



A Joint Committee of the Ohio General Assembly

LONDON CORRECTIONAL INSTITUTION

INSPECTION REPORT

NOVEMBER 2020

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**REPORT ON THE INSPECTION & EVALUATION OF
LONDON CORRECTIONAL INSTITUTION**

| | |
|--------------------------------|---|
| Dates of Inspection: | November 17, 2020 |
| Type of Inspection: | Announced |
| CIIC Staff Present: | Travis Ricketts, Deputy Director, Remote Rachel Helbing, Senior Analyst, Remote Jeffrey Noble, Senior Analyst, In-Person Elijah Woodberry, Analyst, Report Coordinator, Remote |
| Facility Staff Present: | Warden Norm Robinson CIIC spoke with many additional staff throughout the course of the inspection. |

Institution Overview

London Correctional Institution (LoCI) is a medium security male prison, housing Level 1 (minimum) and Level 2 (medium) security offenders. The facility opened in 1924 and is located on 2,950 acres in London, Ohio. It is the oldest male institution in Ohio. In FY 2019, LoCI was approved for a budget of \$41,991,102.

The rated capacity for LoCI is 1,950. As of November 17, 2020, the institution housed 2,011 offenders.

Demographically, 43.8% of offenders were classified as black, 52.0% as white, and 4.2% as another race. The youngest offender was listed as 18 years of age and the oldest was listed as 88 years of age. The average offender age was 42 years. As of November 17, 2020, LoCI employed 347 total staff, of which 227 are security staff.

The institution scored 100% compliance on the March 2019 ACA audit for 58 applicable, mandatory standards, and 99.3% on the 442 applicable, non-mandatory standards. The areas of non-compliance were for unencumbered space in offender cells and ceiling clearance in some dayrooms. Both were granted waivers from ACA. In its February 2019 full internal management audit, LoCI was 100% compliant on the 57 applicable, mandatory standards and 98.8% compliant on the 427 applicable, non-mandatory standards. Of the Ohio Standards, the facility was 89.8% compliant on the 98 applicable standards. The areas of non-compliance were related to institutional rounds, response to grievances, use of evidence based treatment for chronic illness offenders, HIV patient guidelines, Monthly Contract Monitoring Checklists, specialty patients, management of offenders on hunger strike, treatment of chronic hepatitis C, personal property records, and training contractors and volunteers.

FACILITY RATINGS

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

| | 2017 | 2020 |
|--|-------------------------------|-------------------------------|
| SAFETY & SECURITY | GOOD | GOOD |
| <i>Violence Outcome Measures</i> | <i>Good</i> | <i>Good</i> |
| <i>Use of Force</i> | <i>Acceptable</i> | <i>Good</i> |
| <i>Control of Illegal Substances</i> | <i>In Need of Improvement</i> | <i>Good</i> |
| <i>Offender Perception of Safety</i> | <i>Exceptional</i> | <i>Exceptional</i> |
| <i>Unit Security Management</i> | <i>Exceptional</i> | <i>Good</i> |
| <i>Institutional Security Management</i> | <i>Exceptional</i> | <i>Good</i> |
| <i>Prison Rape Elimination Act</i> | <i>Good</i> | <i>Good</i> |
| HEALTH & WELLBEING | GOOD | GOOD |
| <i>Unit Conditions</i> | <i>Good</i> | <i>Exceptional</i> |
| <i>Medical Services</i> | <i>Good</i> | <i>Good</i> |
| <i>Mental Health Services</i> | <i>Good</i> | <i>Acceptable</i> |
| <i>Recovery Services</i> | <i>Good</i> | <i>Good</i> |
| <i>Food Services</i> | <i>Acceptable</i> | <i>Good</i> |
| <i>Recreation</i> | <i>Good</i> | <i>Good</i> |
| FAIR TREATMENT | GOOD | ACCEPTABLE |
| <i>Staff/Offender Interactions</i> | <i>Good</i> | <i>Good</i> |
| <i>Inmate Grievance Procedure</i> | <i>Good</i> | <i>In Need of Improvement</i> |
| <i>Offender Discipline</i> | <i>Exceptional</i> | <i>Good</i> |
| <i>Transitional Programming Unit (TPU)</i> | <i>Good</i> | - |
| <i>Limited Privilege Housing</i> | <i>Good</i> | - |
| REHABILITATION & REENTRY | GOOD | GOOD |
| <i>Reentry Planning</i> | <i>Good</i> | <i>Good</i> |
| <i>Rehabilitative Programming</i> | <i>Good</i> | <i>Good</i> |
| <i>Family Engagement & Community Connections</i> | <i>In Need of Improvement</i> | <i>Acceptable</i> |
| <i>Academic Programming</i> | <i>Good</i> | <i>Good</i> |
| <i>Library Services</i> | <i>Good</i> | <i>Good</i> |
| <i>Vocational & Work Skill Development</i> | <i>Good</i> | <i>Acceptable</i> |
| <i>Ohio Penal Industries (OPI)</i> | <i>Exceptional</i> | <i>Good</i> |
| FISCAL ACCOUNTABILITY | ACCEPTABLE | GOOD |
| <i>Fiscal Wellness</i> | <i>In Need of Improvement</i> | <i>Good</i> |
| <i>Environmental Sustainability</i> | <i>Good</i> | <i>Exceptional</i> |
| <i>Staff Management</i> | <i>Good</i> | <i>Acceptable</i> |

INSPECTION OVERVIEW

Preparation for the inspection of London Correctional Institution took place in the week prior to site visitation. The most recent inspection of the facility, completed in 2017, was reviewed to identify areas of previous concern or praise. The CIIC database of concerns received from offenders, constituents, and staff was analyzed for topics of frequent concern. CIIC members and staff were notified of the upcoming inspection and invited to attend, if schedules allowed.

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

“With the goal of reduced impact on facility operations, the in-person inspection process was adapted to be completed by a single CIIC staff member within a half day. CIIC recognizes that DRC facilities have staff in cohorts for portions of the prisons to reduce the potential for cross-contamination. The in-person inspector works with facility staff to identify the appropriate cohort that will allow for the fulfillment of observational requirements. Additional interviews will be conducted via phone call with one of three CIIC remote inspectors.”

The day of inspection, Tuesday, November 17, 2020, consisted of an opening meeting between in-person Senior Analyst Noble and Warden Robinson followed by a facility tour. Areas inspected included Areas inspected included C1 and C2 Housing units, TPU, the OPI Garment Shop, the Food Service Area and the training room. A close-out meeting was held by CIIC Senior Analyst Noble and Warden Robinson prior to departure. Each remote inspector completed telephone interviews with staff in various positions. Facility staff were welcoming to the CIIC inspectors, and their adaptability to the hybridized inspection process was greatly appreciated.

An initial inspection report draft was provided to Warden Robinson and his staff on Friday, January 29, 2021 as an opportunity to review and notify CIIC staff of any discrepancies. A teleconference meeting between CIIC and facility staff was held on Thursday, February 4, 2021 to finalize the inspection report draft.

SAFETY & SECURITY: GOOD

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

| SAFETY & SECURITY | 2017 GOOD | 2020 GOOD |
|-----------------------------------|------------------------|--------------|
| Violence Outcome Measures | Good | Good |
| Use of Force | Acceptable | Good |
| Control of Illegal Substances | In Need of Improvement | Good |
| Offender Perception of Safety | Exceptional | Exceptional |
| Unit Security Management | Exceptional | Good |
| Institutional Security Management | Exceptional | Good |
| Prison Rape Elimination Act | Good | Good |

KEY FINDINGS

Assaults have continually decreased between CY 2017-2019.

VIOLENCE OUTCOME MEASURES: GOOD

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

Assaults

Total Assaults CY 2017 – CY 2019

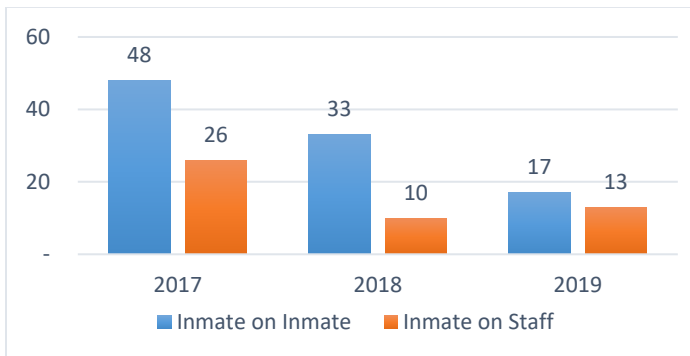


Figure 1: 2019 assault data is preliminary data given by ODRC.

| | 2018 | % | 2019 | % |
|------------------------------------|------|-------|------|-------|
| Significant O¹/O | 4 | -50.0 | 2 | -50.0 |
| Significant O/S | 0 | - | 0 | - |

Assault data provided by the Significant Incident Summary Report calculates assaults, at any given institution, at a higher threshold than DRC. Assaults are defined as causing a major interruption in services at the institution.

The rate of offender disciplinary convictions for assaultive offenses increased by 29.8% during CY 2018 in comparison to CY 2017 and increased by 5.6% from 2018 to 2019. LOCI has had 482 to date in 2020.

¹ O/O signifies Offender-on-offender assaults. Whereas O/S signifies offender-on-staff assaults.

Comparator Inmate-on-Inmate and Inmate-on-Staff Assaults

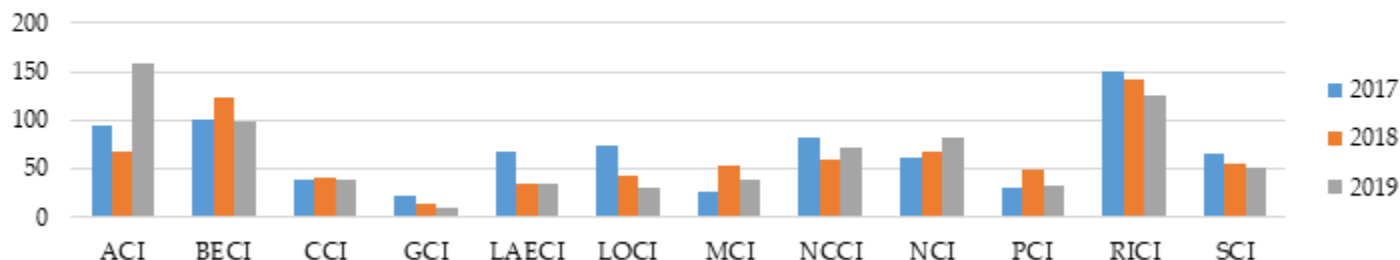
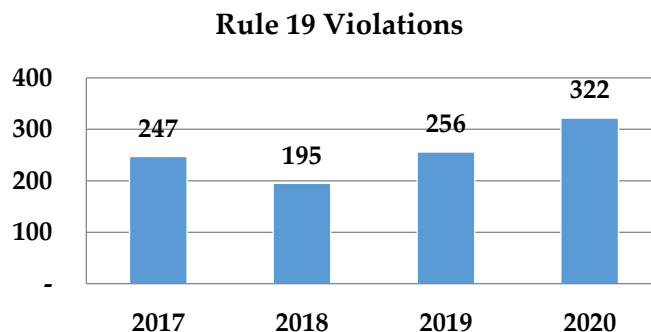


Figure 2: The total combined "inmate on inmate" and "staff on inmate" assaults are graphed above for data collected from 2017-2018 for all DRC level 1 and 2 institutions.

Fights

Fights¹ are documented via RIB convictions for Rule 19 (fight) violations. The rate of Rule 19 convictions decreased 21% from 2017 to 2018 and increased 31.3% from 2018 to 2019. LoCI has had 322 Rule 19 convictions to date in 2020.



Homicides

There have been no homicides during the past three years (2017 to date).

Disturbances²

LoCI has not reported any disturbances since the last inspection.

USE OF FORCE: GOOD

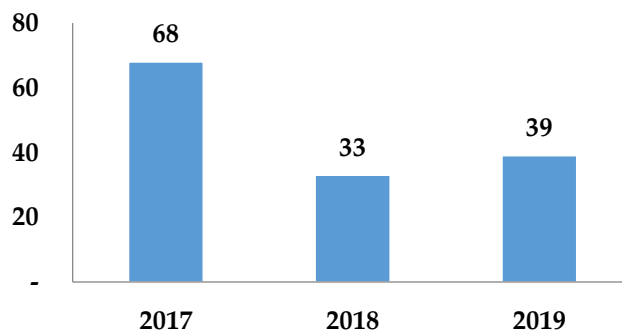
Evaluation of Use of Force (UoF) focuses on the number of uses of force at the institution as well as an evaluation of a random sample of completed Use of Force reports.

Incident Caseload

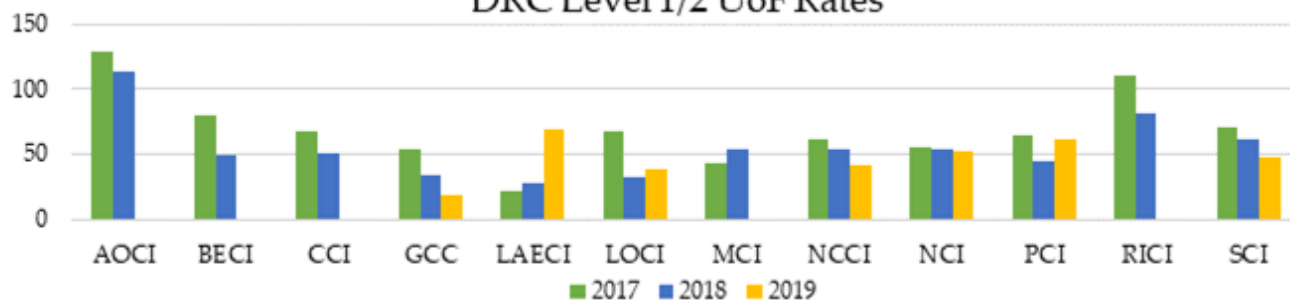
From CY 2017 (68) to CY2018 (33), the facility decreased use of force incidents by 51.5%. From CY 2018 (33) to CY2019 (39) there was an 18.2% increase in use of force incidents.

| LoCI UoF | 2018 | % | 2019 | % |
|----------|------|-------|------|-------|
| | 33 | -51.2 | 39 | +18.2 |

LoCI UoF



DRC Level 1/2 UoF Rates



Procedural Accountability

Video documentation was available on 5/5 incidents reviewed. Staff appropriately referred use of force incidents to a use of force committee/ investigator. Officer statements reviewed were generally thorough and clearly stated directives given prior to force. The required documentation was completed and included

in the packets. Medical examinations were completed in the appropriate time frames.

Application of Force

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

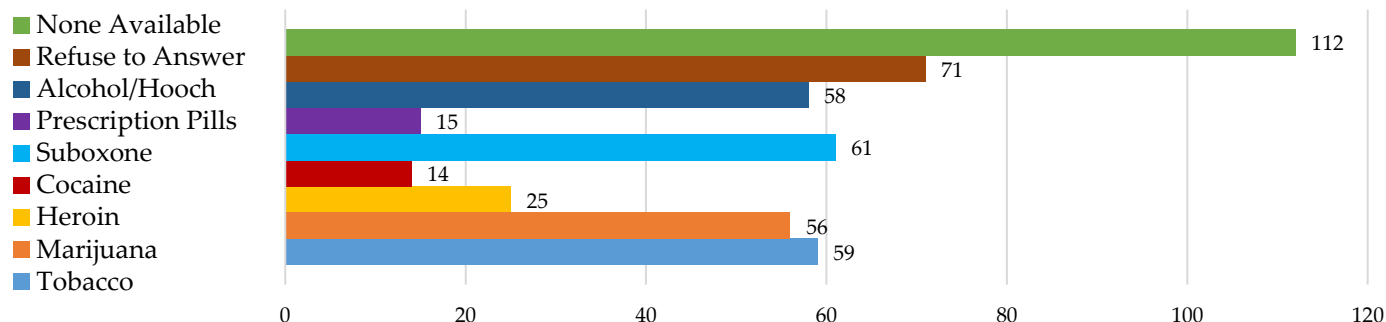
CONTROL OF ILLEGAL SUBSTANCES: GOOD

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

| Random Drug Testing | 2017 | | 2018 | | 2019 | |
|-------------------------------|--------------|-------------|--------------|-------------|--------------|-------------|
| | # Tested | % Positive | # Tested | % Positive | # Tested | % Positive |
| Allen-Oakwood | 1,187 | 4.5% | 968 | 7.7% | 826 | 3.3% |
| Belmont | 1,733 | 5.2% | 1,712 | 2.2% | 1,724 | 5.1% |
| Chillicothe | 1,931 | 5.5% | 261 | 1.1% | 1,784 | 6.0% |
| Franklin Medical | 461 | 6.5% | 590 | 8.3% | 466 | 5.4% |
| Grafton | 1,317 | 0.2% | 1,169 | 0.3% | 1,045 | 0.2% |
| Lake Eerie | 1,210 | 1.7% | 1,213 | 2.0% | 1,123 | 6.3% |
| London | 1,318 | 5.8% | 1,535 | 6.1% | 1,419 | 4.7% |
| Marion | 1,570 | 2.9% | 1,634 | 2.9% | 1,431 | 3.2% |
| Northeast | 1,755 | 12.4% | 1,734 | 9.1% | 1,431 | 8.9% |
| Noble | 1,694 | 1.2% | 1,586 | 2.7% | 1,579 | 3.9% |
| Pickaway | 1,437 | 6.9% | 1,259 | 5.3% | 1,336 | 12.4% |
| Richland | 1,645 | 8.6% | 1,671 | 7.4% | 1,529 | 5.9% |
| Southeast | 1,217 | 1.0% | 1,076 | 0.7% | 1,053 | 1.5% |
| Level 1/2 Average | | 4.8% | | 4.3% | | 5.1% |
| DRC Average | | 4.9% | | 5.5% | | 5.3% |
| Program Drug Testing | | | | | | |
| London | 251 | 3.2% | 511 | 3.8% | 654 | 8.4% |
| For Cause Drug Testing | | | | | | |
| London | 1212 | 27.6% | 165 | 43.0% | 274 | 42.0% |

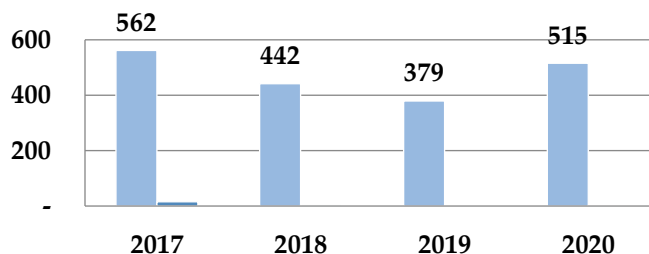
Offender Survey Question(s)

Q. 32 What type of prohibited substances are available at this institution?



The institution has made several modifications at the facility to combat drug conveyance issues. The facility has experienced a serious increase in the conveyance of synthetic cannabinoid (K2) in recent years. It is generally made by using a plant based material such as tobacco, leaves, etc. and spraying harmful chemicals on it. Prison conveyance methods include spraying a letter, card, or page in a book, having it sent in and smoked or eaten. Chemicals generally used can be bug spray or other intoxicating chemicals. Its use causes severe psychological episodes.

Rule 39 (Drug Possession/Usage) Violations



OFFENDER PERCEPTION OF SAFETY: EXCEPTIONAL

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

| Offender Survey Question(s) | Safe or Neutral | Total Number of Respondents | Change from Previous Inspection |
|--|-----------------|-----------------------------|---------------------------------|
| Q. 18 Do you feel safe/neutral/unsafe from other inmates here? | 90.7% | N=258 | +1.6% ³ |

The institution had 10 offenders in Limited Privilege Housing for refusal to lock. Offenders refuse to lock many times due to threats, debts, concerns for safety, etc. An offender can request protective control, but a risk to their must be substantiated.

UNIT SECURITY MANAGEMENT: GOOD

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

Officer Rounds

Officers were consistent in documenting security rounds in the requisite 30 minute, staggered intervals. Supervisors were monitoring to ensure compliance.

Cell/Bunk Searches (Shakedowns)

Housing unit officers are required to search offenders' bunks/cells for contraband, including illegal drugs and weapons. Officers were consistent for the documentation of required shakedowns. The facility had a monitoring process in place and officers were completing the required searches per departmental policy.

INSTITUTIONAL SECURITY MANAGEMENT: GOOD

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

Executive Staff Rounds

Executive staff members⁶ are consistent in making the required rounds in housing units based on a review of employee sign-in logs. The executive rounds have been divided by cohort during the coronavirus concerns.

STG Management

As of November 2020, there were 230 STG-affiliated offenders, which was 11% of the institutional population. The number of STG-affiliated offenders was higher in comparison to the number on the 2017 inspection, which was 246 offenders.

Cell⁴/Bunk⁵ Security Check

Bunk security check visibility and property control were excellent at this institution. It was obvious that oversight of this process was good.

Security Classification

Unit staff are required to conduct reviews of offenders' security classification to ensure proper institutional placement. There were two overdue security classification reviews unaccounted for on the day of the inspection, one offender was out to court and another was in the hospital.

The rate of Rule 17 (unauthorized group activity) convictions⁷ decreased from 20 incidents in 2017 to one in 2019. The Rule 17 convictions were 20 in 2017, 14 in 2018, and one in 2019. There have been two convictions to date in 2020.

A review of STG committee meetings for the past six months indicated meetings are being held and included the required staff. There were only 12 overdue security threat group classification reviews, which are done at the monthly STG meetings.

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

Escapes

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

PRISON RAPE ELIMINATION ACT (PREA): GOOD

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

PREA Management

The February 2019 Internal Management Audit found one Ohio PREA related standards in non-compliance relating to volunteer training documentation.

The facility met 36 standards and exceeded eight standards on its March 2019 PREA audit.⁸ There were no concerns noted on the inspection.

PREA notification alarms were tested throughout the facility and worked appropriately.

Offender Education and Awareness

PREA posters, with information for offenders on reporting of sexual assaults, were posted in all housing units.

| Offender Survey Question(s) | Yes | Total Number of Respondents | Change from Previous Inspection |
|---|-------|-----------------------------|---------------------------------|
| Q. 27 Do you know how to report sexual harassment or abuse? | 87.0% | N=254 | +3.3% |

Investigations/Allegations

Staff reported there were nine PREA cases in CY 2019, of which all were allegations against another offender.

| | 2017 | 2018 | 2019 | |
|--|---|---|---|--|
| Total Alleged Incidents | 11 | 8 | 9 | |
| Outcomes | 3 unsubstantiated 3 substantiated 4 unfounded | 0 unsubstantiated 2 substantiated 6 unfounded | 2 unsubstantiated 2 substantiated 5 unfounded | |
| Offender Survey Question(s) | Yes | Total Number of Respondents | | Change from Previous Inspection |
| <i>Q. 19 Have you been harassed or threatened by other inmates here?</i> | 24.9% | N=253 | | +2.1 |
| <i>Q. 21 Have you ever been abused by inmates here?</i> | 7.7% | N=260 | | +0.9% |
| <i>Q. 24 Have you been harassed or threatened by staff here?</i> | 45.8% | N=253 | | -18.1% |
| <i>Q. 25 Have you ever been abused by staff here?</i> | 13.8% | N=253 | | -7.4% |

HEALTH & WELLBEING: GOOD

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

| HEALTH & WELLBEING | 2017 GOOD | 2020 GOOD |
|-------------------------------|----------------------|----------------------|
| <i>Unit Conditions</i> | <i>Good</i> | <i>Exceptional</i> |
| <i>Medical Services</i> | <i>Good</i> | <i>Good</i> |
| <i>Mental Health Services</i> | <i>Good</i> | <i>Acceptable</i> |
| <i>Recovery Services</i> | <i>Good</i> | <i>Good</i> |
| <i>Food Services</i> | <i>Acceptable</i> | <i>Good</i> |
| <i>Recreation</i> | <i>Good</i> | <i>Good</i> |

KEY FINDINGS

The CIIC inspector found the facilities to be exceptionally clean and well-organized.

Staffing levels were a noted concern in medical.

There were two vacancies for psychologists in Mental Health at the time of inspection.

The institution has a Recovery Supportive Dorm, which was found to be innovative by CIIC staff.

The fellowship IN-2-WORK program is provided for workers to participate in, from which they can receive higher hourly payments.

UNIT CONDITIONS: EXCEPTIONAL

Evaluation of unit conditions consists of direct observation of unit conditions on the main compound and the camp.

Main Compound

All dayrooms/common areas were exceptional or good based on the cleanliness of the floors and their overall appearance. The bunk conditions were also rated as good with no visible issues.

A few toilets were under repair as relayed by unit staff, and they stated that maintenance was aware.

All showers were in good to excellent condition. All the drinking fountains, ice machines, phones, and laundry facilities were operational. Cleaning materials matched the inventory and were appropriately secured.

MEDICAL SERVICES: GOOD

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

Facilities

The facility is reported to have sufficient space for staff to conduct clinical duties. Staff relayed that it would have been beneficial to have additional space during COVID-19, but there is sufficient space during normal

operation. The officer’s station is placed in the middle of the facility, which allows for exceptional visibility.

The sanitation practices have reportedly increased during COVID-19, to include high-touch areas and common areas on a high frequency. Porters sanitize in

between groups of offenders, to reduce cross-contamination of cohorts. Alcohol-based hand sanitizer is also now widely available.

Staffing

The facility appears to have a sufficient number of medical staff. The facility had one healthcare administrator, one assistant healthcare administrator, a quality improvement coordinator, two nurse practitioners, five licensed practical nurses, 11 registered nurses, one doctor, and two health information technicians. Additionally, there is a phlebotomist and an optometrist. Dental staff consists of three part time dentists, two full time hygienists, and a part time hygienist. There were two registered nurse vacancies at the time of the inspection. The HCA reported that they have never been able to fully staff second shift with nurses due to scheduling. A focus group of nurses most frequently cited staffing levels when discussing their daily challenges and cause for feeling unsupported by supervisors.

A focus group of nurses was held virtually and relayed the following takeaways. Staff felt that they provide quality care to offenders, work well as a team, and respond to emergencies quickly. Nurses were split when answering if they felt supported by supervisors. Nurses had concern with staffing levels and communication.

Quality

An Internal Management Audit was conducted February 2019 and found six Ohio standards related to medical services in need of improvement.

Medical staff relayed that they participate in quarterly interdisciplinary meetings, which is in compliance with DRC policy. The QIC is a part of patient satisfaction meetings quarterly, which is in compliance with DRC policy. Patient satisfaction surveys are also sent out on a continuous basis. There have been nine offender deaths from 2017-2019.

Sick Call & Chronic Care

Number of Offenders seen in Last Six Months

| | | | |
|------------------------------|-------|-------------------------|-------|
| <i>Nurse Sick Call</i> | 1,654 | <i>Doctor Sick Call</i> | 2,334 |
| <i>Chronic Care Caseload</i> | 876 | | |

| Offender Survey Question(s) | Satisfied or Neutral | Total Number of Respondents | Change from Previous Inspection |
|--|-----------------------------|------------------------------------|--|
| <i>Q.4 How satisfied are you with the quality of the care you get from the nurses?</i> | 67.5% | N=246 | +16.0% |
| <i>Q.4 How satisfied are you with the quality of the care you get from the Doctor/ALP?</i> | 61.7% | N=235 | +10.9% |
| Within 2 days | | | |
| <i>Q.2 On average, when do you see the nurse after filing a health service request (sick call slip)?</i> | 33.5% | N=224 | +2.9% |
| Yes | | | |
| <i>Q.3 If you are on the chronic care caseload, do you see medical regularly?</i> | 51.4% | N=140 | +0.1% |

MENTAL HEALTH SERVICES: ACCEPTABLE

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

Caseload

| | | | |
|-------------------------|-----|-----------------------------------|-----|
| Total | 363 | C1 / Seriously Mentally Ill (SMI) | 151 |
| Offenders on Medication | 185 | On Mandated Medications | 0 |

Access to Mental Health⁹

Three-hundred and forty kites have been processed in the last six months. Forty-seven referrals have been made to mental health for services. Office hours are offered to offenders from 8-11am and 12:30-3:30pm on weekdays, and other staff are available when mental health providers are not present on grounds. Staff in other departments are provided with information of offenders on the mental health caseload.

Staffing

Staffing levels included a mental health administrator, two psychologists, an APN-MH, two registered nurses, a social worker, two independently-licensed social workers, a quality improvement coordinator, and a health information technician. There were two vacancies at the time of the inspection for additional psychologists.

Programming

LoCI offers a small range of mental health programming for offenders on the caseload. Two

group programs were able to be offered by staff: Thinking for a Change and Cage Your Rage. Group sessions were suspended due to COVID-19 restrictions, but are planned to resume with decreased numbers of participants to allow for social distancing.

Suicide Attempts / Critical Incidents

There have been no completed suicides from 2017-2019. Four attempts were made and two instances of self-injurious behavior occurred. The facility routinely utilizes crisis intervention strategies to diffuse offender concerns. From 2017-2019, there have been 187 uses of constant watch and 124 uses of observation status.

Quality

A full Internal Management Audit was conducted in February 2019. While all standards were in compliance, the auditors relayed one concern relating to frequency of MHL contact with offenders.

| Offender Survey Question(s) | Satisfied or Neutral | Total Number of Respondents | Change from Previous Inspection |
|--|-----------------------------|------------------------------------|--|
| <i>Q.4 Overall, how satisfied are you with the quality of the care you get from Mental Health?</i> | 77.7% | N=139 | +6.5% |

RECOVERY SERVICES: GOOD

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

Facilities

The staff report they have sufficient space for staff to conduct clinical duties. There is a recovery-supportive dorm that houses 205 offenders that are enrolled in or awaiting programming.

Staffing

Staffing levels appear high and sufficient to provide recovery service programming. There were no staff vacancies at the time of the inspection. There were seven counselors and one supervisor. Nine offender aides are utilized to assist with programming. When COVID-19 restrictions are not in place, seven volunteers from the community are used to facilitate AA/NA programming.

Participation and Outreach¹⁰

Programming is currently being conducted one-on-one between participants and clinicians to allow for

social distancing. In the last six months 102 participants were served. LoCI recovery service department offers the Renaissance Intensive Outpatient Program and AA/NA meetings. LoCI reported 75 offenders are currently assessed, with 217 on the waitlist. The majority of individuals on the waitlist are housed in the recovery-supportive dorm, where they are engaged with a big brother and pre-treatment activities. When COVID-19 cohorting restrictions are not in place, the recovery service department does reach out to offenders who are found guilty of Rule 39's¹¹ for intervention programming. Staff reported 194 offenders attended open NA/AA meetings in 2017, 184 in 2018, and 171 in 2019.

Staff relayed multidisciplinary meetings occur quarterly through the QIC (Quality Improvement Committee) process which is within policy.¹²

| Offender Survey Question(s) | Yes | Total Number of Respondents | Change from Previous Inspection |
|---|-------|-----------------------------|---------------------------------|
| <i>Q.7 Do you feel you are able to get into Recovery Services Programs?</i> | 44.6% | N=139 | -2.6% |

FOOD SERVICES: GOOD

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

Dining Hall

The tables and the floor of the dining halls were clean and clear of debris. The serving lines were also clear of food particles. The area was rated as good.

Meal

The meal sampled by CIIC was rated as good. The portion sizes were sufficient and the quality of the main entrée was good. Temperatures were appropriate. The sampled meal was pizza, macaroni and cheese, salad and an apple.

Kitchen and Food Preparation Area

The kitchen floors were clear of any excess food particles and debris. At the time of inspection, two ovens were operational, but a bid for repair/replacement had just been awarded. Staff relayed that equipment is sanitized after every use and every twenty minutes when not in use. The preparation area is cleaned on a regular basis after each meal.

Offender Work Programs

Offenders earn \$18-22 in pay each month, with additional incentive pay possible. Additional incentives have been awarded during the COVID-19 pandemic. LoCI has piloted a fellowship program,

which allows offenders that graduate from the IN-2-WORK program through Aramark to earn minimum wage by taking on additional work duties.

Food Service Contract Staff

The food service contract staff consisted of 10 hourly workers, which is in compliance with contracted levels.

Loading Dock / Pest Control

The loading dock was clean and clear of debris. Staff relayed that the exterminator visits the facility monthly and as needed. An ongoing pest control issue is the presence of field mice from the nearby fields. Multiple methods of trapping are used.

Food Service Management and Oversight

In their most recent contract evaluation from the DRC in April 2020, LoCI received a compliance score of 99.0%. LoCI has consistently received high marks on these evaluations in the past year.

In their most recent health department inspection on March 5, 2020, the institution passed with 64/66 standards in compliance.

| Offender Survey Question(s) | Not Satisfied | Total Number of Respondents | Change from Previous Inspection |
|---|----------------------|------------------------------------|--|
| <i>Q.10 How satisfied are you with the food in the chow hall?</i> | 72.6% | N=259 | -16.0% |

RECREATION: GOOD

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

Facilities

Physical facilities¹³ appeared clean and were observed in use during the day of the inspection.

Activities

Offenders are offered a good variety of activities for recreation, including several organized intramural sport and tournaments. Overall, the recreation department offers a majority of recreation activities permitted, per policy, for Level ½ offenders. Movies are made accessible and are rotated frequently.¹⁴

The recreation department has a three music rooms and multiple bands. Participants may purchase approved instruments through vendors. Additionally, there is a leisure arts program in which

participants can order materials through Blick and other approved vendors and there is also a space provided for them to utilize materials. It was reported that LoCI has a woodworking shop.

Access

Currently, recreation permits one dorm to recreate on a rotating basis. Prior to COVID-19 restrictions, open recreation was provided so all units were allowed to recreate at once. Recreational activities are also available in dorms including board games, permitted weighted equipment, abdominal wheels and stationary bikes in some dorms.

| Offender Survey Question(s) | Satisfied or Neutral | Total number of respondents | Change from Previous Inspection |
|--|-----------------------------|------------------------------------|--|
| <i>Q. 8 How satisfied are you with recreation?</i> | 40.4% | N=260 | -18.0% |

FAIR TREATMENT: ACCEPTABLE

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

| FAIR TREATMENT | 2017 GOOD | 2020 ACCEPTABLE |
|--|----------------------|-------------------------------|
| <i>Staff/Offender Interactions</i> | <i>Good</i> | <i>Good</i> |
| <i>Inmate Grievance Procedure</i> | <i>Good</i> | <i>In Need of Improvement</i> |
| <i>Transitional Programming Unit (TPU)</i> | <i>Good</i> | <i>-</i> |
| <i>Limited Privilege Housing</i> | <i>Good</i> | <i>-</i> |
| <i>Offender Discipline</i> | <i>Exceptional</i> | <i>Good</i> |

KEY FINDINGS

An Ohio Standard, in their February Internal Management Audit, for the Inmate Grievance Procedure was out of compliance for not allowing time extensions.

Response times to informal complaints and grievances are not complaint with policy.

STAFF / OFFENDER INTERACTIONS: GOOD

Evaluation of staff/offender interactions is based on a survey of offenders and an analysis of grievance data.

| Offender Survey Question(s) | Yes | Total number of respondents | Change from Previous Inspection |
|---|------------|------------------------------------|--|
| <i>Q. 28 On most days, are your housing unit officers professional?</i> | 74.5% | N=251 | +14.1% |
| <i>Q. 29 On most days, are your housing unit officers helpful?</i> | 70.4% | N=250 | +21.1% |
| Yes | | | |
| <i>Q. 25 Have you ever been abused by staff here?</i> | 13.8% | N=253 | -7.4% |
| <i>Q. 26 If you have been abused by staff here, what type of abuse was it? Physical</i> | 82.8% | N=29 | +1.7% |
| <i>Q. 26 If you have been abused by staff here, what type of abuse was it? Sexual</i> | 17.2% | N=29 | -1.7% |

INMATE GRIEVANCE PROCEDURE (IGP): IN NEED OF IMPROVEMENT

Evaluation of the inmate grievance procedure¹⁵ includes an interview with the Inspector of Institutional Services, a review of a random sample of informal complaints and grievances, offender survey responses, and data analysis.

Access

The Inspector relayed that orientation is conducted with new staff and offenders to educate on the grievance procedure. The inspector stated that they make themselves available to offenders via office hours and during rounds. Inspector's report logs reflected inspector rounds being conducted in a variety of areas, to include food service, dormitories, and disciplinary housing. The inspector relayed that one offender was currently on grievance restriction, due to abuse of the system.

Informal Complaints

| Year | Filed | Closed | Average # of Days to Answer | Untimely |
|------|-------|--------|-----------------------------|-------------|
| 2018 | 1,767 | 1,778 | 32.58 | 250 (14.1%) |
| 2019 | 2,219 | 2,260 | 43.52 | 380 (17.1%) |

The Inspector relayed that they do contact staff prior to informal complaint response due date to monitor and ensure they are timely. It was reported that some complaints escalate to the grievance level without receiving a response, and must be returned to the staff member to address. A review of ten informal complaint responses for timeliness, investigation, and professionalism was completed. The responses all provided explanations of the materials reviewed and professionally addressed the complaints; although, some responses could have been more thorough.

Grievances

| Year | Filed | Closed | Average # of Days to Answer | Untimely |
|------|-------|--------|-----------------------------|-------------|
| 2018 | 658 | 509 | 111.12 | 178 (27.1%) |
| 2019 | 773 | 692 | 51.63 | 180 (23.3%) |

The Inspector relayed that the most frequent grievance topics are relating to healthcare, mail, and staff/offender relations. There was one offender grievance filed in the past year for staff retaliation that was substantiated. The Inspector gave a report and recommendation to the Warden to address with the staff member.

A review of ten grievance responses for timeliness, investigation, and professionalism was completed. The responses all provided explanations of the investigations or evidence reviewed and professionally addressed the complaints.

Oversight and Accountability

In the February 2019 Internal Management Audit, an Ohio Standard relating to the grievance procedure was found in non-compliance. Time

extensions for grievance responses were not being completed timely.

| Offender Survey Question(s) | Yes | Total Number of Respondents | Change from Previous Inspection |
|--|-------|-----------------------------|---------------------------------|
| Q.13 Do you know who the inspector is? | 56.4% | N=259 | +10.8% |
| Q.14 Are you able to get the following: Informal Complaints? | 82.4% | N=245 | +13.3% |
| Q.16 Have you ever felt that staff would not let you use the grievance procedure here? | 35.1% | N=248 | -20.5% |
| Q.15 Do you feel that the following are handled fairly at this institution: Informal Complaints? | 17.3% | N=168 | +10.6% |
| Q.15 Do you feel that the following are handled fairly at this institution: Grievances? | 14.3% | N=154 | +6.4% |

Offender survey respondents who reported that they had not used the grievance procedure noted that the top two reasons were, “No problems/reason to use” (93), closely followed by “Grievance procedure does not work” (86) and “Staff retaliation” (81).

OFFENDER DISCIPLINE: GOOD

Evaluation of offender discipline¹⁶ includes observation of Rules Infraction Board (RIB) hearings and a review of a random sample of closed RIB cases.

Caseload

The most frequent rule violations referred to RIB were Rules 19 (fighting) and 39 (possession/consumption), of the Inmate Rules of Conduct. Staff reported there were no issues with backlog.

There were 6,361 conduct reports submitted in 2019, which was an increase from 2018, which had 5,767. In 2019, 379 conduct reports were for drug or alcohol related offenses and 256 were for fighting or investigation of a fight.

Procedures

The RIB panel standard hearing procedures were discussed with the RIB chairman.¹⁷ Staff relayed that they review camera footage for conduct reports such as fights and assaults. They additionally will review kites, photographs, or medical exams, when appropriate for the case. Based on review, it appears the level of evidence is good. Review of 31 closed cases

found no procedural errors, which indicates that the oversight of RIB from the Warden’s level is good. The RIB panel did relay that cases are modified about once every year. The RIB chairperson also indicated that they have had one case returned from central office for rehearing in the last year.

The introduction of K2 into the facility was the biggest concern.

Due Process

In the 31 closed case reviews, two offenders were on the mental health caseload and were screened by mental health staff prior to the RIB hearing, per policy. No cases requested a witness in the cases reviewed. Six cases requested an appeal and were provided the paperwork.

The Inmate Rights Form was completed for all cases.¹⁸ Confidential information was not used in any of the

reviewed cases, but the process for the handling of confidential information was explained by the Rules Infractions Panel.

Sanctions

The progressive discipline process was explained by the Rules Infractions Board Chairperson and the reasons for not following progressive discipline on serious cases was explained. Discipline for first-time offenders appeared appropriate.

TPU Population

According to the TPU roster¹⁹, there were 43 offenders assigned to the TPU. There were 10 offenders charged with violations of Rule 23, "Refusal to accept an assignment or classification action" in TPU.

Restrictive housing offender's one hour recreation per day, while limited privilege housing offenders received two and a half hours out of cell time per day.

The units were quiet and organized. The cells in TPU and LPH were clean. Showers in each cell and were acceptable. No maintenance issues were observed or reported.

Programming/Activities

Mental Health staff conducts weekly rounds and evaluations of offenders. Medical staff are a consistent presence on the unit and conduct rounds, daily.

Medical services were provided in the unit if possible, some medical procedures required movement of the offenders to the medical facility.

Recreation consisted of indoor and outdoor areas. Each of the outside recreation areas consisted of a pull-up/dip workout station and a basketball rim. The outside recreation areas clean. Indoor recreation areas consisted of pull-up bars and dip equipment. Offenders have access to a bookcase for reading material and may kite the librarian for any needed resources.

Conditions

Overall, the common areas of the TPU were rated good. Each TPU cell has its own sink, shower, and toilet. Some cells had some writing on the walls but were generally clean and orderly. Staff relayed that there were no inoperable cells on the day of the inspection. Offenders reported that cell temperatures were adequate. The unit had a current construction project which is insulating the cells in the unit.²⁰

Critical Incidents

According to staff, Use of Forces occur about one time bi-monthly in TPU. The use of an alternative meal ("food loaf"), which is meant to be nutritional but used for improper behavior related to misuse of eating utensils and trays, was reported as being utilized about one to two times per year.

REHABILITATION & REENTRY: GOOD

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

| REHABILITATION & REENTRY | 2017 GOOD | 2020 GOOD |
|--|-------------------------------|----------------------|
| <i>Reentry Planning</i> | <i>Good</i> | <i>Good</i> |
| <i>Rehabilitative Programming</i> | <i>Good</i> | <i>Good</i> |
| <i>Family Engagement & Community Connections</i> | <i>In Need of Improvement</i> | <i>Acceptable</i> |
| <i>Academic Programming</i> | <i>Good</i> | <i>Good</i> |
| <i>Library Services</i> | <i>Good</i> | <i>Good</i> |
| <i>Vocational & Work Skill Development</i> | <i>Good</i> | <i>Acceptable</i> |
| <i>Ohio Penal Industries</i> | <i>Exceptional</i> | <i>Good</i> |

KEY FINDINGS

Vacancies in Reentry were a noted concern.

In 2019 the institution doubled the number of completions for *Thinking for a Change*.

Offender survey respondents expressed greater access to reentry information, despite the challenges of COVID-19 restrictions.

REENTRY PLANNING: GOOD

Evaluation of reentry planning²¹ includes interviews of staff, document review, and survey responses.

Staff Accountability

Unit staff consists of a Unit Management Administrator, five Unit Managers, nine Case Managers, and ten Sergeants. There were two vacancies at the time of inspection for a case manager and a sergeant. Case managers are expected to facilitate reentry approved programming, as well as meaningful activities.

Case managers have been facilitating services that would typically done by outside providers. Case managers communicate with outside agencies to gain resources and complete tasks needed for successful reentry.

Reentry Resources

Staff relayed they conduct job fairs each year to provide offenders with community contacts. Staff relayed that barriers for offenders to access purposeful activities and reentry programming at LoCI are the current restrictions in place due to COVID-19.

Staff attend reentry coalition meetings for local counties and restored citizen summits/symposiums. Many local agencies and employers would come into the facility to provide job skills and placement, though this is currently restricted due to COVID-19.

| Offender Survey Question(s) | Yes | Total Number of Respondents | Change from Previous Inspection |
|---|------------|------------------------------------|--|
| <i>Q.35 Do you know where you can find reentry information?</i> | 54.9% | N=257 | +11.3% |

REHABILITATIVE PROGRAMMING: GOOD

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

Unit-Based Programs

LoCI currently has four Reentry Approved programs able to be facilitated by unit staff at the time of this site visit. 2019 was the beginning of Decision Points being offered. Staff shared that 2019 produced two times the amount of Thinking for a Change completions as 2018. Additional reentry programs include: Money Smart, Cage Your Rage, Roots of Success, and TOPUCU. Meaningful programs led by staff or offenders (with staff supervision) are also offered to the population. LoCI has piloted programs on human trafficking awareness and childhood hunger.

| Program | Waitlist | Enrollment | 2019 Completions |
|------------------------------|-----------------|-------------------|-------------------------|
| <i>Thinking for a Change</i> | 270 | 41 | 40 |
| <i>Inside Out Dad</i> | 54 | 19 | 23 |
| <i>Victim Awareness</i> | 116 | 50 | 74 |
| <i>Decision Points</i> | 305 | 8 | 22 |

| Offender Survey Question(s) | Easy or Neutral | Total Number of Respondents | Change from Previous Inspection |
|--|------------------------|------------------------------------|--|
| <i>Q.37 How easy or difficult is it to get into the following activities in this prison? Unit Programs</i> | 49.8% | N=215 | +5.7% |
| | Yes | | |
| <i>Q.34 Have staff talked with you about what programs to take while incarcerated?</i> | 50.2% | N=255 | +8.6% |

FAMILY ENGAGEMENT & COMMUNITY CONNECTIONS: ACCEPTABLE

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

LoCI promotes offender communications with family, friends, and community through mail, email, phones, free envelopes, and programs. LoCI reported 152,529 community service hours for 2019. 2018 had 122,217 hours, and 2017 had 227,359. Volunteers are currently prohibited by COVID-19 restrictions. Staff relayed that activities to enhance community support have been Reentry Coalition Meetings and local agency involvement within the facility.

| Offender Survey Question(s) | Yes | Total Number of Respondents | Change from Previous Inspection |
|---|------------|------------------------------------|--|
| <i>Q.38 Have you had any problems with mail?</i> | 52.1% | N=259 | -14.1% |
| <i>Q. 39 Have you had any problems with telephones?</i> | 56.4% | N=257 | -4.7% |
| <i>Q.41 Have you had any problems with visitation?</i> | 48.8% | N=256 | +0.2% |

ACADEMIC PROGRAMMING: GOOD

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

LoCI education department consists of one principal, a counselor, an education specialist, eight academic instructors, four career tech instructors, twelve advanced job instructors and one intervention specialist. There are currently three vacancies in the education department for a GED instructor, High school English teacher and a career-tech HVAC instructor. The average ratio of student to academic and career/tech teachers is 20 to 1.

Education classrooms appeared to be in good condition. The LoCI education department has two CAIL Labs that are equipped with computers for GED and High School testing; all are reported to be working.

LoCI education department reported having forty-seven academic tutors trained to assist other offenders develop better learning skills. Due to COVID restrictions classes are not meeting but tutors are still available in their respective units.

LoCI education department offers Pre-GED, GED, ABLE, Literacy, Special Education, Title 1, career technical education/career enhancement program, and apprenticeship programs. Staff relayed that educational opportunities and material are provided to the offenders.

Currently, due to COVID restrictions formal classes are not being held at LoCI. To ensure that students are still able to access educational programming weekly packets are distributed to each student to be completed in their units. Instructors visit the units weekly on Wednesdays to answer questions students might have and students may kite instructors as well.

Reading room hours for the children’s reading room in visiting are not being reported on the Educational Monthly Report per policy²² and have not been reported in the past June Monthly Reports. In response, the facility reported that reading room hours are always open during visitation and they have not recorded hours on the Monthly Reports. LoCI offers offenders the opportunity to take the Pearson View GED test on the computer, or opt to take the HiSet test²³.

Although formal classroom education is currently not offered LoCI’s principal expressed tremendous gratitude for instructors and their work ethic during this time. There are future plans for students to have access to chromebooks which shall pilot a new distance learning program.

| Offender Survey Question(s) | Easy or Neutral | Total Number of Respondents | Change from Previous Inspection |
|--|-----------------|-----------------------------|---------------------------------|
| <i>Q. 37 How easy or difficult is it to get into the following activities in this prison? Academic Programming</i> | 51.6% | N=223 | -0.4% |

On-Site Observation

CIIC was unable to conduct an on-site observation due to no classes being held.

LIBRARY SERVICES: GOOD

Evaluation of literacy development focuses on data analysis, a document review, and library access.

Library Facilities

The library appeared organized and clean. The staff reported that the library currently has a seating capacity of approximately 139 offenders. Currently, the library is closed for entry but services are made virtual.

The total computers in the LoCI library is 12: four Lexus Nexus, six Word Processors, two Ohio Means Job computers along with six typewriters. Currently three of the typewriters are inoperable.

The library did reflect secondary educational, ethnic section materials and foreign language books in Spanish, and (some) in Mandarin, German and Hebrew.

The library advisory meeting was held on January 27, 2020 with staff in attendance such as the Librarian Committee Chair, the School Administrator, acting Deputy Warden of Special Services, Corrections Program Specialist, a security representative, Mental Health, and two offender representatives.

Library Access

The library schedule reflects two evening library sessions and weekend hours which is in compliance with departmental policy.²⁴ Due to COVID restrictions physical access to the library is closed but offenders may kite the Librarian for desired materials for reference requests and eBooks. Specific book requests are currently not being fulfilled. Offenders are also able to access

The staff reported that rounds are conducted every week to the Transitional Program Unit (restrictive housing and limited privilege housing unit), which is in compliance with DRC 57-EDU-02²⁵ and that offenders may request materials via kite.

The librarian reported that complaints received regarding the library was not having enough computers to do legal work. Additionally the Librarian relayed that improvements to the Reentry Resource Center would enhance library services. Recently, institutions replaced the M.U.S.C.L.E. guide with ReLink for reentry services. The Librarian reported some issues with access due to a no compatible firewall. This issue is reportedly having to do with the contract between ReLink and DRC.

VOCATIONAL & WORK SKILL DEVELOPMENT: ACCEPTABLE

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

| Program | Waitlist | Enrollment | 2019 Completions |
|--|-----------------|-------------------|-------------------------|
| <i>Barber</i> | 65 | 0 | 7 |
| <i>Web Design</i> | 140 | 0 | 8 |
| <i>Auto Mechanics</i> | 71 | 11 | 6 |
| <i>HVAC Maintenance</i> | 303 | 0 | 19 |
| <i>Business Admin- Franklin University</i> | 271 | 150 | 72 |

Programming

LoCI offers four vocational programs: Barber, Web Design, Auto Mechanics, and HVAC Maintenance with a combined 161 offenders enrolled. LoCI

currently has 51 apprentices enrolled in the following Apprenticeship programs: Animal Trainer, Dental Lab Tech, Janitor, Maintenance Building Repairer,

Material Coordinator, Recovery Operator and Stationary Engineer. LoCI offers advanced job training (college coursework) through Franklin University.

| Offender Survey Question(s) | Easy or Neutral | Total Number of Respondents | Change from Previous Inspection |
|---|-----------------|-----------------------------|---------------------------------|
| Q. 37 How easy or difficult is it to get into the following activities in this prison? Vocational Programming | 40.1% | N=227 | +9.7% |

OHIO PENAL INDUSTRIES: GOOD

*Evaluation of OPI includes an interview with the Shop Manager and a review of financial and employment data.*²⁶

Overview

LoCI offers four OPI shops; Garment Factory, Chair, Bag Factory and Dental Tech. The OPI area was clean. There were no facility maintenance concerns relayed by staff. Prior to COVID-19, LoCI had an OPI shop working on deflashing car parts for Honda Yamada. In March they made the switch to the garment, chair and bag factory. In FY 2019, LOCI’s OPI shops generated \$413,446 in revenue and in FY 2020 \$313,212 was generated in revenue.²⁷

OPI Managers relayed not doing letters of recommendation but workers may receive documentation confirming their work and performance at OPI.

Personnel

The OPI has six personnel assigned to supervise workers. There are 192 offender workers with 50 on a waitlist. Nineteen workers are in apprenticeships programs through the shop. Offenders who are interested in working in the OPI must complete an

application and be interviewed by staff to be selected. The average wage is \$0.23 to \$1.10 per hour. Offenders are searched by staff as they enter and leave the facility. Offenders also must pass through a metal detector.

Training

The first day consists of on the job training and orientation. Workers must complete tool and chemical training hours to work in the garment shop. New workers are assigned a trainer in their designated area. OPI reported that workers are learning how to sew cover sets, assemble chairs, and other mechanical skills. Those who work in the Dental Shop may receive a Dental Technician Certification.

Staff relayed that workers are able to receive documentation concerning their work in OPI upon release.

FISCAL ACCOUNTABILITY: GOOD

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

| FISCAL ACCOUNTABILITY | 2017 ACCEPTABLE | 2020 GOOD |
|-------------------------------------|-------------------------------|----------------------|
| <i>Fiscal Wellness</i> | <i>In Need of Improvement</i> | <i>Good</i> |
| <i>Environmental Sustainability</i> | <i>Good</i> | <i>Exceptional</i> |
| <i>Staff Management</i> | <i>Good</i> | <i>Acceptable</i> |

KEY FINDINGS

LoCI decreased all of their utility costs and usages for water, natural gas and electric.

The institution has implemented many energy cost and utilization saving methods.

At the time of inspection, there was a high vacancy rate for correctional officers and the National Guard was on site for additional assistance.

LoCI’s turnover ratio has steadily increased since FY2017.

FISCAL WELLNESS: GOOD

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

Budget Overview

The FY 2019 LoCI allocated budget increased by 10.2% from their FY 2018 budget.²⁸

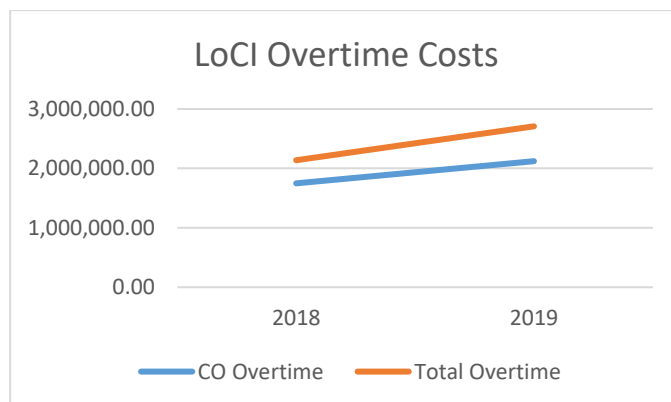
| | Amount |
|---------|---------------|
| 2018 FY | \$38,008,312 |
| 2019 FY | \$41,991,101 |

Fiscal Audits

In their most recent audit, LoCI was compliant in eight of nine applicable Ohio mandatory standards for an overall score of 88.9%.²⁹ In their most recent external fiscal audit dated January 2020, the External Auditor found no observations nor concerns.

Overtime Management

| | FY 2018 | FY 2019 |
|-----------------------|----------------|----------------|
| CO Overtime | 1,748,566 | 2,121,938 |
| Total Overtime | 2,137,405 | 2,708,201 |



Infrastructure

The following capital improvement requests were submitted for future consideration:³⁰

| Project | Amount |
|---------------------------------|---------------------|
| LoCI Chillers 1 & 2 Upgrade | \$1,585,000 |
| Walk-in Freezer Replacement | \$210,000 |
| Housing Unit Window Replacement | \$7,716,000 |
| LoCI Parking Lot Improvements | \$1,250,000 |
| | \$10,761,000 |

ENVIRONMENTAL SUSTAINABILITY: EXCEPTIONAL

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

Utility Conservation³¹

Overall, LoCI decreased their total utility costs by \$875,023 (-40.1%) in CY 2020. The most significant decrease was regarding their water costs which decreased by 53.1%. Both their natural gas and electric

costs decreased substantially as well.³² Additionally, LoCI decreased their utility usage for all utilities.

The CY 2019-20³³ utility consumption and costs comparisons are illustrated in the following chart:

| Energy Type | CY 2019 | CY 2020 | Change |
|--------------------------|--------------------|--------------------|---------------|
| Water (gal) | 102,909,528 gal | 40,015,410 gal | -61.1% |
| | \$1,163,148 | \$545,933 | -53.1% |
| Natural Gas (ccf) | 71,147 ccf | 42,967 ccf | -39.6% |
| | \$336,901 | \$199,376 | -40.8% |
| Electric (kwh) | 11,069,108 kwh | 9,020,155 kwh | -18.5% |
| | \$681,520 | \$561,237 | -17.6% |
| Total Costs | \$2,181,569 | \$1,306,546 | -40.1% |

Recycling

In FY 2019, recycling projects resulted in \$2,982 of revenue. LoCI has 23 offender re-claimers specifically trained in recycling but the program is currently non-operational due to COVID.

Sustainability Programs

No participants are currently enrolled in the Roots of Success³⁴ environmental literacy program, nor is there an offender waitlist. There were 15 completions in 2019.

Sustainability Audit

LoCI conducted a sustainability audit which outlined additional energy conservation and waste reduction initiatives from FY 2019. The institution has implemented a composting operation, and have installed new windows and LED lighting throughout the institution. The LED lighting project is projected to be completed by the end of calendar year 2020.

STAFF MANAGEMENT: ACCEPTABLE

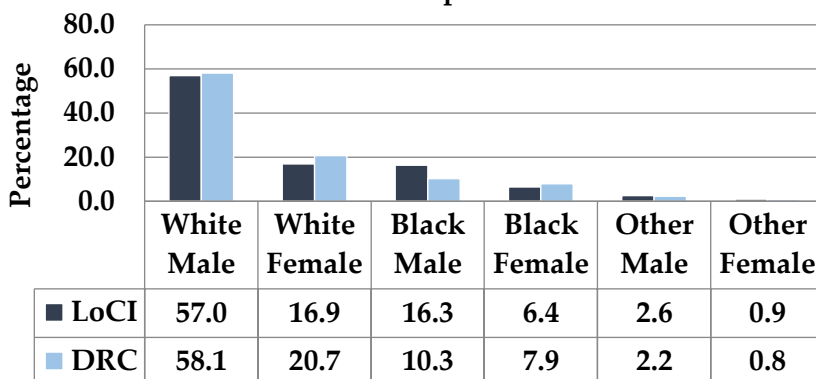
Evaluation of staff management includes a data review and staff interviews regarding overtime management, turnover ratio, morale, training, and evaluations.

Staff Demographics

As of November 2020,³⁵ LoCI had 344 total staff including 189 correctional officers (54.9%). Of the total staff, 75.9% were male and 24.1% were female. Additionally, 73.8% were classified as white, 22.7% were classified as black, and 3.5% were classified as individuals of another race.

As of November 2020, the offender-to-officer ratio at LoCI was 9.4-to-1 which is slightly higher than the DRC ratio of 6.1-to-1.³⁶

Staff Breakdown Comparison as of November 2020



Workplace Environment

CIIC interviewed 10 correctional officers who provided the following insight regarding the LoCI workplace environment: Most officers rated both staff and offender safety as “Average” on a 5-point scale. Some feedback on how to make the facility safer hiring more staff and COVID-related concerns.

- CPR/First Aid: 97.1%
- Defense Tactics: 91.9%
- E-Learning: 99.1%
- OC-Spray: 100%
- Firearms: 97.4%
- PREA: 99.1%

Staff morale was rated as “Low,” which staff attributed to the COVID and staffing levels and quality.

Staff are offered appropriate PPE equipment such as gloves, and masks. Equipment such as gowns, face shields and n-95 masks are made available to those who may interact with positive offenders. Hand sanitizer and gloves are also available throughout the facility.

Turnover Ratio

| | LoCI Total Separations | LoCI Rate | Total State Institution Separations | State Institution Rate |
|---------|------------------------|-----------|-------------------------------------|------------------------|
| FY 2017 | 54 | 14.0 | 1,283 | 11.8 |
| FY 2018 | 62 | 16.4 | 1,325 | 12.1 |
| FY 2019 | 79 | 21.5 | 1,437 | 13.1 |

Evaluations

In CY 2019, LoCI staff completed 100% of their 259 performance evaluations.

Vacancies

On the day of the inspection, LoCI reported 62 total vacancies. Of the total vacancies, 40 are for a correctional officer positions.

Training³⁷

The FY 2019 LoCI mandated training completion rates³⁸ consisted of the following:

Recruiting and Retention Initiatives

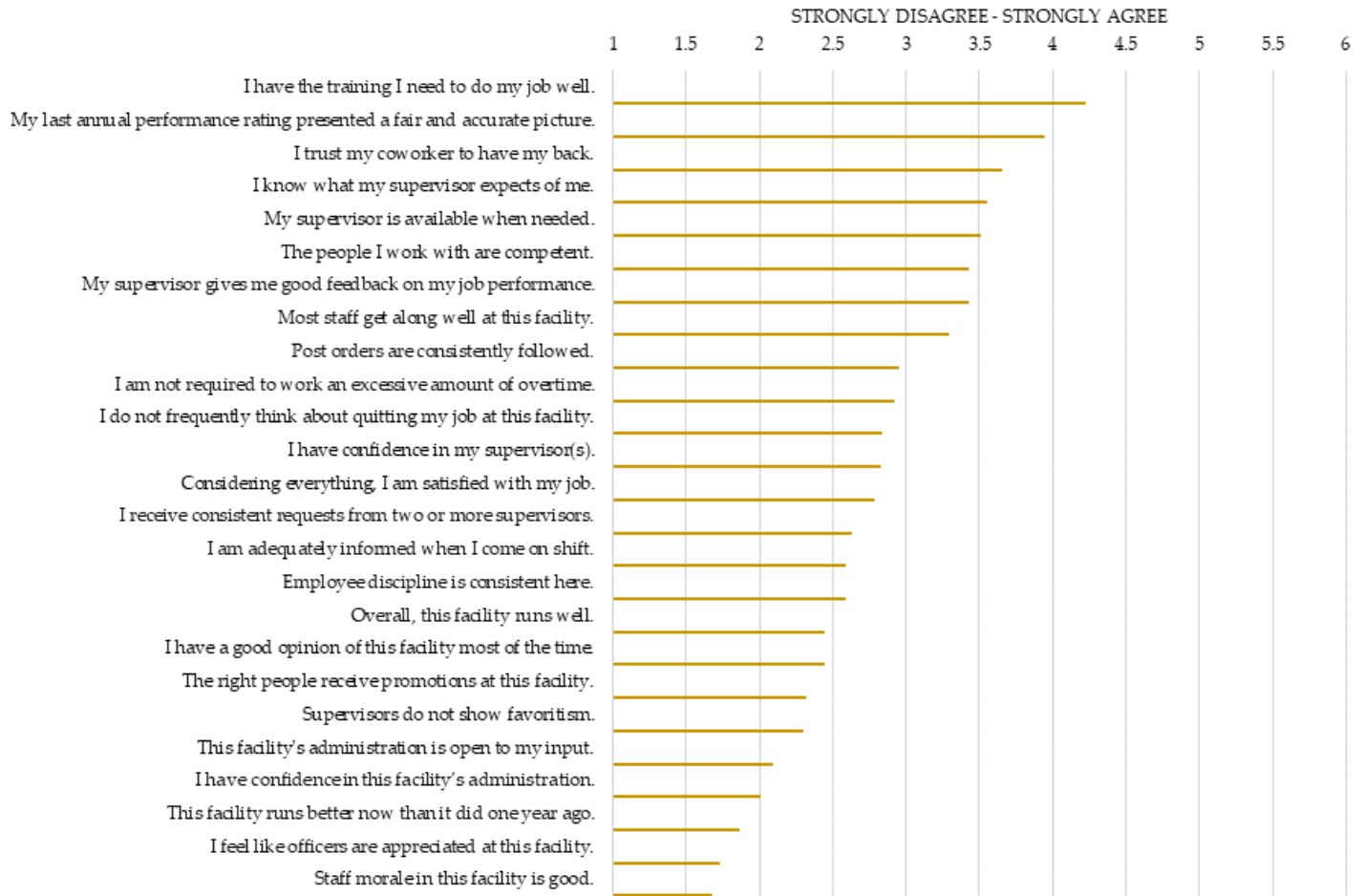
According to staff, LoCI recruiting initiatives includes attending job fairs, colleges, and vocational

trade schools to recruit new employees. Staff expressed that new recruits face challenges with adjusting to the correctional environment. Currently, in lieu of academy training, new recruits

are given On the Job Training (OJT) after attending a virtual 16-day New Employee Orientation via Microsoft Teams.

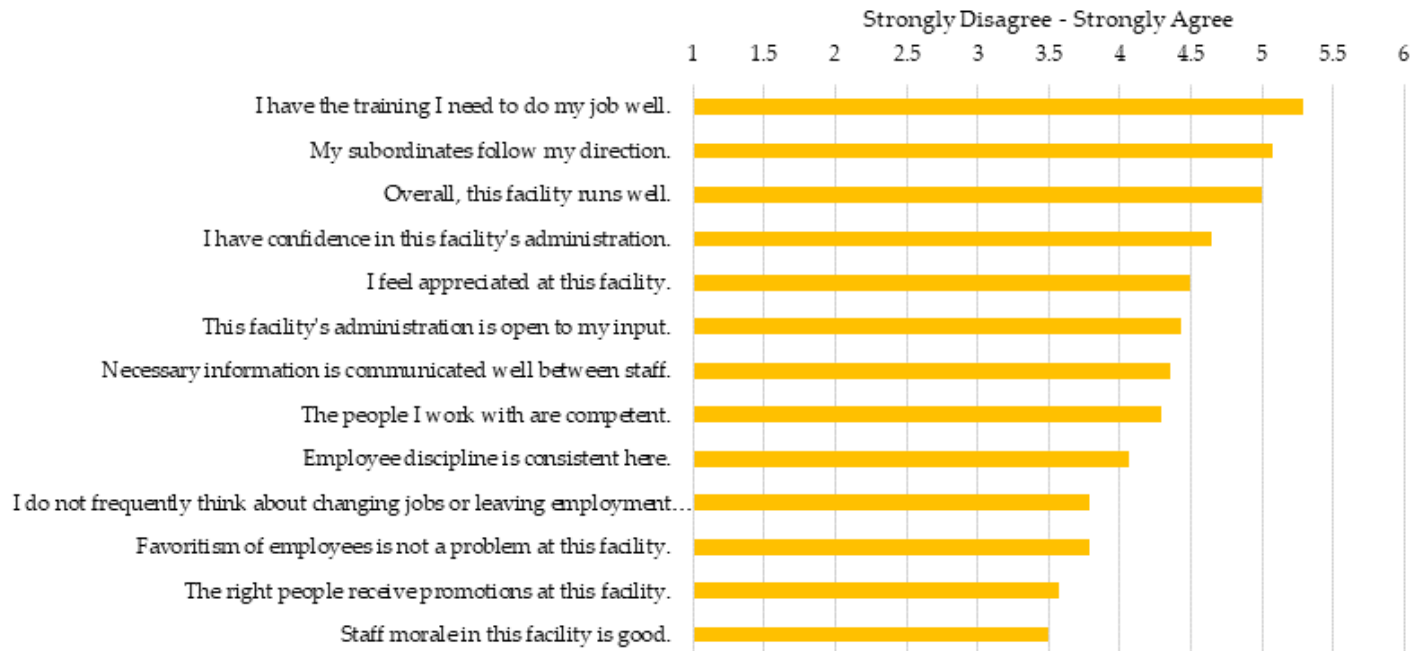
Correctional Officer Survey Results:

CIIC received 56 responses back from LoCI correctional officers which represents a sample size of 29.6% of total officers. The survey responses were mostly negative and indicate that officers have some concerns regarding their work environment.³⁹



Supervisor Survey Results:

CIIC received 14 survey responses from LoCI Supervisors. Although the supervisor survey responses were mostly positive, they also relayed a few concerns.



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

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

³ At the last inspection of LoCI in 2017 over 350+ survey responses were recorded. During this 2020 inspection, about 270 offender survey responses were recorded.

⁴ During the inspection, a random selection of cells in each unit are checked for common cell security issues such as: obstruction of windows, material in locks, inappropriate pictures, clotheslines, and graffiti.

⁵ During the inspection, bunk areas are checked to identify if offenders are hanging items to block officers' direct observation.

⁶ Per DRC policy 50-PAM-02, "Each housing unit, including the Transitional Program Unit, shall be visited by the managing officer and/or deputy warden weekly." In addition, "The unit management chief (UMC) and Major shall visit all inmate living areas, at a minimum, on a bi-weekly basis. The Transitional Program Unit/s are visited weekly by the Major. " Visibility of leadership is important in the correctional environment. It indicates they are aware of the conditions within their facility, and it also serves to boost the morale of staff and offenders.

⁷ RIB convictions for Rule 17 (unauthorized group activity) violations do not capture total gang activity in an institution, as gang activity likely occurs that is not captured by staff supervision and/or documented via a conduct report and RIB conviction.

⁸PREA Audit: Auditor's Summary Report Adult Prisons and Jails. Accessed at https://drc.ohio.gov/Portals/0/LoCI%20PREA%20Report%205_11_19.pdf

⁹ Access to mental health staff is evaluated based on several factors: (1) time period between offender submission of a mental health service request form and appointment with mental health staff; (2) time period between referral and appointment with the psychologist or psychiatrist; (3) response times to kites and informal complaint forms; and (4) current backlogs.

¹⁰ Each offender is screened using an assessment tool for the need for addiction services, and is assigned a number associated with a recovery services level. This number indicates the degree to which offenders are in need of addiction services. Offenders are scored from zero to three; zero indicating no need of services, to three indicating chronic need for addiction services. This number is determined through completion of a need for services assessment that gives an overall score resulting in the assignment to one of the recovery services levels. Offenders who score either two or three are most in need of treatment; thus, they should be prioritized for programming.

¹¹ AR 5120-9-06 defines Rule 39 as unauthorized possession, manufacture, or consumption of drugs or any intoxicating substance.

¹² In accordance with DRC 70-RCV-05, the Quality Improvement Committee shall review quality improvement activities to include utilization review, peer review, clinical review, and credentialing.

¹³ Indoor recreation facilities consist of a gymnasium a weight cage, multipurpose room, handball court and three music rooms. Outdoor facilities consist of a softball field with surrounding walking track, a handball court and horse shoe pit.

¹⁴ The department plays 16 movies weekly on four DVD players throughout the institution. Movies are rotated almost daily.

¹⁵ Pursuant to Section 103.73 of the Ohio Revised Code, the CIIC is required to evaluate the inmate grievance procedure at each state correctional institution. The inmate grievance procedure is a three-step process by which offenders can document and report concerns to multiple levels of DRC staff.

¹⁶ Offenders charged with a rule infraction are given a conduct report (also known as a ticket). All conduct reports are first heard by a hearing officer; if the offense is a minor offense, the hearing officer may dispose of it himself. More serious offenses must be referred to the RIB, which is a two-person panel that conducts a formal hearing, including witness testimony and evidence.

¹⁷ Appropriate procedures includes checking to ensure that the offender had received a copy of the conduct report, checked the Inmate Rights Form, read the conduct report, offered the opportunity for an offender to give his testimony, had the

offender leave for deliberation, reviewed evidence and discussed the case with the other panel member, informed the offender of the decision, and offered the opportunity to appeal.

¹⁸ The Inmate Rights Form asks whether the offender waives the 24 hour notice, the presence of the charging official at the hearing, and the presence of any witnesses. The form also asks the staff completing the form whether he or she believes that the offender needs staff assistance.

¹⁹ The roster tracks offenders by disciplinary status, rule violation, the date that the offender came into the TPU unit, mental health status, and STG status. All of this is important information for ensuring the orderly management the population.

²⁰ Cell security issues would include offenders attempting to block cell windows or cell door windows, STG related graffiti, attempting to jam the locks or place material in the cuff-ports, or excessive clotheslines or towels on the floor.

²¹ Reentry planning requires pervasive attention to individualized details from the first day of incarceration through the post-release period. Effective reentry planning is crucial for a successful reintegration into society. The inspection considers the amount and types of offender access to unit programs and purposeful activities, offender contact with local community representatives, and staff accountability related to reentry processes and unit life.

²² DRC 76-VIS-04 states that reading room coordinators shall submit a monthly report to the Ohio Central School System Literacy Coordinator using the Education Monthly Report Form (DRC2311).

²³ The HiSet is a paper test, which slightly differs from the GED test but, results in a high school equivalency certificate.

²⁴ DRC 58-LIB-01 states that library services shall be available to the offender population daily to include evenings and weekends, which includes all satellite library locations.

²⁵ DRC 57-EDU-02 states to ensure the accessibility of education staff and continuity of services, a library staff member shall visit each special population housing unit at least weekly with the area's logbook signed for accountability.

²⁶ Information provided reflects statistics given by the OPI Chair, Garment and Bag Shop.

²⁷ CIIC Inspection Documentation: *London Correctional Institution*, November 17, 2020.

²⁸ The FY 2019 allocated budget for LoCI is \$47,555,463.63 compared to \$43,153,527.41 for FY 2018.

²⁹ Department of Rehabilitation and Correction Office of Administration Bureau of Internal Audits, London Correctional Institution, Report of Audit for Period. All Local Funds: December 1, 2017 through August 30, 2019. Audit conducted September 9, 2019 through September 11, 2019. Report Finalized: January 30, 2020.

³⁰ The capital improvement requests were submitted for FY 2021 through FY 2022.

³¹ The DRC established a goal for each institution to reduce its annual utility costs by five percent. Natural gas, water and electricity are the primary utilities targeted for reduction of use. The costs and usage totals provided by LoCI staff does not include the most recent gas and water bill.

³² Natural gas costs decreased by 40.8% and electric costs decreased by 17.6%.

³³ CY2020 numbers are from January to September of 2020.

³⁴ According to the Roots of Success website, the Roots of Success is an activity-based curriculum that is facilitated by an instructor and taught in a classroom setting. The purpose of the program is to prepare offenders adults to become professionals and leaders who can access good green jobs upon release by improving environmental and social conditions in their institutions.

³⁵ DRC Monthly Fact Sheet, November 2020 <https://www.drc.ohio.gov/Portals/0/November%202020.pdf>

³⁶ DRC Monthly Fact Sheet, November 2020 <https://www.drc.ohio.gov/Portals/0/November%202020.pdf>

³⁷ DRC required 40 hours of in-service training for custody staff (all non-clerical/support designated staff) and 16 hours in-service training for non-custody (clerical/support staff). According to DRC policy, 39-TRN-02 ("In-Service Training"), the prisons are mandated by the CTA to ensure custody staff receives annual re-certification training on the following topics: firearms, unarmed self-defense, CPR/First Aid, and in-service training. Institutions are only mandated to take CPR every other year. These topics are derived from Administrative Regulations, Legislative/Judicial Requirements, ACA Standards, DRC policies, and/or other Department Training Advisory Council recommendations. The goal of each institution is for all required staff to complete 100% of their required training by the end of each fiscal year.

³⁸ Reasons for non-completion include: being off work, COVID restrictions, not being required to report and TWP status.

³⁹ London Correctional Institution Correctional Institution, staff survey results, November 2020.