

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

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DATE: 11/20/98

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***Interim Monitoring Report
for
Conditions of Confinement at
Tallulah Correctional Center for Youth***

***Prepared for
State of Louisiana Department of Public Safety and Corrections
and the
US Department of Justice, Civil Rights Division, Special Litigation Section***

***Prepared by
Randall G. Hines, MJA
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November 11, 1998

***SIGN
RICHARD T. MARTIN
CLERK***

***FILED
U.S. DIST. COURT
MIDDLE DIST. OF LA.
98 NOV 20 PM 2:35***

Tallulah Correctional Center for Youth

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Tallulah Correctional Center for Youth

I. Executive Summary

The purpose of this report is to assess compliance activities of the Tallulah Correctional Center for Youth (TCCY) as stipulated in the *Interim Agreement* on conditions of confinement which was filed in the US District Court for the Middle District of Louisiana. It is also intended that the findings contained in the report be helpful to the facility by serving to inform and suggest possible alternatives for solving the difficulties which were discovered in the course of monitoring at TCCY.

Findings and conclusions contained in this report are the result of facility inspections, direct observation, document review, offender interviews and interviews with staff at the facility. Thirteen living units, two infirmaries, two control stations, an armory, food service facilities, recreational areas, administrative offices, and training facilities were all inspected as part of the monitoring process. Interviews were conducted with more than 50 facility staff including the positions of warden, deputy warden, assistant warden, school principal, administrative support staff, mental health director, program director, training director, caseworkers (counselors), nurses, majors, captains, lieutenants, and sergeants. Discussions with offenders from all living units about conditions and treatment programming were conducted during each site visit. In depth interviews were conducted with 10 offenders.

Initial findings indicate a good faith effort by the facility staff to comply with the standards set forth in the portion of the *Agreement* assigned to this monitor. Policy and procedures had been issued, supervisory staff had been instructed to implement the policy directives, and records had been created to document the compliance process. Deficiencies were noted in the areas of staff training and records management.

Included in this report are a set of recommendations that are intended to assist the facility in its attempt to build a better program for the offenders. Strategic planning is a critical part of any effort to change an organizational culture. It is my considered

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opinion that this facility has been evaluated sufficiently to begin the process of taking action steps toward building a better program. Opinions expressed in this report are based upon currently accepted standards for operation of juvenile correctional facilities and reflect 23 years of experience in the field of juvenile corrections as exhibited in the Curriculum Vitae found in Appendix A.

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II. The Monitoring Process

The monitoring team under the leadership of John Whitley set upon the task of measuring compliance with the stipulations of the Agreement by assigning specific monitoring responsibilities as a means of maximizing the efficiency and effectiveness of the team. As the team's juvenile institutions expert this monitor was assigned the responsibility for monitoring requirements of isolation found in paragraph 3 of the Agreement. In addition, monitoring activities were also conducted in the following areas:

- general conditions of confinement
- compliance with Project Zero Tolerance initiatives
- proper record keeping and reporting procedures
- response and corrective action for sustained allegations of abuse, improper use of force, and juvenile injuries
- abuse, violence, and sexual misconduct investigations at the facility
- retaliation against juveniles who report abuse or speak to Plaintiffs' counsel, the United States, or any member of the Monitoring Team

Monitoring activities were conducted during two independent site visits totaling more than 60 hours of work at the facility. The first site visit occurred on October 14-17, 1998, with the second site visit following on October 28-31, 1998. Interviews with offenders, wardens, security staff, nurses, teachers, caseworkers (counselors), mental health professionals, parents, and administrative support staff were conducted during site visits. Documents provided to the Monitor by the facility included, policy and procedures, policy memorandums, program participation logs, mechanical restraint logs, medical / administrative segregation logs, daily care records (medical), infirmary log books, use of force reports, accident / incident reports, unusual occurrence reports, Stage Review and Recommendation reports, TCCY Employee Manual, DPSC Manual

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of Disciplinary Rules and Procedures for Juvenile Offenders (1993 edition) and offender written statements. Written Policy and policy memorandums served as primary documentation for stipulated requirements under the Agreement. Applicable policy memorandums are exhibited in Appendix B. Secondary documentation which supported and corroborated adherence to written policies included other written documents, direct observations, and interviews.

During each site visit compliance was verified at each living unit by direct observation of program activities, interviews with staff, interviews with offenders, and document reviews. During these visits the monitor observed group disturbances, program removal (lockdown), disciplinary committee hearings, altercations between offenders, self mutilation by offenders, medical interventions, mental health care, boot camp drills, visitation, food service delivery, laundry services, offender work details and educational programming. Compliance with paragraph 3 of the Agreement was measured using the following ten items :

Item #1 Disciplinary hearings must be held within 24 hours (except weekends) for all offenders removed from programming.

Item #2 Stage I offenders must be reviewed weekly for reclassification (Phase II offenders only)

Item #3 Medical / Mental health review of all offenders placed in Stage 1, administrative segregation, or protective custody must be conducted every 12 hours.

Item #4 All offenders must be afforded program participation regardless of classification absent exceptions as stipulated.

Item #5 Removal from program (i.e. lockdown, admin. seg., or P.C.) must be approved by the shift supervisor.

Item #6 Removal from program and any exceptions from participation in program (use of isolation) must be documented in a log.

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Item #7 All offenders removed from program are evaluated by shift supervisor for possible participation in evening recreational activity.

Item #8 All offenders removed from program are permitted to participate in evening recreational activities unless interim behavior exceptions are documented (justifying continued removal).

Item #9 All offenders removed from program are offered program participation at the beginning of each day.

Item #10 Regular programming allows offenders time out of their room at least 7.5 hours per day. Time should be distributed across morning, afternoon, and evening segments.

Before presenting audit findings specifically for isolation practices at TCCY, a description of the general conditions of confinement is provided as a context for a broader understanding of facility operations.

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III. Conditions of Confinement

General Conditions

The conditions of confinement at TCCY were considered as a context for a broader understanding of important factors effecting compliance activities in general. Litigation experts at the American Bar Association's Juvenile Justice Center have identified specific areas vital to assessment of confinement conditions (Puritz, & Scali, 1998). These areas are overcrowding, staffing, safety, restraint & isolation practices, education, health care, recreation, staff training, and the environment. During the limited time at the facility, a preliminary assessment was conducted for a portion of the conditions identified by the ABA. As previously noted, restraint and isolation practices are considered separately in Chapter IV.

At the foundation of any assessment of facility function is the philosophy or mission for its operation. TCCY has a well developed articulate mission statement contained in the policy and procedures for the facility. The mission is found in TCCY Policy No. AM-01-003 (See Appendix C). Under the mission statement TCCY is first "to provide for the custody, control, care, and treatment of adjudicated offenders through enforcement of laws and implementation of programs designed to ensure the safety of the public, staff, and offenders and to reintegrate offender(s) into society.

One of the greatest difficulties confronting the operation of TCCY is the poverty of qualified applicants for employment as security staff. Small applicant pools coupled with low retention rates have brought security staffing at the facility to dangerously low levels particularly with regard to the number of competent staff in employment. State correctional officers from other facilities have been brought in to sub-fill vacant positions as an interim measure. Resignations of newly hired staff often occur within the first week of employment making it difficult to reduce the number of vacancies and

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the need for state support.

Supervision of staff is further confused by the existence of two seemingly parallel but unequal command structures. State officers are supervised by state supervisors who are trained to respond differently than TCCY staff. Facility security staff under the supervision of TCCY employees are designated to be the lead officers with support from state personnel. This is not always possible however due to low staffing levels resulting in state officers providing lead responsibilities with little knowledge of the offenders and procedures at TCCY.

Performance reviews for security staff are currently not being completed by supervisory staff. Difficulties in managing crisis in the facility have made this supervisory practice a low priority. Supervisors report that moral of security staff is very low and performance levels reflect this condition as evidence by incomplete work, chronic absenteeism, and low retention rates. Staff work in fear of termination due to recent firings of co-workers and on-going investigations by facility investigators, monitors, and Department of Justice.

Action was taken to reduce the offender population (to 536 offenders) as a strategy for reducing the stress on existing staff until vacancies could be filled. While the population reduction has been helpful, recruitment has not been successful in bringing staffing in the facility up to normal levels. Limits on the population should be maintained until the staffing shortage can be abated.

Safety issues at the facility are most critical in the area of violence between offenders and between offenders and officers. Altercations and group disturbances are daily occurrences at the facility. The lack of trained security staff has exacerbated this condition. A recent escape incident has further heightened concern for safety issues as these conditions are now effecting the public safety.

Brief observation of educational programming was conducted in both the Phase I and Phase II school programs during both site visits. Offenders appeared generally

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disengaged during class meetings. Sleeping in class and acting out behavior were pervasive. Time limits at the facility did not permit a more in depth review of the program performance indicators for the educational program.

The health care delivery system was adequately staffed in both Phase I and Phase II infirmaries. Offenders receive immediate medical attention when brought to the infirmary, and medical doctors were available to the facility for consultation and medical examinations. Offenders requiring specialized medical care were routinely transported to specialists and facilities outside the Tallulah area.

Mental health programs at the facility are staffed by a consulting psychiatrist, consulting psychologist, mental health director, program directors (one for each Phase), assistant program directors (one for each Phase) and 21 counselors (caseworkers) assigned to both Phases. Counselor positions are currently filled by non-licensed persons who are performing casework functions rather than psychotherapy. The facility administration was in the process of renaming these positions to caseworker to better reflect job function.

The administration and supervision of mental health services at TCCY appeared adequate for a facility of its size and mission. Appropriate facilities and support services were also available for the mental health delivery system. The delivery of counseling services and the integration of rehabilitation programming within the facility and in the community (probation contact) was severely lacking.

Counselor caseloads at the facility were approximately 25 offenders per position. Mental health administrators report that offenders receive contact with their counselor (caseworker) once a week for approximately 30 minutes. Offenders consistently reported time between contacts sometimes exceeds a week. This service level is grossly inadequate for this population.

In addition, "counseling contact" is not psychotherapy (as would be provided by a licensed professional counselor) which further diminishes the effectiveness of the

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mental health delivery system in its mission to treat and rehabilitate offenders. While it is recognized the current casework (paraprofessional helping services) are vital to the support of offenders in the facility, these services can not be expected to produce outcomes beyond the level of competence currently held by the service delivery personnel.

Reintegration process for offenders was virtually absent. Probation contact with offenders was nearly non-existent. This was confirmed by facility staff, offenders, and confirmed by the area juvenile probation supervisor. Changes in aftercare programming for institutionalized offenders by the juvenile probation department was underway during the site visits. Once implemented, the new programming will greatly enhance the rehabilitate outcome for offenders at TCCY.

Staff training at TCCY is coordinated by a full time training director responsible for developing the facility training plan and coordination of training delivery. The training director delivers most of the orientation training curriculum. Shortcomings were identified in the areas of specialized training for security staff. New staff are not afforded the depth of training necessary to work with the offender population. This is most critical in the area of interpersonal communication skills. Consistency in program and process was also identified as a important need in the staff development area. Frequent changes in administration and policy have exacerbated already marginal staff competency levels. These issues have resulted in low motivation burn out and a general lack of awareness for the complexity of institutional culture. In spite of these issues, staff are remaining on the job longer, slowly increasing competency levels, and mentoring by senior TCCY and DOC staff is being realized.

Other environmental issues including maintenance of the physical plant, food services, laundry services and housekeeping were also briefly assessed. The physical plant and living unit sanitation at TCCY were adequate for a facility of its age and occupancy load. Problems in the delivery of food services and clothing were chronic

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and sometimes severely inadequate.

Shortages in both food and clothing at critical times causes extreme stress in the offender population, escalation of acting out behavior which leads to confrontations and violence between offenders and staff. Shift captains can spend the majority of a shift dealing with inadequate clothing for offenders. Equally disturbing is the practice of controlling the number of portions given at meals preventing offenders from eating enough to satisfy hunger. Night time snacks were observed as insufficient in number of portions to satisfy the number of offenders in residence. This required one shift captain to barter with the offenders as a means to prevent a disturbance over the shortage.

Physical plant issues were minimal in scope but serious in nature. Phase I barracks buildings do not have adequate climate control (air conditioning) for the summer months. These building become so hot that occupancy becomes an egregious condition of confinement. This condition has also defeated the program of the Phase I program as a reward for offenders, as the buildings in Phase II have climate control. Offenders therefore act out to prevent transfer to Phase I from Phase II during the summer months.

Zero Tolerance Initiative

The Project Zero Tolerance program (PZT) requires that a balanced approach to reducing violence within the facility be used at TCCY (See Appendix D). The approach requires swift investigation and consequence for acts of violence. This is based on a philosophy that the least amount of force will be used to intervene with a preference for mediation or problem solving processes as an alternative to violence.

Monitoring of PZT procedures at the facility included direct observation of intervention by staff in group disturbances, individual restraint practices, complaint procedures, and records audits. While the program is structured appropriately, the policy of using least amount of force necessary and problem solving skills was not

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consistently followed.

These difficulties result from the poverty of training afforded to the staff in the area of crisis intervention alternatives and the lack of integration of a rehabilitative program model at TCCY. The goal of reducing violence can not be achieved if the current intervention practices are allowed to continue.

Investigations of Abuse

Primary responsibility for compliance monitoring activity in the investigations area was assigned to Mr. Mills. There were however, two cases of alleged staff abuse brought to my attention for review and further investigation. These investigations were not completed however due to the limited time available to the monitor under the Agreement.

Investigation process in one of these case did not follow the protocol for abuse investigation as outlined in the Agreement as the employee was not removed from contact with offenders while the investigation was in process. The employee had been previously investigated for allegations of similar misconduct for which the complaints were not sustained. The current allegations involved multiple offender victims.

Summary

There has been a good faith effort to bring the conditions of confinement within acceptable limits during the monitoring period. A strong sense of willingness for change was communicated by the administration and leadership at the facility.

As with any facility, strengths and weaknesses in the service delivery systems at TCCY were noted. The mission, physical plant, program components, and leadership stand out as assets for the development of a successful juvenile rehabilitation facility.

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Impacting this delivery system however, are deficits in the number of qualified direct care and counseling staff, crisis intervention training, effective supervision of direct care staff, and the integration of a rehabilitative program model.

Integrating a rehabilitative model or "therapeutic community" is an ongoing process that requires involvement at every level of the facility. Under such a model, treatment goals and processes are understood by staff in the facility, individually contracted with each offender, and frequently evaluated (end of each shift) by direct care staff (Van Voorhis, Braswell, & Lester, 1997).

Violence at TCCY is an indicator that the needs of the offender population are not being met. The state's worst juvenile offenders are being sent to the facility with the least competence for intervention with this population. Security officers have primary responsibility for care and custody and yet they do not understand the significance of self destructive behavior, mental retardation, personality disorders, or any other mental disorder that effects offenders.

What has evolved then is a culture where custody staff use the only skills they have to deal with acting out behavior of the offenders. These skills are predominately expressed in the use of force to physically control the situation. Physical control techniques are necessary for the safety and security of any facility but only as a last resort not as a primary response for working with delinquent youth.

Physical techniques also run a high risk for injury to staff and offenders even for highly trained staff. Over use of physical techniques elevates the risk of injury and establishes a cultural in the facility where in fighting is how we resolve disagreements. In time this process becomes "institutionalized" for the offenders as the way to engage and interact with staff. In short, what we do with people will be reflected back to us in their behavior. Unfortunately, this kind of cultural event has evolved at TCCY.

Violence is a serious indicator that the needs of the offender population are not being met by the staff. This is particularly clear in cases of self-mutilation (violence

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toward self) for which serious and chronic cases are present at TCCY. The presence of these conditions is indicative of the severe emotional pain and mental disturbance. Chances of a successful suicide by an offender are also elevated when these conditions become prevalent.

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IV. Use of Isolation

Under paragraph 3 of the Interim Agreement conditions are stipulated which apply to the use of isolation at TCCY. Compliance monitoring activities for these provisions were specifically assigned to this Monitor.

During the first site visit TCCY was found to be in substantial compliance with the requirements for isolation as stipulated in the agreement. This finding was justified by the following TCCY actions:

- Policy and procedures had been established by the warden
- Supervisory staff had knowledge and were acting in good faith to follow the procedures
- Documentation of good faith efforts were evident in facility records

Full compliance was not possible however due to the need for supervision and training of line staff and improved quality of the documentation process. Tables 1-4 depict compliance findings for the ten areas stipulated in the Agreement.

A finding of full compliance would require that acceptable levels of documentation were present across the areas of policy & procedure, supervisor knowledge, line staff knowledge, and quality of documentation. Acceptable levels are reflected in the Tables as a finding of either "Yes" or "Adequate". Unacceptable levels of documentation include "None", "No", and "Inconsistent" findings. The designation "N/A" means the category is not applicable under the Agreement.

Implementation of new isolation policy and procedures began on 10/1/98 with the issue of policy memorandums from the warden (See Appendix B). During the first site visit some confusion over the requirements for re-evaluation, continuance, and return of offenders removed from program were observed at the levels of Captain, Lieutenant and Sergeant.

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| Table 1: Isolation Requirements Phase I (First Visit) | | | | |
|--|-------------------------------|-----------------------------|-----------------------------|---------------------------------|
| Isolation Requirements | Policy & Procedure | Supervisor Knowledge | Line Staff Knowledge | Quality of Documentation |
| Disciplinary Hearing within 24 hrs. | Yes | Yes | No | Inconsistent |
| Reclass of Stage 1 weekly | N/A | N/A | N/A | N/A |
| Medical / Mental Health Review | Yes | Yes | Yes | Inconsistent |
| Prog. Participation for all Classifications | Yes | Yes | Inconsistent | Inconsistent |
| Prog. Removal Approved | Yes | Yes | Yes | Adequate |
| Prog. Removal Documented | Yes | Yes | Yes | Inconsistent |
| Prog. Removal Re-Evaluation | Yes | Inconsistent | No | none |
| Prog. Removal Continuance Document | Yes | Inconsistent | No | none |
| Prog. Removals Offered Program Daily | Yes | Inconsistent | No | none |
| Out of Room Time (7.5 hrs/day) | Yes | Yes | Inconsistent | Inconsistent |

Documentation was determined to be inconsistent as log entries and report forms did not always match entry for entry throughout the process. Problems with documentation arise out of the fact that duplication of recording processes are evident at the post, infirmary, control and supervisory levels. In short the recording system creates many opportunities for errors as recording of the same event is required at many locations. There is no master record for each unit, phase, or shift. These problems were consistent across Phase I and Phase II programs.

During the second site visit improvements in implementation processes for the isolation requirements were evident.

Substantially less confusion over the requirements for re-evaluation, continuance, and return of offenders who had been removed and isolated was achieved.

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| Table 2: Isolation Requirements Phase II - First Visit | | | | |
|---|-------------------------------|-----------------------------|-----------------------------|---------------------------------|
| Isolation Requirements | Policy & Procedure | Supervisor Knowledge | Line Staff Knowledge | Quality of Documentation |
| Disciplinary Hearing within 24 hrs. | Yes | Yes | No | Inconsistent |
| Reclass of Stage 1 weekly | Yes | Yes | No | None |
| Medical / Mental Health Review | Yes | Yes | Yes | Inconsistent |
| Prog. Participation for all Classifications | Yes | Yes | Inconsistent | Inconsistent |
| Prog. Removal Approved | Yes | Yes | Yes | Adequate |
| Prog. Removal Documented | Yes | Yes | Yes | Inconsistent |
| Prog. Removal Re-Evaluation | Yes | Inconsistent | No | None |
| Prog. Removal Continuance Document | Yes | Inconsistent | No | None |
| Prog. Removal Offered Program | Yes | Inconsistent | No | None |
| Out of Room Time (7.5 hrs/day) | Yes | Yes | Inconsistent | Inconsistent |

Documentation of re-evaluation and return of offenders from administrative segregation appeared more consistently in the records system across post, infirmary and supervisory logs. Problems of consistency still were apparent however as shown in a random audit of cases for both Phase I and II. The audit showed supervisor actions were not consistently documented in all records. These deficiencies can be easily corrected by eliminating some of the duplication in record keeping and providing additional supervisory training in records management.

Stage 1 re-classification processes were also evaluated during the second site visit. Offenders were reviewed by a committee consisting of a program counselor, and the phase II program director. Offenders were present at the review and recommendations were reviewed by the Mental Health Director and the Assistant Warden for Security.

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| Table 3: Isolation Requirements Phase I - Second Visit | | | | |
|---|-------------------------------|-----------------------------|-----------------------------|---------------------------------|
| Isolation Requirements | Policy & Procedure | Supervisor Knowledge | Line Staff Knowledge | Quality of Documentation |
| Disciplinary Hearing within 24 hrs. | Yes | Yes | Yes | Adequate |
| Reclass of Stage 1 weekly | N/A | N/A | N/A | N/A |
| Medical / Mental Health Review | Yes | Yes | Yes | Adequate |
| Prog. Participation for all Classifications | Yes | Yes | Inconsistent | Inconsistent |
| Prog. Removal Approved | Yes | Yes | Yes | Adequate |
| Prog. Removal Documented | Yes | Yes | Yes | Inconsistent |
| Prog. Removal Re-Evaluation | Yes | Yes | No | Inconsistent |
| Prog. Removal Continuance Document | Yes | Yes | No | None |
| Prog. Removal Offered Program | Yes | Yes | No | None |
| Out of Room Time (7.5 hrs/day) | Yes | Yes | Inconsistent | Inconsistent |

The primary consideration for decisions seemed to be a consideration of the offender's rule infraction history. No explanation was given in writing as part of the review process. Offenders seemed confused about how the committee reached its decision on re-classification. Dispositions by the committee were not clearly documented. In some cases, classification decisions were scratched out and changed in the record without notation to identify who changed the documents or why they were changed.

Program participation requirements were an area in which documentation was also inconsistent for both Phase I and Phase II programs. Offenders in Phase I segregation were not documented as having the necessary exceptions for continued isolation. In time compliance with the isolation requirements of the Agreement will be fully met by the facility. Progress toward correcting deficiencies continues to occur in a reasonable and acceptable manner for a facility of this size. Continued monitoring is indicated and recommend until full compliance has been maintained for at least six months.

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| Table 4: Isolation Requirements Phase II - Second Visit | | | | |
|--|-------------------------------|-----------------------------|-----------------------------|---------------------------------|
| Isolation Requirements | Policy & Procedure | Supervisor Knowledge | Line Staff Knowledge | Quality of Documentation |
| Disciplinary Hearing within 24 hrs. | Yes | Yes | Yes | Adequate |
| Reclass of Stage 1 weekly | Yes | Yes | Yes | Adequate |
| Medical / Mental Health Review | Yes | Yes | Yes | Adequate |
| Prog. Participation for all Classifications | Yes | Yes | Inconsistent | Inconsistent |
| Prog. Removal Approved | Yes | Yes | Yes | Adequate |
| Prog. Removal Documented | Yes | Yes | Yes | Inconsistent |
| Prog. Removal Re-Eval | Yes | Yes | No | Inconsistent |
| Prog. Removal Continuance Document | Yes | Yes | No | None |
| Prog. Removal Offered Program | Yes | Yes | No | None |
| Out of Room Time (7.5 hrs/day) | Yes | Yes | Inconsistent | Inconsistent |

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V. Recommendations and Conclusions

There is reasonable cause to believe restraint and isolation practices, staff training, mental health services, food services, and clothing provisions at TCCY are below acceptable standards of professional practice for juvenile correctional facilities. Egregious conditions have existed, currently arise, and will continue to occur which violate offender's individual rights to have protection from harm, sufficient food, and access to mental health services until compliance is achieved.

The staff of TCCY have made a good faith effort to bring their facility into compliance with many of the stipulations of the Agreement. At the heart of the difficulties confronting the staff in these efforts are the lack of sufficient and qualified staff to operate the facility, lack of enough mental health services for the needs of the offender population, a poverty of training specific to non-violent crisis intervention for security staff, and facility wide integration of goal directed rehabilitation programming.

A set of recommendations offered for improving these conditions of confinement are:

- Establish linkages with area university programs in criminal justice for internship and recruitment of qualified applicants. Offer incentives (relocation expenses, promotions, etc.) for staff from other regions of the state to transfer to TCCY.
- Classify offenders according to special needs and designate housing units according to needs classification. Do not allow different offender classifications to be mixed in population. Some examples of special populations are classifications based upon age of offenders (pre - adolescent, adolescent, and young adult), presence of sex offenses, mental retardation, and serious violent offenses.
- Provide immediate intensive non-physical crisis intervention training for

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all security staff thus giving them alternative methods for dealing with acting out behaviors of offenders.

- Increase therapeutic capacity by blending caseworker and security staff under the same supervision structure. This would require changes in security staff and caseworker job descriptions as well as the assignment of a core staff to each housing unit. Each unit would then be responsible for the rehabilitation and care of offenders in their custody.
- Create treatment teams for each offender from the personnel specifically assigned to his housing unit. The team approach allows for improved therapeutic effects as staff are more often available to deal with crisis intervention, evaluation of treatment progress, and as role models for pro-social skill development.
- Establish a positive behavior points system which shapes and reinforces positive behavior patterns which is in turn integrated with offender treatment goals.
- Eliminate duplicate record keeping systems and consolidate unit/program log books where practicable. Using a continuous log book system also assures that information is passed from one shift to the next.
- Continue to pursue improved educational programming for the offenders.

TCCY has all the necessary structural components to form a successful rehabilitation program for offenders. Integrating the rehabilitative process throughout the facility by creating a therapeutic community is a necessary first step in achieving success. Supervision and evaluation of program and staff performance are also critical for on-going successful operation of rehabilitation programs.

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VI. Certification

I declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge, information, and belief.

Randall Grant Hines, MJA

Randall Grant Hines, MJA
Juvenile Justice Consulting
7815 Misty Park Street
San Antonio, Texas 78250-4723

11/12/98

Date

Tallulah Correctional Center for Youth

APPENDIX A

Curriculum Vitae

Qualifications Narrative

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Curriculum Vitae

CENSUS

Randall Grant Hines was born February 5, 1955 in the city of Hudson, New York. He is married with four children and currently resides with his family in San Antonio, Texas. His professional practice in juvenile justice spans twenty three years.

EDUCATION

St. Mary's University - San Antonio, Texas
Doctor of Philosophy (Ph.D.) in Counseling (Entered Fall 1995)
Expected graduation May, 2000, degree not yet conferred.

St. Mary's University - San Antonio, Texas
Master of Justice Administration Degree, Corrections Concentration, 1996
Distinguished Graduate

University of Alaska - Anchorage, Alaska
Bachelor of Arts Degree, Justice Major, Sociology Minor, 1992

University of Alaska - Anchorage, Alaska
Associate of Arts Degree, Police Administration Major, 1976

Kenai Central High School - Kenai, Alaska
Diploma, 1973
National Honor Society

EXPERIENCE

Juvenile Justice Consulting - San Antonio, Texas
C.E.O. and Senior Consultant, 7/20/93 to the present. Directs consulting practice providing services which include expert witnessing, grant writing, program development, program evaluation, outcome studies, policy analysis, training, and information system design for human services systems.

St. Mary's University - San Antonio, Texas
Deputy Director, Center for Justice Policy, 2/21/96 - present.
Appointed as Deputy Director for the Center for Justice Policy at St. Mary's University to coordinate research operations for the center.

St. Mary's University - San Antonio, Texas

Adjunct Professor, Public Justice Department, 8/15/96 - present.
Appointed as adjunct faculty to teach *Juvenile Justice Systems, Correctional Treatment and Rehabilitation*, and *Introduction to Public Justice* at the undergraduate level.

North East Independent School District - San Antonio, Texas

Doctoral Intern for the *Parenting Program*, 8/15/97 - 5/22/98
Appointed to serve the district high schools as counselor for adolescent parents. Conducted group, family, couples, and individual psychotherapy with pregnant and new parents to prevent drop out.

George Gervin Youth Center Inc. - San Antonio, Texas

Program Director, Youth Mentoring Programs, 7/8/95 - 12/15/95.
Directed two youth mentoring programs for elementary and middle school youth.

Alaska Youth Corrections Administration - Juneau, Alaska

Associate Coordinator Statewide Youth Corrections Programs, 11/1/89 - 7/2/93. Staff position to the state Director of Youth Corrections, served as Accreditation Manager and Legislative Liaison to the Alaska State Legislature.

Alaska Council on Prevention of Alcohol and Drug Abuse Inc. - Anchorage, Alaska
Board Member, Board of Directors, 1989-1993.

Boys and Girls Club of Alaska - Anchorage, Alaska

Board Member, Youth Sports Advisory Board, 1988 - 1990.

Child Advocacy Network - Anchorage Alaska

Member, Task Force on Sexual Assault, 1984 - 1989.

McLaughlin Youth Center - Anchorage, Alaska

Special Services Officer, 5/1/78 - 10/30/89.
Upper management level juvenile correctional administrator in a medium/max security juvenile correctional and detention center.

McLaughlin Youth Center - Anchorage, Alaska

Youth Counselor III, 10/2/76 - 4/30/78.
Supervisory level juvenile correctional officer in a medium/max security juvenile correctional and detention center.

McLaughlin Youth Center - Anchorage, Alaska

Youth Counselor II, 1/1/76 - 10/1/76.
Journeyman level juvenile correctional officer in a medium/max security juvenile correctional and detention center.

McLaughlin Youth Center - Anchorage, Alaska

Youth Counselor I, 4/18/75 - 12/31/75.

Entry level juvenile correctional officer in a medium/max security juvenile correctional and detention center.

PUBLICATIONS AND WRITINGS

- Hines, Randall G. (1994). *Information Systems in Texas Juvenile Justice*, Professional Paper presented to a Seminar in Management of Information Technology, St. Mary's University School of Business Administration, San Antonio, Texas.
- Hines, Randall G. (1994). *Judicial Review of In-Custody Suicide: A Public Policy Analysis*, Professional Paper presented to a Seminar in Policing, St. Mary's University Graduate School, San Antonio, Texas.
- Hines, Randall G. (1994). *Texas Juvenile Justice Information Processing: A Critical View*, Professional Paper presented to a Seminar in Justice Administration, St. Mary's University Graduate School, San Antonio, Texas.
- Hines, Randall G. (1995). *Use of Force in Juvenile Correctional Facilities: An Evolving Standard of Decency*, National Policy Study for David Mandt and Associates, (In press), June 1995. Richardson, Texas.
- Hines, Randall G. (1996). *Juvenile Justice Race Based Decisions: The Unpacking of The Underclass Variable in Bexar County*, Master Thesis, St. Mary's University, August 1996. San Antonio, Texas.
- Hines, Randall G. and Camille R. Hines. (1997). *Conflict Resolution and Mediation Training: An Evaluation Report*, Weed and Seed Participants JustServ Program, San Antonio Police Department, San Antonio, Texas.

PROFESSIONAL TRAINING

- Alaska Division of Corrections Employee Orientation Training*, Alaska Department of Health & Social Services, October 28, 1975 - October 31, 1975.
- Interpersonal Maturity Level Classification System Training*, September, 1976 - October, 1977.
- Principles of Transactional Analysis Seminar*, Alaska Department of Health & Social Services, March 16, 1977.
- Supervisory Management Principles Seminar*, Alaska Department of Administration, April 4, 1977.

Measuring Job Performance Seminar, Alaska Department of Administration, May 2, 1977.

Managing Safety Creatively Seminar, Alaska Division of Risk Management April, 1983.

The Mandt System, Managing Non- Aggressive and Aggressive People, David Mandt & Associates, August 15, 1983 (Certified Trainer).

American Correctional Association Accreditation Process Seminar, American Correctional Association, February, 1984.

The Mandt System, Managing People, Trainer Recertification (1985).

The Mandt System, Managing People, Trainer Recertification (1987).

National Juvenile Corrections and Detention Aids Conference, American Correctional Association, Atlanta, Georgia, February 13, 1988 - February 15, 1988.

National Juvenile Corrections and Detention Forum Conference, American Correctional Association, St. Louis, Missouri, April 23, 1988 - April 26, 1988.

Adolescent Support Group Process Seminar, April 1988.

University of Alaska Annual School on Addiction Studies, May 1988.

Adolescent Substance Abuse Treatment Seminar, November 1988.

Adolescent Chemical Dependency and Anti-Social Personality Seminar, Dec. 9, 1988.

University of Alaska Children of Alcoholics Conference, April 30, 1989 - April 31, 1989.

Mandt System Managing People Trainer Recertification, May 15, 1989 - May 17, 1989.

National Maternal Child Health Conference - The Forgotten Child, San Francisco, California August 4, 1989 - August 6, 1989.

Training For Trainers Seminar, October 19, 1989 - October 20, 1989.

Seminar on State Advisory Groups, US Department of Justice, Office of Juvenile Justice and Delinquency Prevention, Anchorage, Alaska, November 4, 1989 - November 6, 1989.

Case Management Training Alaska Prober System, November 13, 1989 - November 15, 1989.

Attendant Shelter Care Training for Trainers, January 15, 1990 - January 19, 1990.

University of Alaska Children of Alcoholics Conference, March 16, 1990 - March 17, 1990.

Annual School on Addiction Studies, Mental Health Studies, and Domestic Violence, University of Alaska, May 21, 1990 - May 25, 1990.

Case Management System Trainer Seminar, Division of Family and Youth June 25, 1990 - June 27, 1990.

Attendant Shelter Care Trainers Seminar, June 27, 1990 - June 28, 1990.

National Conference on Corrections, American Correctional Association San Diego, California, August 13, 1990 - August 16, 1990.

Aggression Replacement Training for Adolescents Seminar, August 28, 1990.

Government and Private Foundation Grant Process Seminar, November 15, 1990.

Management Seminar for Trainers, January 16, 1991 - January 18, 1991.

The Mandt System, Managing People, Trainer Recertification January 14, 1994.

GRANTS AND CONTRACTS

Center for Justice Policy, St. Mary's University, San Antonio, Tx. - 1998
Currently drafting a proposal to an RFP from the Office of Juvenile Justice and Delinquency Prevention, US Department of Justice as the national evaluator for Truancy Reduction Demonstration Programs.

Juvenile Justice Consulting, San Antonio, Tx. - 1998
Expert - One of four national experts invited by the US Department of Justice and the State of Georgia to propose on the multi-year contract for a state juvenile justice monitor.

Juvenile Justice Consulting, San Antonio, Tx. - 1997
Consultant - Designed, conducted, and published the program evaluation for the Conflict Resolution and Mediation Training Program under the Weed and Seed National Participants JustServ Program initiative for the San Antonio Police Department.

Center for Justice Policy, St. Mary's University, San Antonio, Tx. - 1996
Deputy Director for Operations - Directed the field research, data collection, and analyses activities for the San Antonio Police Department Weed and Seed Expansion Evaluation Project.

Center for Justice Policy, St. Mary's University, San Antonio, Tx. - 1996
Deputy Director for Operations - Directed the field research, data collection, and analyses activities for Impact and Process Evaluation of the Youth Firearm Violence Initiative project for the San Antonio Police Department.

George Gervin Youth Center, San Antonio, Tx. - 1995.
Program Director - Directed two youth mentoring grants programs for which duties included program performance reports, budget management, and employee supervision and training.

George Gervin Youth Center, San Antonio, Tx. - 1995.
Grant Writer - Co-author of the C.A.R.E.S. truancy reduction program for local area public housing projects.

David Mandt and Associates, Dallas, Tx. - 1995
Consultant - Prepared proposal for staff training services in management of aggressive and violent juvenile clients for the State of Oklahoma, Department of Human Services.

David Mandt and Associates, Dallas, Tx. - 1994
Consultant - Prepared proposal for staff training services in management of aggressive and violent juvenile clients for Commonwealth of Virginia, Department of Youth and Family Services.

Department of Health & Social Service Juneau, Ak. 1990 - 1993.
Grant Reviewer - Served on review committees for social services, mental health, and juvenile justice grants for state and federal pass through grants.

PUBLIC & MEDIA PRESENTATIONS

House Committee on Health & Social Services - Alaska Legislature
Legislative Liaison - Department of Health & Social Services 1989 - 1993. Presented bill analysis and position papers on juvenile waiver, curfew laws, youth court, juvenile sentencing, runaway and homeless youth, conditions of confinement, and agency operations .

Senate Committee on Health & Social Services - Alaska Legislature
Legislative Liaison - Department of Health & Social Services 1989 - 1993. Presented bill analysis and position papers on juvenile waiver, curfew, youth court , juvenile sentencing, runaway and homeless youth, conditions of confinement, and agency operations .

House Committee on Finance - Alaska Legislature
Legislative Liaison - Department of Health & Social Services 1989 - 1993. Presented Fiscal Analysis for pending legislation affecting the department.

Senate Committee on Finance - Alaska Legislature
Legislative Liaison - Department of Health & Social Services 1989 - 1993. Presented Fiscal Analysis for pending legislation affecting the department.

House Judiciary Committee - Alaska Legislature
Legislative Liaison - Department of Health & Social Services 1989 - 1993. Presented bill analysis and position papers on juvenile waiver, curfew, youth court, juvenile sentencing, runaway and homeless youth, conditions of confinement, and agency operations.

Senate Judiciary Committee - Alaska Legislature
Legislative Liaison - Department of Health & Social 1989 - 1993. Presented bill analysis and position papers on juvenile waiver, curfew, youth court, juvenile sentencing, runaway and homeless youth, conditions of confinement, and agency operations.

Joint Senate & House Children's Caucus - Alaska Legislature
Punishment v. Treatment Dichotomy in Juvenile Justice - Special Presentation, April, 1993.

Children Killing Children - Expert Panel Discussion
KSAT Television, Channel 22, San Antonio, Texas April 30, 1998.

CASE CONSULTATION AND EXPERT TESTIMONY

Newton v. PIA Lawton, Inc., (1995) Lawton, Oklahoma
Provided consultation and expert opinion for David Mandt and Associates as the plaintiff's consultant.
Excessive use of force in a psychiatric hospital (Civil Tort).

Mapes v. Moore, (1996) Topeka, Kansas
Provided case consultation expert opinion for the plaintiff.
Excessive use of force juvenile correctional institution (Constitutional Tort).

Davis v. Broadlawns Medical Center, (1997) Des Moines, Iowa
Provided case consultation, expert opinion, and trial testimony for the plaintiff.
Excessive use of force psychiatric hospital (Civil Tort).

Doe v. The Wackenhut Corporation, (1997) Austin, Texas
Provided case consultation for the defendant.
Conditions of confinement juvenile correctional institution (Constitutional Tort).

Goldman v. Pioneer Nursing Home Inc., (1998) Oklahoma City, Oklahoma
Provided case consultation and Expert Opinion for Plaintiff.
Excessive Use of Force, Wrongful Death Mental Health Facility
(Civil Tort).

Amy Barton, et al. v. The Wackenhut Corporation, (1998) Dallas, Texas
Provided case consultation and site evaluation for defendant
Conditions of confinement juvenile correctional institution
(Constitutional Tort - Class Action).

Addendum to Curriculum Vitae
Randall G. Hines, MJA

Qualifications Narrative

Juvenile Justice Consulting is a sole-proprietorship established to provide a broad range of consulting services to private and public human service agencies. Innovation in the field of juvenile justice has been the focus of JJC since its founding in 1993. JJC is a firm committed to total quality management, working to achieve the best interventions for youth, families, and communities. Studies in use of force in juvenile correctional facilities and minority confinement are the most recent research efforts conducted by JJC. The firm has also been involved extensively in program evaluation of community policing grants, state strategic planning for violent crime control, and compliance auditing under a consent decree for a large metropolitan police department.

Mr. Randall Hines, MJA, Chief Executive Officer brings many years of experience in juvenile justice to the firm. He has accumulated more than twenty-three years of experience in the administration of juvenile justice agencies. During his tenure with Alaska's juvenile justice agency he served as acting director for the agency, legislative liaison officer, statewide accreditation manager, training director, chief of security & safety, medical services administrator, admissions and discharge supervisor, institutional treatment/discipline board member, building maintenance manager, construction supervisor, counselor supervisor, and youth counselor. He recently designed and implemented a youth mentoring program for the George Gervin Youth Center in San Antonio. He presently serves as an Adjunct Professor of Public Justice at St. Mary's University in San Antonio, specializing in juvenile justice and correctional rehabilitation, while finishing a doctorate degree in Counseling. He currently holds a graduate degree in Justice Administration. His specific qualifications applicable to work as a monitor are as follows:

- *Juvenile Justice Administration*

Mr. Hines served as Acting Director for the Division of Family and Youth Services during the Director's absence (1992-1993). His responsibilities included the management of a 40 member central office staff and more than 600 field staff, including five institutions and 13 juvenile probation offices. The division's budget exceeded 70 million dollars annually. Mr. Hines acted as legislative liaison for the department on all matters pertaining to juvenile delinquency law in the Alaska State Legislature. He was statewide Accreditation Manager for all juvenile correctional institutions and probation services. He also assisted the state Juvenile Justice Specialist in monitoring and compliance pertaining to the federal Juvenile Justice and Delinquency Act.

- *Juvenile Institution Safety and Security Operations*

Mr. Hines served as institutional security director for eleven years in a large juvenile institution in Alaska. He conducted more than 1,000 hours of staff training in security practices and safety procedures and intervened in more than 150 escape attempts. He also intervened in more than 100 institutional emergency situations including assaults, fires,

suicide attempts, introduction of drugs and weapons, and bomb threats.

- ***Educational Programs for Detained Institutionalized Youth***

Mr. Hines conducted more than 100 hours of training for educational staff in youth facility safety and security practices, treatment strategies, and crisis management techniques. He worked extensively with institutional school principals and teachers toward the integration of educational and psychotherapeutic goals for each youth to meet federal and state mandates for services to this emotionally disturbed and learning disabled population. This process was afforded to all youth appearing before the institutional treatment board (see mental health care below). He also supported educational opportunities in the community for those youth needing opportunities not available in the facility.

- ***Medical Care Services for Detained and Institutionalized Youth***

Mr. Hines directed and monitored all institutional medical personnel in the provision of the health care delivery system for Alaska's largest juvenile institution serving more than 1,000 youth per year. These services included medical screening, sick call, physician examinations, specialized care for chronic illness, acute care, emergency medical response, and dental care.

- ***Mental Health Care for Detained and Institutionalized Youth***

Mr. Hines served as institutional treatment board member for eight years. He was responsible for assessment of treatment progress, referral for special needs, determination of program classifications, and decisions for release. During his tenure, more than 1,500 treatment plan reviews, 800 program releases, and approximately 4,500 special needs and discipline classifications were reviewed and approved.

- ***Treatment Programming for Juvenile Facilities***

Mr. Hines developed and implemented specialized treatment interventions for institutionalized youth to include substance abuse assessment and treatment, sexual offender treatment, family assessment and counseling, sexual identity treatment, and suicide crisis intervention.

- ***Use of Force Practices for Juvenile Institutions***

Mr. Hines evaluated more than 1,000 critical incidents involving the use of physical and mechanical restraint practices in juvenile facilities, drafted policy and procedures for the management of crisis and violence in institutions, and conducted training for staff in restraint and de-escalation techniques. He conducted more than 1,000 hours of staff training in physical and non-physical management techniques.

- ***Institutional Investigation Experience***

Mr. Hines conducted more than 1,500 criminal and non-criminal investigations of staff and resident misconduct in juvenile facilities. As an investigator, he worked extensively with police, district attorneys, and courts in the prosecution of criminal law violations occurring

inside and outside the facility. He also conducted more than 400 employee background investigations for the institution's personnel department.

- ***Juvenile Law and Court Procedure***

Mr Hines conducted more than 500 hours of staff training in juvenile justice law and administrative procedures. He supervised the legal admission process for more than 12,000 juvenile offenders to the facility to include traffic, criminal, immigration, and interstate cases. Mr. Hines currently serves as Adjunct Professor of Public Justice at St. Mary's University specializing in juvenile justice law and procedures. He is also a recognized expert witness by federal state courts in matters pertaining to conditions of confinement and use of force in juvenile facilities.

- ***Auditing Juvenile Facilities***

Mr. Hines served four years as Alaska's Accreditation Manager for all Youth Corrections facilities and probation offices. He conducted numerous field audits, assisted programs with compliance problems, and achieved ACA accreditation with all programs.

- ***Research, Statistical Processes, and Information Systems***

Mr. Hines is a competent and experienced research and statistical methodologist with twenty years experience in the field of data collection and analysis in juvenile justice systems. He has conducted studies on recidivism, personality and behavior inventory assessments, minority confinement, use of force practices, youth handgun violence, and attachment disorders in homicidal children. He also has extensive experience with the design and development of juvenile justice information systems for the processing of intake, probation, and institutional cases.

Over the past twenty-three years Mr. Hines has worked as a practicing professional in juvenile justice systems. He has been recognized as an expert witness by state and federal courts in litigation concerning juvenile facility conditions of confinement and use of force. Research and field work have been combined in recent years to strengthen his continuing practice in the profession. Practice and research competencies are well documented in Mr. Hines' vitae. There are four relevant projects supporting application for the position of monitor.

- ***Accreditation Project for Alaska's Youth Corrections Facilities and Probation Services, November 1989 - June 1993.***

Mr. Hines served as statewide Accreditation Manager for institutional and probation programs. ACA accreditation for the facilities was received in 1990, with probation services receiving accreditation in late 1993. Extensive audits were performed spanning four years.

Contact Person: Richard F. Illias, Youth Corrections Administrator (retired)
4351 Gooding Ave. Bellingham, Washington 98226
Telephone: (360) 715-2907

- **Trial consultant and testifying expert in the matter of Mapes v Moore for the plaintiff, August 1996.**

This matter was a constitutional tort concerning the excessive use of force resulting in the death of a youth incarcerated in a state juvenile justice facility.

Contact Person: William J. Pauzauskis, Attorney for the Plaintiff

216 S.W. Seventh Street Topeka, Kansas 66603-3717

Telephone: (913) 233-8900

- **Conflict Resolution and Mediation Training Evaluation Project, January 1997.**

Mr. Hines conducted a program evaluation for St. Mary's University and the San Antonio Police Department on a school based mediation project.

Contact Person: Dr. Ray Leal, Department of Public Justice

St. Mary's University, One Camino Santa Maria San Antonio, Texas 78228

Telephone: (210) 431-6850

- **Site Auditor and Data Integrity Consultant for Public Management Resources, October, 1997; November, 1997; and February, 1998.**

Mr. Hines served as Site Auditor and Data Integrity Consultant for the audit project with Public Management Resources on the Consent Decree between City of Pittsburgh Bureau of Police and US Department of Justice.

Contact Person: Dr. James Ginger, Public Management Resources

10402 Severn Road, Suite 200 San Antonio, Texas 78217

Telephone: (210) 637-6634

Tallulah Correctional Center for Youth

APPENDIX B

TCCY Policy Memorandums



October 1, 1998

TO: ALL TCCY CORRECTIONAL STAFF

FROM: Gary G. Gremillion
Warden

A handwritten signature in black ink, appearing to be "GG", is written over the printed name "Gary G. Gremillion".

RE: USE OF CHEMICAL AGENTS

The below listed procedures regarding the use of chemical agents must be strictly adhered to without fail:

PROCEDURES

1. Chemical agents shall not be carried on the person of any individual.
2. Chemical agents will only be stored in the Phase I and Phase II Control Centers in the locked areas designated for this purpose.
3. If present at the facility, only the Warden, Deputy Warden, or Assistant Warden for Security may authorize the removal of and use of chemical agents from the designated areas. If none of these are available, authorization must come from the highest ranking staff member present.
4. Chemical agents may only be authorized when at the time of authorization and use:
 - a. An offender is posing a direct and immediate threat of injury to staff or another offender.
 - b. An offender is creating a disturbance that jeopardizes the effective monitoring and supervision of the unit to the extent that the safety of offenders and staff is endangered, and the use of chemical agents is the only means to avoid a physical confrontation that would likely result in injury to the offender or staff.

Trans-American Development Associates, Inc.

- c. The use is necessary to prevent the commission of a felony including escape.
- d. The use is necessary to prevent or quell a riot.
- 5. **EXCEPTION:** Prior approval is not required if chemical agents are required to stop a large scale disturbance (such as an attempted mass escape) that poses an imminent danger to the public, staff, or other juvenile, so long as the Warden, Deputy Warden, or Assistant Warden is notified as soon as practicable.
- 6. All uses of chemical agents must be documented using the attached form by the person authorizing the use.

TALLULAH CORRECTIONAL CENTER FOR YOUTH

Chemical Agent Authorization/Use Documentation Form

Date of Incident: _____ Time of Incident: _____ Location: _____

Offender(s) Name and JIRMS #: _____

Removal from Secure Storage:

Chemical agents were removed from secure storage after:

_____ Contact with the Warden, Deputy Warden, Assistant Warden for Security or highest ranking security officer* who was enroute to personally observe the situation prior to authorizing usage (circle as appropriate)

If highest ranking officer: Name and Title _____

_____ Personal observation of the situation by the Warden, Deputy Warden, Assistant Warden for Security or highest ranking security officer* (circle as appropriate)

If highest ranking officer: Name and Title _____

_____ It was determined by _____ that a large scale disturbance existed that posed an imminent threat to the public, staff or offenders

_____ Highest ranking security officer only if Warden, Deputy Warden or Assistant Warden for Security not available or on duty

Authorization for Use:

Chemical agents were authorized for use by the person who authorized removal from storage because:

_____ The offender(s) was posing a direct threat to staff/another offender

_____ The offender was creating a disturbance which jeopardized the effective monitoring and supervision of the unit to the extent that the safety of staff or other offenders was endangered. The use of chemical agents was determined to be the only means to avoid a physical confrontation which would likely result in injury to the offender or staff.

_____ A felony was about to be committed (this includes escape)

_____ There was an imminent threat of or need to quell a riot

_____ There was a large scale disturbance with an imminent threat to the public, staff or offenders

Use of chemical agents was authorized by:

Name: _____

Title: _____

Time of Authorization: _____

Interim monitor notified by:

Name: _____

Title: _____

Time of Notification: _____

_____ If applicable, the Warden, Deputy Warden or Assistant Warden for Security were notified of the use of chemical agents by:

Name: _____

Title: _____

Time of Notification: _____

(Completed By)

(Title)

(Date)

NOTE: THE CIRCUMSTANCES SURROUNDING ALL "AUTHORIZATIONS" MUST BE THOROUGHLY DOCUMENTED ON

TALLULAH CORRECTIONAL CENTER FOR YOUTH
Chemical Agent Authorization/Use Documentation Form

Date of Incident: _____ Time of Incident: _____ Location: _____

Offender(s) Name and JIRMS #: _____

Removal from Secure Storage:

Chemical agents were removed from secure storage after:

_____ Contact with the Warden, Deputy Warden, Assistant Warden for Security or highest ranking security officer* who was enroute to personally observe the situation prior to authorizing usage (circle as appropriate)

If highest ranking officer: Name and Title _____

_____ Personal observation of the situation by the Warden, Deputy Warden, Assistant Warden for Security or highest ranking security officer* (circle as appropriate)

If highest ranking officer: Name and Title _____

_____ It was determined by _____ that a large scale disturbance existed that posed an imminent threat to the public, staff or offenders

_____ Highest ranking security officer only if Warden, Deputy Warden or Assistant Warden for Security not available or on duty

Authorization for Use:

Chemical agents were authorized for use by the person who authorized removal from storage because:

_____ The offender(s) was posing a direct threat to staff/another offender

_____ The offender was creating a disturbance which jeopardized the effective monitoring and supervision of the unit to the extent that the safety of staff or other offenders was endangered. The use of chemical agents was determined to be the only means to avoid a physical confrontation which would likely result in injury to the offender or staff.

_____ A felony was about to be committed (this includes escape)

_____ There was an imminent threat of or need to quell a riot

_____ There was a large scale disturbance with an imminent threat to the public, staff or offenders

Use of chemical agents was authorized by:

Name: _____

Title: _____

Time of Authorization: _____

Interim monitor notified by:

Name: _____

Title: _____

Time of Notification: _____

_____ If applicable, the Warden, Deputy Warden or Assistant Warden for Security were notified of the use of chemical agents by:

Name: _____

Title: _____

Time of Notification: _____

(Completed By)

(Title)

(Date)

NOTE: THE CIRCUMSTANCES SURROUNDING ALL "AUTHORIZATIONS" MUST BE THOROUGHLY DOCUMENTED ON

TALLULAH CORRECTIONAL CENTER FOR YOUTH
Chemical Agent Authorization/Use Documentation Form

Date of Incident: _____ Time of Incident: _____ Location: _____

Offender(s) Name and JIRMS #: _____

Removal from Secure Storage:

Chemical agents were removed from secure storage after:

_____ Contact with the Warden, Deputy Warden, Assistant Warden for Security or highest ranking security officer* who was enroute to personally observe the situation prior to authorizing usage (circle as appropriate)

If highest ranking officer: Name and Title _____

_____ Personal observation of the situation by the Warden, Deputy Warden, Assistant Warden for Security or highest ranking security officer* (circle as appropriate)

If highest ranking officer: Name and Title _____

_____ It was determined by _____ that a large scale disturbance existed that posed an imminent threat to the public, staff or offenders

Highest ranking security officer only if Warden, Deputy Warden or Assistant Warden for Security not available or on duty

Authorization for Use:

Chemical agents were authorized for use by the person who authorized removal from storage because:

_____ The offender(s) was posing a direct threat to staff/another offender

_____ The offender was creating a disturbance which jeopardized the effective monitoring and supervision of the unit to the extent that the safety of staff or other offenders was endangered. The use of chemical agents was determined to be the only means to avoid a physical confrontation which would likely result in injury to the offender or staff.

_____ A felony was about to be committed (this includes escape)

_____ There was an imminent threat of or need to quell a riot

_____ There was a large scale disturbance with an imminent threat to the public, staff or offenders

Use of chemical agents was authorized by:

Name: _____

Title: _____

Time of Authorization: _____

Interim monitor notified by:

Name: _____

Title: _____

Time of Notification: _____

If applicable, the Warden, Deputy Warden or Assistant Warden for Security were notified of the use of chemical agents by:

Name: _____

Title: _____

Time of Notification: _____

 (Completed By)

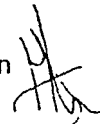
 (Title)

 (Date)

NOTE: THE CIRCUMSTANCES SURROUNDING ALL "AUTHORIZATIONS" MUST BE THOROUGHLY DOCUMENTED ON

October 1, 1998

TO: ALL TCCY EMPLOYEES

FROM: Gary G. Gremillion
Warden 

RE: INTERIM SETTLEMENT AGREEMENT

In accordance with the above captioned settlement agreement, the policies/procedures attached hereto shall be adhered to without fail. THESE POLICIES/PROCEDURES SUPERSEDE ANY PREVIOUS POLICIES, PROCEDURES, OR MEMORANDA REGARDING THESE SUBJECTS. **ANY FAILURE TO COMPLY WITH THESE PROCEDURES MUST BE REPORTED TO MY OFFICE IMMEDIATELY.**

This is for your information.

cc: Deputy Warden Holliday
Assistant Warden Gilfoil
Assistant Warden Allen

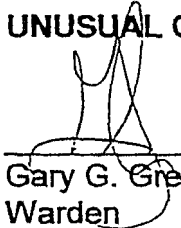
Attachments: "Settlement Agreement Policy/Procedure" One (1) thru Six (6)

SETTLEMENT AGREEMENT POLICY AND PROCEDURE #1

SUBJECT: ADMINISTRATIVE SEGREGATION/STAGE 1/PROTECTIVE CUSTODY

PROCEDURES:

- ♦ Committee hearings will continue to be held everyday, excluding weekends and holidays unless otherwise instructed by the Warden or his designee.
OFFENDERS WHO ARE PLACED IN ADMINISTRATIVE SEGREGATION FOR "PRE-COMMITTEE DISCIPLINARY HEARINGS" MUST BE HEARD WITHIN 24 HOURS (actually the next days' scheduled hearings). IT IS THE RESPONSIBILITY OF THE SHIFT SUPERVISOR TO REPORT TO THE ASSISTANT WARDEN FOR SECURITY, ANY OFFENDER WHO REMAINS IN ADMINISTRATIVE SEGREGATION IN VIOLATION OF THIS DIRECTIVE. ABSENT A CLEAR, IMMINENT DANGER TO STAFF OR OTHER OFFENDERS, THESE OFFENDERS WILL BE RETURNED TO THEIR REGULAR HOUSING UNIT. ALL SUCH OCCURRENCES MUST BE THOROUGHLY DOCUMENTED ON AN UNUSUAL OCCURRENCE REPORT.
- ♦ Offenders assigned to the STAGE 1 program will be evaluated each Thursday for reclassification purposes by the Director of Mental Health or designee, and the Assistant Warden for Security or designee. All such reviews will be thoroughly documented and placed in the offenders case record with a copy to the Warden's office.
- ♦ Offenders housed in Administrative Segregation, Protective Custody, or STAGE 1 will be reviewed by a medical or mental health professional at least every twelve hours. The first twelve hour review each day will be conducted between the hours of 5:00 AM and 5:00 PM, and the second review will be conducted between the hours of 5:00 PM and 5:00 AM the next day. *To the extent possible, reviews should be conducted between the hours of 8:00 AM and 10:00 AM and 8:00 PM and 10:00 PM in order to provide as broad coverage as possible.* Minimally, these reviews will consist of a visual, verbal, and meaningful contact with each offender. These reviews may be conducted during pill call, sick call, PZT rounds, or "other rounds" as determined by the Director of Mental Health and the Director of Nursing, and thoroughly documented in the designated logbooks.
- ♦ **EMERGENCY SITUATIONS WILL BE THE ONLY ACCEPTABLE REASON FOR FAILURE TO COMPLY WITH THESE DIRECTIVES. ANY FAILURE TO COMPLY WITH THESE DIRECTIVES MUST BE DOCUMENTED ON AN UNUSUAL OCCURRENCE REPORT.**




Gary G. Gremillion
Warden

SETTLEMENT AGREEMENT POLICY/PROCEDURE #2

SUBJECT: PROGRAM PARTICIPATION

PROCEDURES:

- ◆ Regardless of classification or disciplinary status (including placement in Administrative Segregation), every offender shall be permitted to participate in educational, recreation, and other program activities each day. Participation may only be ended if the offender engages in:
 1. Repeated failure to follow orders where the failure to comply in destabilizing.
 2. Repeated interference with staff or other offender's duties.
 3. Improper sexual behavior.
 4. Fighting.
 5. Substantial destruction of property.
 6. Violent conduct that creates an imminent danger to other offenders or staff.
- ◆ The decision to remove an offender from programming shall be approved by the Shift Supervisor or above and documented in the designated logbook.
- ◆ If an offender is removed from programming before noon, the offender shall be evaluated by the Shift Supervisor before evening recreation to determine if the offender can be permitted to participate in evening recreation. The offender shall be permitted to participate in evening recreation unless the Shift Supervisor determines that, based on documented interim behavior (behavior since the offender was removed from programming), the offender is likely to engage in conduct described above. The basis for this belief will be documented in the designated logbook.
- ◆ Offenders who are removed from programming for three (3) consecutive days may be referred to the Mental Health Department for an evaluation by the psychologist.
- ◆ **OFFENDERS NOT DISALLOWED FROM PROGRAM ACTIVITIES DESCRIBED HEREIN SHALL BE PERMITTED OUT OF THEIR CELLS FOR AT LEAST SEVEN AND ONE-HALF HOURS EACH DAY.**




Gary G. Gremillion
Warden

SETTLEMENT AGREEMENT POLICY/PROCEDURE #3

SUBJECT: RETALIATION, ABUSE, SEXUAL MISCONDUCT

PROCEDURES:

- ◆ Under no circumstances are staff allowed to retaliate against offenders who report abuse or sexual misconduct to ANYONE. ANYONE includes but is not limited to; attorneys, the Department of Justice staff, or the Monitoring Team assigned to TCCY.
- ◆ TCCY employees who are under investigation for abuse of or sexual misconduct with offenders will be suspended from duty provided there is a reasonable basis to believe that the abuse/sexual misconduct may have occurred. Staff so suspended shall be in accordance with TCCY policies regarding suspensions.



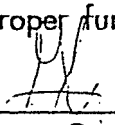
Gary G. Gremillion
Warden

SETTLEMENT AGREEMENT POLICY/PROCEDURE #4

SUBJECT: ACCESS TO COUNSEL

PROCEDURES:

- ♦ Offenders shall be ensured of "free and unfettered" access to their attorneys and the plaintiffs attorney in accordance with department regulations regarding same.
- ♦ The telephone numbers of Mr. Keith Nordyke, the attorney for the offenders at TCCY, Mr. David Utter, the attorney in the Barry A. litigation, and Ms. Judith Preston, representing the United Department of Justice, will be added to the telephone list of every offender at TCCY. These numbers will be "in addition to" the telephone numbers normally allowed by TCCY policy.
- ♦ The Assistant Warden for Administrative Services will personally call the "PZT HOTLINE" on each offender telephone by October 3, 1998 to ensure that they are functioning properly, and provide a report to the Warden's office by 8:00 A.M. October 4, 1998. Further, the Administrative Warden for Administrative Services is responsible for ensuring that the "PZT HOTLINE" phones are monitored to ensure proper functioning on an ongoing basis until further notice.



Gary G. Gremillion
Warden

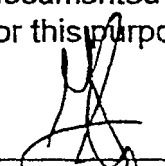
SETTLEMENT AGREEMENT POLICY/PROCEDURE #5

SUBJECT: MECHANICAL RESTRAINTS

PROCEDURES:

Effective immediately, the following procedures will be strictly adhered to:

- ◆ Legirons and handcuffs will be used for trips outside the institution in accordance with previously established TCCY policies and procedures.
- ◆ Legirons and/or handcuffs may only be used for movement inside the institution under the following circumstances:
 1. If the offender is a documented, current, escape risk or has engaged in a recent pattern of assaultive behavior towards staff as determined and authorized by the Shift Supervisor.
 2. Handcuffs may be used to transport an offender to a more restrictive housing area after a fight or other serious incident.
 3. Restraints may not be used during programming.
- ◆ All uses of mechanical restraints, other than for outside transportation, must be documented on an Unusual Occurrence Report, and in the logbook designated for this purpose.



Gary G. Gremillion
Warden

SETTLEMENT AGREEMENT POLICY/PROCEDURE #6

SUBJECT: REPORTING REQUIREMENTS

PROCEDURES:

The "settlement agreement" referenced above requires strict, weekly, reporting in several areas. Reporting time frames will be midnight Sunday, until midnight Sunday of each week. As such, the following procedures must be adhered to without fail:

- ◆ The Director of Nursing is responsible for providing copies of all Accident and Incident Reports to the Warden's Office. The Warden's Secretary is responsible for maintaining a file of all such reports in accordance with the previously described time frame.
- ◆ The Assistant Warden for Security is responsible for maintaining a file of all Unusual Occurrence Reports involving a "use of force", which includes, use of chemical agents, uses of restraints other than for transportation of offenders outside the institution, and any other "significant" uses of force. These reports will be forwarded to the Warden's Secretary by noon each Monday.
- ◆ The Quality Assurance Officer for Investigations is responsible for maintaining a file on every allegation of abuse by staff on offender, including every completed investigation. This information is to be forwarded to the Warden's Secretary by noon each Monday.
- ◆ Each Shift Supervisor is responsible for providing the Warden's Secretary with copies of all documentation prescribed in "Settlement Agreement Policy/Procedure #6" of this directive by noon each Monday.
- ◆ The Warden's Secretary is responsible for compiling all of the aforementioned information and forwarding it to Mr. William Kline in the Secretary's office via express mail no later than noon each Tuesday.



Gary G. Gremillion
Warden

Tallulah Correctional Center for Youth

APPENDIX C

TCCY Policy No. AM-01-003

Mission

**DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS
TALLULAH CORRECTIONAL CENTER FOR YOUTH
TRAINING FACILITY PROCEDURES**

Policy No. AM-01-003

Pages: 4

Subject: Mission

Effective Date: December 10, 1997

References: La. R.S. 15:905

Department Regulations:

B-02-006 - Louisiana Intensive Training and Education Program (Lite)

C-05-001 - Activity Reports - Unusual Occurrence Reports - Operational Units

ACA Standards:

3-JTS-1A-03

1-JBC-1A-03

3-JTS-1A-04

1-JBC-1A-05

3-JTS-1A-05

3-JTS-1A-06

3-JTS-1A-08

Applicability: All Staff of Tallulah Correctional Center for Youth.

Purpose: To establish the Warden's goals for the facility in keeping with the overall mission of the Department of Public Safety and Corrections and the facility as an integral part of the correctional system.

Policy: The philosophy of Tallulah Correctional Center for Youth is to provide for the safe, humane care of the Offenders entrusted to our care, in an environment designed to educate, rehabilitate, and facilitate change. This philosophy recognizes that the public safety and the safety of the staff are primary and must be ensured.

A. Mission

In keeping with the overall mission of the Louisiana Department of Public Safety and Corrections and the Secretary's policy of developing cost-effective alternatives to traditional incarceration without serious threat to public safety, the mission of the Tallulah Correctional Center for Youth is as follows:

1. To provide for the custody, control, care and treatment of adjudicated offenders through enforcement of laws and implementation of programs designed to ensure the safety of the public, staff and offenders and to reintegrate offender into society;

TCCY TFP AM-01-003

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Mission

December 10, 1997

2. To accept into custody only those offenders who have been adjudicated in accordance with Louisiana Revised Statute 15:905 and the Louisiana Children's Code. Only offenders who are adjudicated delinquent and/or who are found guilty of offenses that would be crimes if committed by an adult will reside at TCCY;
3. To accept into custody those offenders who have been found appropriate for the Louisiana Intensive Training and Education Program in accordance with Department Regulation B-02-006;
4. To accept into custody other juvenile offenders who have not been found to be appropriate for the LITE program but who are otherwise appropriate for assignment to TCCY;
5. To provide educational services for offenders confined to the facility;
6. To provide group and individual counseling, and substance abuse educational counseling for offenders confined to the facility;
7. To provide the above services in a short-term, paramilitary, boot-camp type atmosphere designed to instill into the participants a respect for authority, a strong work ethic, and acceptable social skills;
8. To provide the above services in a manner which provides for the safety and well-being of staff and offenders;
9. To facilitate the release of offenders through appropriate interaction with the courts, Division of Youth Services, and the offender's family in accordance with department regulations.

B. Goals and Performance Indicators

1. It is the goal of the administration to maintain compliance with all applicable federal and state laws, DPS&C Department Regulations, and ACA Standards for Juvenile Training Schools and Juvenile Boot Camps. To this end, corresponding TCCY Training Facility Procedures will be implemented, reviewed at least annually, and updated as necessary. All staff will be trained in the use of and required to be familiar with all TCCY policies to facilitate effective implementation.
2. It is the goal of the administration that no staff member while on duty or offender while in our custody shall receive a significant injury, that staff members shall not be subjected to assaults by offenders, and that offenders shall not be subjected to abuse by staff members or other offenders. To measure our success in meeting this goal, statistics will be maintained in the following categories on a monthly basis and will be summarized and reviewed/revised by the

TCCY TFP AM-01-003

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Mission

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Warden at the end of each fiscal year according to Department Regulation C-05-001.

- Death by suicide;
 - Death by violence;
 - Offender on staff assaults with or without significant injury;
 - Offender on offender assaults with weapon with or without significant injury;
 - Offender on offender assaults without weapon with or without significant injury.
3. It is also the goal of the administration to maintain staffing for Security, Medical, and Mental Health in accordance with the Federal Consent Decree. Statistics on consent decree violations will be maintained on a monthly basis and will be reviewed by the Warden.
4. To assist in meeting TCCY's overall mission and other goals and objectives not stated in 1. above, performance indicators and/or other measurable data in at least the following areas will be compiled on a monthly basis and reported to DPS&C Headquarters in accordance with Department Regulation C-05-001:

A. Activity Data

1. Offender Disciplinary Activity;
2. Education (including academic, vocational, library services, TABE and CAT Test administrations, GED accomplishments, and Special Education Services);
3. Communicable Diseases (including HIV/AIDS and Tuberculosis);
4. Midnight Breakdown Count for the last day of the month;
5. Transfers from TCCY;
6. Summary of ARPs (Administrative Remedy Procedure);
7. Duty Status;
8. Positions vacant over 30 days;
9. FMLA Leave Report;
10. Health Care Services Workload Indicators (including basic health care providers, optometry/ophthalmology, dental, individual mental health contacts, substance abuse group, sex offender group, admits to the infirmary, off-site health services, pharmacy, and lab/x-ray);
11. Various security personnel information;
12. Aggravated Sex Offenses;
13. Major and/or Minor Disturbances;
14. Escapes and Apprehensions.

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Mission
December 10, 1997

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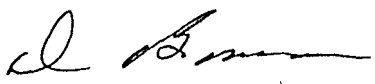
B. Operational Data

1. Major problems and plans for solving them;
2. Changes or developments in operations;
3. Appraisal of offender and staff morale;

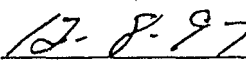
C. Other Data

1. Project Zero Tolerance activities and action plans;
2. Consent Decree Violations.

5. The mission, goals, philosophies, and purposes of TCCY will be reviewed at least annually and updated as needed.



Warden



Date New/Revised

This Training Facility Procedure supersedes TCCY SOP AM-01-003 dated March 13, 1995.

Tallulah Correctional Center for Youth

APPENDIX D

TYYC Policy No. IO-01-032

Project Zero Tolerance

**DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS
TALLULAH CORRECTIONAL CENTER FOR YOUTH
TRAINING FACILITY PROCEDURES**

Policy No: IO-01-032

Pages: 3

Subject: Project Zero Tolerance

Effective Date: September 29, 1997

References:

Department Regulations:

A-01-004 - Project Zero Tolerance

C-02-006 - Use of Force

To Whom This Policy Applies: All Staff of Tallulah Correctional Center for Youth

Purpose: To establish the facility policy for a balanced approach to reducing violence as a formal and sanctioned program of the Department of Public Safety and Corrections.

Policy: It is the policy of this institution to address offender on offender, staff on offender, and offender on staff acts of violence, including developing a work force that is trained and committed to the resolution of conflict with the minimum use of force and to instill problem-solving skills that are meaningful alternatives to violence.

Procedures:

- A. A letter will be sent to all approved visitors in regards to Project Zero Tolerance.
- B. The Project Zero Tolerance Poster will be posted in all areas occupied by offenders (living areas, school, dining hall, and infirmary). Employee posters will be posted on employee bulletin boards, in roll-call areas, and living areas. (Memos from the DPS&C Secretary shall be posted on all bulletin boards).
- C. All offender phones will be checked by the shift captain on the first and fifteenth day of each month by calling the hot line number. The investigators will check all offender phones to include the dedicated phones on the seventh and twenty-eighth day of each month. Any discrepancies will be reported to the Chief of Security immediately.
- D. There will be a sign containing P.Z.T. information posted at the front gate of the facility.
- E. The Program Director will discuss alternatives to violence to all offenders during their reception to the facility and information relative to P.Z.T. shall also be included in the offender handbook.

TCCY TFP IO-01-032
Project Zero Tolerance

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- F. Every allegation of unnecessary or excessive use of force - Staff on Offender; Allegation of Violence Involving Offender on Staff; Use of Chemical and/or Mechanical Restraint; Offender on Offender Incident Involving Injury as Determined by Medical Staff - will be reported to the project team within 24 hours of when it comes to the attention of the Warden - even if the institutional review is not complete. The credible allegations will be reported to the court. Information concerning these allegations will be included in the weekly monitoring report. Every use of chemical agents will be documented and reported to the Warden in accordance with Department Regulation C-02-006. Every allegation of abuse, corporal punishment, placement of restraints when force was used that resulted in an injury, use of chemical agents, and/or offender on staff abuse that resulted in injury will be sent to the investigators office. The investigator will fax this information to the P.Z.T. Office within 24 hours of notification. Additional reporting will continue in accordance with D.O.C. Reg. C-02-006. The investigators will complete the report within ten days of notification. Every use of force to include the use of chemical agents will be documented and reported to the Warden.
1. Immediate medical attention will be provided to every offender involved in the use of force regardless of case to include the officer if he/she is injured as a result of the confrontation.
- G. The Assistant Wardens will be notified of all allegations of abuse, placement of restraints when force was used that resulted in an injury, use of chemical munitions, and/or offender on staff abuse that resulted in injury. The Assistant Warden of Programs will contact the legal guardian to notify the family of the current situation. Additional reporting will continue in accordance with Department Of Corrections Regulation C-02-006.
1. All employees who have any knowledge of allegations of abuse, excessive force, corporal punishment, placement of restraints when force was used that resulted in an injury, use of chemical munitions, and/or offender on staff abuse that resulted in injury is obligated to report this information to the Warden of Programs immediately.
- H. A formal schedule and monitoring system will mandate daily rounds (unannounced visits) to be made by the Administrative and Clinical Staff to housing and program areas. Rounds will be made to each housing area on a random basis between the hours of 4:30 p.m and 6:00 a.m. each day of the week. Each program area will be visited daily. Any deviation from the schedule must be noted on an Unusual Occurrence Report and forwarded to the Warden. A copy will be submitted to the Project Team. There is no specific time requirements on

TCCY TFP IO-01-032
Project Zero Tolerance

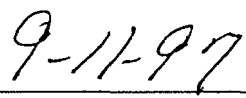
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Saturdays, Sundays and holidays. Visits will include housing and program areas. The Phase I Major will insure compliance of rounds being made.

1. The staff member making the rounds shall sign the log bog in each area that is visited to include writing "P.Z.T. Round".
 2. The staff member making rounds will document such on the PZT Rounds data sheet. Documentation utilizing this form will reflect the date, staff members' signature, offender name, JIRMS#, housing assignment, PZT complaint, other complaints, and comments or action taken. Copies of the PZT form will be distributed to the Warden, Deputy Warden, Assistant Warden/Programs, and Assistant Warden/Security. Complaints not specifically under the heading of PZT will be addressed by administrative department heads.
- J. Each employee that has direct contact with offenders will be trained in Defense Tactics to insure swift and appropriate resolution to dangerous situations. It is directed to minimize the circumstances that involve using force, as well as effectively gaining control by using the minimum amount of force in those situations, which should reduce (or not cause) injury to staff/offenders.
- K. Every offender will have unlimited access to the P.Z.T. Hotline. This include the phones in the housing areas and the dedicated phones located in both Phase I and II Infirmarys.
- L. This policy shall be reviewed annually and updated as needed.



Warden



Date New/Revised

Attachment: PZT Rounds Data Sheet

TCCY

PZT Rounds

Date: ____ / ____ / ____

Staff Member: _____

[illegible]

cc: PZT Rounds File

Warden

Deputy Warden

Asst Warden for Programs

Asst Warden for Security

Tallulah Correctional Center for Youth

Appendix E

References

Puritz, P., & Scali, M. (1998). *Beyond the Walls: Improving Conditions of Confinement for Youth in Custody*. Technical Report: US Department of Justice, Office of Justice Programs, Office of Juvenile Justice and Delinquency Prevention. NCJ #164727

Van Voorhis, P., Braswell, M., & Lester, D. (1997). *Correctional Counseling and Rehabilitation Third Edition* Anderson Publishing Co. Cincinnati, OH.