinary's dry goods storeroom, which had a restricted inmate access warning on the door entry, and we also observed another

unsupervised inmate working in the cold storage room where an unsecured cabinet contained jelly packs and syrup.

- At the Red Rock and La Palma facilities, we found the food manager's office door unsecured.
  - During our Florence inspection, we observed a blood-spill cabinet door damaged in the ASU entrance sallyport area. One of the officers who works in the area, speculated that inmate porters damaged the door while trying to gain unauthorized access.
- Good Security Procedures Not Practiced During Inmate Movements and Inmate Counts
- During a La Palma inmate movement, custody staffing levels were insufficient to adequately monitor inmates. Specifically, only one officer was stationed in a position to monitor and perform random clothed body searches of inmates exiting a housing unit. As a result, the officer was unable to fully focus his attention on the inmates passing through the metal detector, and we observed approximately 15 of 60 inmates move a barrier and go around the metal detector. We observed a similar situation at a second La Palma location.
  - We found that North Fork inmates working in the receiving and release clothing storage area had access to unsecured contraband items such as scissors.
  - Officers do not always follow good safety protocols when escorting inmates. We observed two instances where the same Red Rock custody officer employed poor safety practices. First, the officer allowed two inmate porters to follow behind him while escorting the porters up a flight of stairs. Later, we observed the same officer surrounded by approximately eight inmates he was escorting to a culinary work station. Correct safety practices dictate keeping all inmates in a direct sight line.
  - During a North Fork inmate count, a custody officer missed a count sheet resulting in an entire education classroom's 22 inmates not being counted. During the same count, a culinary officer returned two workers to their housing unit prior to the count clearing in violation of CDCR's Operations Manual, Section 52020.4 which prohibits most inmate movement during counts.
  - Due to limited exercise yard space at Red Rock, the residential drug abuse treatment program inmates are counted first and released to a remote exercise yard prior to the facility completing the full count.
- Cell Searches Inadequately Documented
- The Florence facility's ASU employees were not documenting searches done after an inmate vacates a cell and before an inmate occupies a cell. As a result, custody employees would be unable to hold a subsequent occupant accountable for contraband found in a cell.

In addition, custody officers could not easily determine when a cell was last searched because officers do not use a one page grid-style table that allows for a



quick summary of past cell searches. Without an adequate system in place, officers could omit searching some cells or repeatedly search the same cells.

- Similarly, the North Fork's ASU custody officers do not have an efficient way to track when searches of specific cells were conducted, who completed the search, or the result of the search. We also noted that cell searches conducted prior to housing newly-admitted ASU inmates are not recorded as required by the California Code of Regulations, Title 15, Section 3287(a).
- At all CCA facilities we found examples where cell searches were not recorded on both the ASU cell search log and the inmate's corresponding Daily Segregated Housing Record (CDCR Form 114-A).

➤ Significant Incidents Not Investigated and Improper Evidence Handling

- At Red Rock, staff could not locate investigative files for significant incidents occurring at the institution. From the facility's incident log for the period of January 23, 2010 through May 26, 2010, we found no evidence that any of the 31 incidents were ever investigated for possible wrong doing.
- At the same facility, OIG inspectors observed poor evidence handling that potentially could compromise evidence or render it unusable in judicial proceedings. For example, we observed a temporary evidence safe with evidence improperly labeled, evidence with no labels, evidence packaged improperly, and evidence with improperly completed chain of custody forms. Further, we found the safe had been over-packed and that some evidence had been held in the temporary safe for longer than 30 days. In a related area, inspectors were also unable to determine whether evidence was transferred to the local police department due to the incomplete chain of custody forms.
- OIG inspectors found an unauthorized employee had access to the La Palma facility's temporary evidence storage locker because a supply cabinet used the same key as the temporary evidence storage locker. As a result, evidence integrity could be compromised.
- The OIG reviewed CCA's evidence handling policies and found they do not explain how to process blood-soaked evidence.
- During our inspection, the Red Rock investigator's evidence safe was inaccessible for review. Specifically, the only person who knew the safe's code was on long-term sick leave and that individual could not remember the code when contacted by facility management. As a result, we could not assess Red Rock's evidence handling practices.
- A Tallahatchie housing unit search log review revealed that a "white powdered substance" was found during a January 2010 dorm inspection; however, the facility's investigative staff failed to follow through to determine the nature of the substance. The investigative evidence log showed no record of a white powdery substance being tested or retained as evidence.

- Opening Under an Inner Fence-Line Security Gate
  - At Tallahatchie, an inner fence-line inspection revealed an approximate ten inch gap below a gate in a restricted area that was large enough for a man to crawl through.
  
- Employees Not Required to be Quarterly Weapons Qualified or Carry All Safety Equipment
  - Regularly assigned armed transportation employees at Tallahatchie, North Fork, Florence, and Red Rock facilities only complete weapons qualification either annually or semi-annually, rather than quarterly like CDCR. As a result, CCA transportation staff may not be proficient with issued weapons.
  - At Tallahatchie and Red Rock, we observed officers unsafely carrying handcuffs looped over their belts rather than storing them in a handcuff case.
  - At Tallahatchie and Red Rock, several custody officers were observed not carrying a required CPR vent. At Tallahatchie, the CPR vents were never issued to some employees.
  - At La Palma, custody officers were not required to carry critical safety equipment such as whistles, pepper spray, and handcuffs.
  
- Inefficient Alarm Response System
  - Although not required by CDCR's Operations Manual, CCA facilities do not have an audible incident alarm system. Currently, custody staff relies on using an emergency button on their radios to notify central control that a problem has occurred. As a result, the emergency response may be significantly delayed because central control must then use radio communications to determine the officer's last known location.
  
- Inmates Not Provided with Seat Belts During Transports
  - None of CCA's medical transport vans are equipped with inmate passenger seat belts. According to the Insurance Institute for Highway Safety's website, the out-of-state facilities are all located in states where laws do not require adults in vehicle passenger rows to wear seat belts. While the out-of-state facilities may not be legally required to use seat belts, the OIG identified one occurrence where an unfastened inmate was injured during a medical transport.
  
- Inadequately Training Temporarily Assigned Transportation Employees
  - Tallahatchie and North Fork do not ensure that employees who transport inmates for unscheduled appointments receive the same training provided to regular transportation employees. For example, employees who regularly transport inmates to outside medical providers receive ongoing training to retain custody of inmates in public settings such as hospitals. Facility managers at both locations stated that if

regular transportation employees are not available, they instead select "fill-in" employees based on availability without considering their training.

### ***Unenforced Rules, Policies, Practices or Contract Provisions***

- Insufficient CDCR Oversight of the Inmate Welfare Fund
  - CDCR does not adequately oversee the Inmate Welfare Fund (IWF) to prevent potential contractor program abuse and assure that inmates are charged reasonable prices. The IWF is used by all CCA facilities to operate the inmate canteen where inmates can purchase personal necessities and for which profits are used to purchase equipment or services beneficial to the inmate population. While CDCR does monitor the use of IWF fund profits, it has never audited the CCA records to verify the accuracy of expenditures and revenues, including vendor rebates. In addition, CDCR was unable to demonstrate that CCA charges canteen prices that are comparable to California's prices.
  
- State-to-State Transportation Services Non-competitively Awarded
  - CDCR's non-competitively bid contract with CCA allows it to use a CCA subsidiary to provide routine state-to-state inmate transportation services. The contract though does not mandate the subsidiary's use. While the OIG recognizes that using a non-competitively bid transportation service may have been necessary in 2006, we are concerned that CDCR may be overpaying for state-to-state transportation services because it has not advertised or competitively bid for these services in the four years since the contract was awarded.
  
- Unapproved Use-of-Force Policy and Untimely Use-of-Force Incident Reviews
  - According to CDCR's chief of contract beds, CDCR has never approved CCA's use-of-force policy even though the contract terms require the policy's approval prior to inmate occupancy. Because CDCR has never approved CCA's use-of-force policy, CCA employees may not be trained in the same use-of-force standards as used in California prisons. To illustrate the importance of an approved use of force policy, CCA currently has no CDCR approved written policy on whether CCA's perimeter tower officers are authorized to use deadly force to quell inmate incidents.
  - At La Palma and Florence, use-of-force incident reviews were not being completed within 30 days and some were reviewed nearly three months after the incident.

### ***Other Notable Issues***

- Conflicting Inmate Visiting Protocols and Other Visiting Program Weaknesses
  - At the Florence facility, the visiting officer's post orders and the visitation policy contained conflicting directives regarding the amount of money a visitor may possess during visitations. The post orders indicated that visitors may have twenty

dollars cash while the visitation policy indicates only ten dollars. Further, both the policy and post orders appear to be outdated since the facility uses debit cards for its vending machine sales.

In a related area, Tallahatchie and the North Fork's visitation rules provided to visitors are not updated to reflect the use of debit cards instead of cash for vending machine purchases.

- At the Red Rock facility, officers temporarily assigned to visiting are not consistently documenting visitor's badge numbers, the table location where visitors are seated, and whether the visitor is a minor or adult.
  - At the Tallahatchie and Florence facilities, the visiting officer's post orders and the visitation policy contained conflicting directives regarding inmate searches. The post orders require inmates only be pat searched prior to a visitation while the policy requires an unclothed body search.
- Inmates Being Provided Outdated Institution Rules
- La Palma's inmates are provided outdated policy information. Institutional rules provided to the facility's inmates contain an outdated disciplinary section that does not reflect updated revisions to the California Code of Regulations.
- Prescription Medications Being Wasted
- According to the Tallahatchie facility management, approximately 20 percent of transferred inmates arrive with up to a 14-day supply of prescribed medication as directed by the California Prison Health Care Services (CPHCS). However, to comply with Mississippi law, the facility discards the medication because it cannot allow inmates to possess medications not issued by a Mississippi licensed pharmacist. Consequently, taxpayers incur the cost to replace the discarded medication. According to the chief of contract beds, CDCR is working with the CPHCS' office to minimize the effects of the Mississippi law.
- Operating Weaknesses in Central Control
- At Florence, OIG inspectors observed an emergency key set being issued without a central control custody officer obtaining a marker to identify the keys' recipient. Standard custody practices require accountability for all keys; however, without an identifying marker this is not possible.
  - Tallahatchie central control's emergency key log did not detail why emergency keys were issued. As a result, the facility cannot monitor the appropriate use of emergency keys.
  - Security cameras are sometimes malfunctioning or not correctly focused. For example, at La Palma, several central control monitored security cameras have not been automatically returning to the approved fixed location, and several other cameras were consistently out of focus. At North Fork, central control does not have a standard procedure on where its fence-line cameras should be pointed when

not operated manually. At Tallahatchie, we found a malfunctioning camera that was located in the area adjacent to the facility's high security administrative segregation unit. Finally, at Florence, North Fork and Tallahatchie, we found that central control officers were not notifying subsequent shifts of malfunctioning cameras.

➤ Poor Formatting of Inmate Escape Bulletins

- When prison employees transport inmates off grounds, the employees carry an inmate escape bulletin that contains a picture and vital information about each inmate in the event an inmate escapes. North Fork, La Palma and Florence's inmate escape bulletins did not contain the term "Escape" or a color picture of the inmate. As a result, the escape bulletin meant for quick public dissemination would not clearly identify the inmate as an escapee or include a high quality image of the inmate.

In a related area, we also found that Florence's transportation unit's equipment checklist indicates that escape bulletins are applicable only to court transports.

➤ Inmate Advisory Committees Lacking Continuity and Consistency

- Inmate Advisory Committee (IAC) meeting practices could be improved. For example, La Palma IAC meetings have not been held with the Northern Hispanic population in at least six months. In addition, one Red Rock housing unit did not have the IAC minutes posted because the unit manager was unaware that the IAC should use the bulletin board to post meeting results. The North Fork facility has been holding formal IAC meetings since March 2010; however, the meeting minutes had not been released to inmates as of May 2010 because management wants the IAC to first develop committee by-laws. We also found that North Fork posted IAC inmate meeting representatives' gang affiliation on its inmate bulletin board. Tallahatchie IAC meeting minutes were not being posted, and IAC inmate representatives complained that they were not being given access to locked down inmates.

➤ Insufficient Safeguarding for Inmate Correspondence Boxes

- Unsecured inmate correspondence boxes were found throughout Tallahatchie, which compromised inmate confidentiality and the integrity of the correspondence process. Specifically, the CDCR inmate appeals and CCA grievance boxes in housing unit D had no locks. At the time of our inspection, we found only a few documents in the boxes. Management said the boxes had just been replaced and maintenance had not yet placed locks on the boxes. We also found two inmate appeals boxes in housing unit E that did not have locks. The facility west wing's CDCR inmate appeals and CCA grievance boxes were also unsecured with several inmate complaints inside the boxes.