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INTRODUCTION

The Low Security Federal Prison in Forrest City, Arkansas, has posted notices stating that inspectors from the American Correctional Association (ACA) are expected, from July 12-14, 2011. The posting invites inmates to provide "information relevant to this agency's compliance" at least 10 business days before the visit.

This document was prepared between Friday, June 24, 2011, and Monday, June 27, 2011, on a primitive computer program called Trulincs. The "cut and paste" function does not exist. Due to document length limitations, this document is actually 10 separate documents stitched together to make one. As a result, the organization admittedly leaves somewhat to be desired.

The purpose of this document is not to prevent this prison from being accredited. On the contrary, the intent is to assist in causing this prison's policies and practices to be upgraded to comply with the standards that ACA, and the public, expect from a correctional institution. The taxpayers who support this facility are entitled to honest, competent administration, and reasonably fair value for the money expended.

The items are organized in the same order that the standards are organized. However, sometimes more than one standard is grouped together, in the interests of brevity.

1. ADMINISTRATION AND MANAGEMENT

Section C: Personnel

4-4052 - Certain staffing not to run more than 10% short as a matter of practice. See also 4-4050, staffing requirements.

The staffing for persons working directly with inmates should not exceed 10% over an 18 month period, according to the standard. In fact, Correctional Officers (COs) often work both sides of a floor, thus giving a ratio of about 1 CO to 340 inmates.

Some employees are virtual "ghost employees." Shon Foreman was up until recently the assigned counselor for Marianna-D, where Oscar Stilley (Stilley) resides. He would show up at his office in the housing unit perhaps 3-4 days per month, on average. The rest of the time he was either absent or hiding out somewhere on the compound. He has since transferred to another US Department of Justice-Bureau of Prisons, (DOJ-BOP) facility. He was never disciplined for his perennial absenteeism and abject laziness, to the knowledge of Stilley.

SOLUTIONS: Low staffing ratios are perfectly acceptable if there is a valid reason for it. However, on information and belief, the cash savings resulting from inadequate staffing are effectively looted by certain personnel. Waste and misallocation of resources is unquestionably rampant upon this compound. If the prison questions either of these statements, it should 1) provide Stilley and the American Correctional Association (ACA) with documentation, pursuant to the federal Freedom of Information Act, showing the use of appropriated and other funds, to demonstrate a good faith effort to adequately staff, and 2) consider suggestions for greater efficiencies that would reduce unnecessary expenditures in other areas.

Priorities for the use of personnel should be set and followed, with the purpose of effectuating the ACA standards with respect to staffing of persons working directly with inmates.

4-4069 - See the 2010 Standards Supplement (Supp.) at page 45. Employees should set an example for prisoners and thereby command their respect.

As will be shown hereinafter, the operation of the prison is routinely dishonest and corrupt. It is scarcely possible to teach prisoners to be honest while administration and employees alike operate in a pervasively dishonest and corrupt manner.

SOLUTIONS: Train and condition employees to be scrupulously honest and fair in all their interactions with inmates. Identify and prohibit the common violations of law and inmate legal rights.

2. PHYSICAL PLANT

Section C: Inmate housing

4-4132 - 25 feet of unencumbered space per occupant. See also 4-4129, population not to exceed facility's rated bed capacity; and 4-4127, which limits management unit size to 500 inmates; and 4-4135, which provides that dayrooms must provide a minimum of 35 square feet per inmate.

The prison has units designed to meet the space guidelines of the BOP Program Statements, such that a 2 man cell has 80 square feet, with at least 50 square feet unencumbered. But the main TV Room has also been converted to living space. There, inmates have "cells" of about 42 square feet, just over half the required space. Unencumbered space is far less than half the 25 square feet required by the standard.

Since the main TV room is used for housing, the remaining rooms don't come close to providing 35 square feet for each inmate actually using the dayrooms. Often inmates are discouraged from using the rooms because of competition for space. This competition is a significant source of tension between inmates and groups of inmates.

SOLUTIONS: The fundamental reason that this prison is overcrowded is the recidivism rate, along with defiance of rules for home release, halfway house, and other lawful means of relieving overcrowding. Some inmates are denied jail credit despite undeniable intent on the part of both the federal and state sentencing judges to have federal and state sentences run concurrent to each other.

This prison should study other correctional facilities and programs that have low recidivism, and adopt their successful policies and practices. The BOP should publish detailed statistics on recidivism, by facility, criminal history, crime of conviction, and as many other parameters as possible. The BOP should reward low recidivism and deter high recidivism with negative consequences for administrative personnel.

4-4137 - One toilet for each 12 inmates.

Up to half of these may be urinals. This prison has 6 toilets and 5 urinals per housing unit. That's enough under the standard to support a population of 132.

Virtually all resources in the prison are sized such that the resource is fully utilized when the housing units hold the rated capacity of inmates. Overcrowding strains every other resource upon which inmates depend.

The maintenance of toilets is just short of atrocious. Toilets have been physically missing for as long as 8 months at a stretch. When dividers between urinals break or fail for any reason, they are typically just hauled outside. The flushing apparatus' are altogether too flimsy for such constant hard use, and thus fail on a regular basis. Then it often takes a long time to get it fixed. Sometimes urinal flush valves will stick open, so that water simply runs 24/7. There is no logical reason that the inadequate plumbing hardware couldn't be switched out for heavy duty equipment suitable to the task.

The toilets, showers, and sinks are often cleaned at busy times with little concern about the effect on inmates.

SOLUTIONS: Reduce overcrowding. Schedule cleaning for low-use times of the day, and clean only part of the facilities at a time, to the extent practicable. Use the best available plumbing supplies and parts, and make sure that defective equipment is promptly repaired or replaced.

4-4138 - One washbasin for each 12 occupants.

We have 12 washbasins, which by ACA standards logically supports a maximum of 144 inmates. By each washbasin there are 3 telltale screw holes, where the liquid soap dispensers have been taken out; more on that later.

4-4139 - One shower for each 8 inmates. See also 4-4341, showers at least 3 times a week, ideally daily.

We have 15 showers, which under ACA standards supports 120 inmates. We would be happy with these showers if they were managed for our use and benefit, rather than as a weapon for group punishment and harassment.

The prison was constructed with metal shower doors. When those rusted they were taken down and replaced with cheap, weak shower curtains. When they tear up we are expected to tape them up with masking tape, which of course is a poor material for shower curtain repair. We just got new shower curtains, after the stock of sufferable shower curtains got down to nearly nothing, but we still have to use patched shower curtains.

To make matters worse, the counselors take down all but 2 of the shower curtains in the morning. On Wednesday, June 1, 2011, I showed our counselor, Ms. Jackson, where our handbook says that all showers are to be available, among other times, from 6:15 AM to 9:15 AM, she angrily told me to get out of her office. She continued her practice of leaving only 2-4 shower curtains up during those hours, depending upon her mood.

The showers function and look like someone got the hardware out of a plumbing salvage yard. There are 4 different kinds of shower heads. There are two kinds of brass shower heads, each of which work well. The straight hole shower heads are a mixed bag, some adequate and some not. The 4th shower head type is effectively a mister. It is rarely used, and even more rarely used by an inmate who has suffered a shower under it. Some of the hardware is defective, causing a persistent water hammer sound when the shower is used.

SOLUTIONS: Go through all the housing units, installing good brass shower heads in each shower. Fix the showers that have water hammer problems. Replace the shower doors with higher quality, more durable doors. Install shelves, towel racks, and clothes hooks so inmates don't have to bring a chair to have a place for their clothes and towels.

Section D: Environmental Conditions

4-4147-1 - Natural light with at least 3 square feet of transparent glazing. See also 4-4149, requiring that each day room have at least 12 square feet of transparent glazing. [New construction only.]

Windows of inmate housing, especially on the 2nd floor, are rarely cleaned. The main TV room windows are inaccessible because the room is used for overflow housing. The windows also have steel bars, which are unnecessary given the security level of the prison. This provides an opportunity for constructive employment, and also comports with the intent of the standard -- namely, to provide inmates with a clear view of the outside.

Special Housing Unit (SHU) cells have woven plastic screens on the window cut light transmission to about 1/4 of normal light transmission. These windows could be made compliant with the standard by simply removing the screens and keeping them clean.

SOLUTIONS: Admittedly this is a standard for new construction, but it gives the prison a chance to demonstrate a willingness to follow the spirit as well as the letter of the standards. Reduce overcrowding, remove all the plastic screens, remove bars from the windows, and keep all windows clean and unobstructed.

4-4152 - Circulation of air - 10 cubic feet of air per minute per occupant, pollutants removed.

The prison has clothes washers and dryers in the housing units. However, the dryer exhaust is not vented outside. Repeated requests that the dryer exhaust be vented outside have been

rebuffed. The humidity causes serious black mold problems, and periodically causes serious health problems for a significant percentage of the inmates, including undersigned.

Air conditioning cooling coils don't have adequate filtration. Therefore they get filthy, but are rarely cleaned. On information and belief they were recently cleaned in anticipation of the effort to obtain ACA certification.

The prison has state of the art equipment for cleaning vents but rarely uses it. Furthermore, in SHU most of the vents into the rooms are welded shut. It is impossible to clean that ductwork. The air quality in SHU is altogether unacceptable.

SOLUTIONS: Vent the dryers to the outside with a switch that senses airflow and turns on a power assist exhaust fan. Thoroughly clean air conditioning coils periodically. Install and regularly clean High Efficiency Particulate Arrestor (HEPA) filtration on all heat exchange coils used to heat or cool air in prison buildings. Cut off the welded covers on ductwork in SHU, and replace them with covers fastened by security screws that can be removed for cleaning.

4-4153 - Temperatures and humidity appropriate for comfort, mechanically controlled.

The air conditioning thermostatic control system has not worked correctly for at least 4 years. Temperatures often fall into the 50s Fahrenheit, in the units. COs sometimes bring sweaters, jackets, and portable electric heaters to work in the summertime. Prison employees sometimes open doors in order to let cold air out and warm air in. Last summer, the commissary ran out of thermal underwear during peak cooling season. Inmates slept under 2 blankets, in thermal underwear, and sometimes also with a full set of clothes, in order to stay warm.

SOLUTIONS: Put qualified inmates in charge of maintenance of the thermostatic control system, giving them a reasonable percentage of the electricity savings. This administration has demonstrated its utter incompetence and complete inability to fix what ought to be a relatively simple problem.

3. INSTITUTIONAL OPERATIONS

Section A: Security and control

4-4193 - Control of contraband, searches to be conducted only as necessary to control contraband or recover stolen or missing items.

On or about Wednesday, June 21, 2011, the duty CO became angry with the inmates in the TV room because some of them were talking and making noise during count. He ejected everyone from the room, and went through the lockers, taking whatever he decided to take. From undersigned he took a fourth of a container of coffee creamer, an empty container used to put laundry detergent in the dirty laundry, and some condiments stored in empty ice cream containers.

The creamer was not subject to confiscation by any rule whatsoever. There was no basis under ACA standards for any rule to allow the confiscation of the other items. Yet numerous items are routinely confiscated, but only when COs, counselors, or other personnel get angry. Often, no attempt is made to hide the fact that the searches and seizures are meant to retaliate or punish for

matters having no relationship to the confiscated material, and often without any relationship to the inmate from whom the items are taken.

SOLUTION: Fire the warden and replace him with someone committed to the rule of law. Redraft the Inmate Handbook to 1) expressly repudiate the right to conduct searches for unauthorized ulterior motives, 2) List as contraband only such items as are genuinely a substantial threat to the legitimate interests of the prison. Train COs and other employees that fault is individual. In the example above, the CO should have written up formal accusations of one or 2 of the most egregious offenders, with an announcement that individuals talking during count will be found out and punished.

3. INSTITUTIONAL OPERATIONS

Section B: Safety and Emergency Procedures

4-4212 - [Mandatory] Fire and safety standards. See also 4-4124, also mandatory, which requires conformity with local, state, and federal fire safety codes, documented by the authority having jurisdiction; also 4-4221, [Mandatory] a written evacuation plan for fires and other major emergency; and 4-4222, [Mandatory] WPPP provide for the immediate release of inmates from locked areas in case of emergency, with provision for a backup system.

There are no fire extinguishers in the housing units. The fire alarm does not work correctly. It has active shorts and other trouble alarms on the fire panels. There are no "panic bars" on the fire exits, despite the fact that there are fences outside that would prevent any escape in case of fire. Except for the front door there are no keys on the inside of the doors. The doors cannot be opened from the inside. There are no quarterly drills as required by the standards. The COs sometimes lock the doors so that a housing unit has no CO for extended periods of time.

SOLUTIONS: Put "panic bars" on the fire doors; if that isn't done, at least put keyholes on the inside. Give a competent provider a contract to clear out all problems with the fire equipment. Commence fire drills on a quarterly basis, and train inmates using ALL the exit doors that might be used during an actual emergency.

4-4224 - Plan for hunger strikes, amongst other things.

I spent 35 days on hunger strike in this prison, commencing February 18, 2011. In trying to persuade me not to start, one of the medical personnel said that there were two people in the hospital in a coma because of a hunger strike. That made no sense to me at the time, because a properly managed hunger strike should not cause a coma.

For the duration of the hunger strike, I was denied electrolytes (salt and potassium). On or about February 23, 2011, I had a stroke, due at least in part to dehydration. I made an emergency request for medical assistance, but was told "the doctor says you need to eat." I called again and begged for help, but was again denied help. I was left lying on the floor, and dragged myself back to my bed.

The depletion of salt resulted in dehydration. Later during the hunger strike, medical and Operations personnel ("Operations" refers to personnel in charge of the prison generally, as opposed to Medical, Education, Food Service, etc.) and came to ask me to take 2 liters of water

with electrolytes by IV. I refused and asked for the same volume by mouth. They all walked away without giving me water or electrolytes. It took about 8 hours of asking to get the 2 liters of water.

I was frequently denied adequate water, especially on day shift. One of my two blankets was confiscated, and I was not allowed to have enough clothes to stay warm. I repeatedly tried to get more clothes and bedding but was not allowed to have it. The cold and dehydration materially degraded my physical condition. I was prescribed salt, and then Gatorade, by the doctor, but Operations overrode the decision.

During the hunger strike, Lt. Chatters came in and confiscated every scrap of reading paper in the room including but not limited to legal mail already delivered during the hunger strike. I wasn't allowed to have any reading material, not even a bible, although they did deliver personal letters. Periodicals were not delivered after Lt. Chatters' search and seizure. I was given a bible when I was transferred to medical to eat for 4 days before being released to general population.

I was kept under constant light 24/7 for the duration of the hunger strike, save for a few occasions when a sympathetic CO turned off the lights. It would usually be turned back on during the middle of the night by someone else who knew that Operations intended to use constant lighting as a psychological weapon against hunger strikers.

The quarantine cell where I was kept for 4 days after I started eating had no light switch. Those lights stay on at all times except during power outages. This violates federal case law and constitutes a serious threat to the mental health of ill inmates.

This prison's de facto policies are totally contrary to law, and are likely to cause the death or serious permanent physical injury of hunger strikers.

SOLUTIONS: Require the prison to post upon the door of any hunger striker a list of the legal rights of the hunger striker, consistent with the BOP Program Statements, federal case law, and the standards of the ACA. Inquire into the circumstances of persons from this prison who have suffered a coma due to a hunger strike. Operations should stop overriding decisions by medical personnel. Put light switches on all rooms in which inmates are confined, and allow all inmates darkness at least 10:00 PM to 6:00 AM.

4-4226 - Written rules for inmates should only prohibit acts that materially interfere with the legitimate interests of the prison.

The comment to the standard says: "The rules should prohibit only observed behavior that can be shown clearly to have a direct, adverse effect on an inmate or on institutional order and security. ... Penalties should be proportionate to the importance of the rule and the severity of the violation."

Many of the rules of this prison, and indeed the BOP, prohibit conduct that is benign, sometimes even beneficial. Furthermore, the enforcement of the rules is completely erratic.

On information and belief, Lt. Chatters wrote a 200 series charge on an inmate for feeding bread to the birds. Feeding the birds is harmless use of food that would otherwise be wasted.

The classic case of rule that violates this standard is the rule against "running a business." All kinds of inmates "run businesses" if that term is used in its ordinary sense. Inmates wash laundry, iron laundry, clean cubes, wash dishes, do legal work, make and sell hobby crafts, draw, paint, and perform any number of other activities for money. None of these legitimate activities are harmful to the prison's legitimate interests. On the contrary, they have a rehabilitative and corrective effect, and should be encouraged.

SOLUTIONS: The rules should be reviewed by experts and members of the local community, with all unnecessary rules abolished. The rule against "running a business" should either be abolished, or it should be specifically construed, in writing, to cover only the operation of businesses that contravene some valid statute. In other words, if a member of the public could earn money doing the same thing, inmates should be encouraged to do it.

In each formal accusation, AKA "shot", the arbiter should consider whether or not the behavior in that instance was injurious to the rights of the prison, prison staff, or other inmates. If it was not, the "shot" should be dismissed, and the rule should be analyzed to see if the breadth of the rule can be narrowed without substantial injury to the interests of the prison.

4-4242 - WPPP giving right to call witnesses, reasons for denying same to be stated in writing. See 4-4240, requiring disinterested arbiters of disciplinary appeals and administrative appeals.

The prison routinely denies the right to call witnesses when the witness is also the accuser, and a member of staff. Often, inmates are prevented from calling other witnesses as well.

There is no disinterested arbiter, as required by federal court decisions on the subject, anywhere within the BOP administrative appeal system. The statistics of the results of administrative appeals, properly analyzed, will show that the administrative remedy process of the BOP is a farce.

SOLUTIONS: Ensure that a staff member who writes a "shot" understands that he or she must not only be prepared to testify, but must also be ready to explain why the conduct complained of constitutes a violation of a substantial right or interest of the prison, its personnel, or other inmates. Grant permission for any appellant of an adverse decision to obtain a qualified arbiter who has no regular employment with the prison or the BOP.

Section D: Special management

4-4255 - Inmates in disciplinary detention over 60 days get the rights of administrative segregation detainees.

This just doesn't happen.

SOLUTIONS: Change policy and practice to ensure that this standard is routinely followed.

4-4262 - At least 3 showers a week in segregation.

The prison turned off the shower water when it became apparent that Stilley was drinking shower water, thus evading their official allowance of 200 milliliters of water every 2 hours.

Stilley was denied a shower for 2 weeks, during the hunger strike. At other times he was allowed a 5 minute shower 3 times a week. There was no legitimate basis for the practice.

SOLUTIONS: Don't turn off the shower water for hunger strikers who keep records of their water intake, reasonably corroborated by the weight of the hunger striker. Replace the pathetic shower heads in SHU with quality shower heads. Allow hunger strikers to shower daily.

4-4265 - WPPP providing that personal property is not to be kept from segregated inmates without written report, not for punishment, and not longer than necessary for safety reasons. See also 4-4261, requiring WPPP to ensure that segregated inmates have access to basic personal items.

Stilley brought only personal property authorized by the BOP Program Statements, when reporting for the hunger strike. All of Stilley's personal property was confiscated and placed in property storage until Stilley was off the hunger strike.

SOLUTIONS: Change practice to allow segregation inmates to possess any property authorized under the Program Statements or the inmate handbook. Change policy and practice to ensure that all property taken from an inmate in segregation is documented.

4-4267 - WPPP requires inmates in segregation to get visitation unless substantial reasons dictate otherwise.

Prison personnel lied to Art Cover, and kept him waiting for at least 3 hours, so they would not have to produce Stilley for a visit, while on hunger strike. BOP Program Statements require that inmates in segregation get visitation equal with those in general population. Segregation inmates in this prison can only have a 1 hour visit on Mondays. General population inmates can have full visits Saturday, Sunday, and Monday.

SOLUTIONS: Stop lying to visitors with respect to inmates on hunger strike. Start obeying the Program Statements with respect to visits for inmates in SHU.

4-4268 - WPPP providing that inmates in segregation get legal materials.

Stilley brought perhaps a half a cubic foot of hard copy legal materials to SHU for the hunger strike. All of it was confiscated and placed in property storage. Stilley had no access to legal materials. Furthermore, the main law library has no access to a great variety of state laws, regulations, and other authorities, and various federal authorities are also missing.

SOLUTIONS: Stop violating the BOP Program Statements with respect to property, including legal materials, for inmates in segregation. Put a Trulincs computer in the room that currently has the legal library for the SHU, and allow SHU inmates to access that resource. Take the steel grates off the legal resource computer; replace it with strong glass if necessary.

Stilley has a long term subscription to internet based Lexis-Nexis. Allow segregation inmates access to a computer with internet access, so that this and other legal resources will be at least theoretically available while in segregation.

4-4269 - WPPP giving inmates in segregation access to reading materials. See also 4-4517, WPPP for inmates to practice their faith.

Stilley was denied access to his bible and his Russian language book. At first he was given a book off the book cart. Later the policy changed, without explanation. After Lt. Chatters ransacked Stilley's cell, taking all reading materials, no other books off the book cart were provided, despite repeated polite request.

Stilley's periodicals were held, in violation of the standards related to delivery of mailed periodicals. However, it seems that denying segregation inmates of access to their subscribed periodicals is standard practice in this prison.

SOLUTIONS: Let segregation inmates possess and use their own reading materials. Let inmates in segregation possess and use electronic books such as E-book, with new books supplied periodically. Cease obstructing the delivery of periodicals to SHU inmates. It should not be necessary to tell a correctional institution not to interfere with the possession and use of a bible.

4-4271 - WPPP giving administrative segregation and protective custody inmates telephone privileges. See also 4-4273, WPPP giving Administrative/Protective custody inmates services substantially equal to those in general population.

Administrative inmates in SHU get only one phone call a month, the same as inmates in disciplinary detention. When Stilley was on hunger strike, Operations falsely contended that Stilley was not an "administrative" detainee, and thus not entitled to any of their protections. Furthermore, administrative detainees are denied educational or programming opportunities, and other rights to which they are entitled under the BOP Program Statements.

SOLUTIONS: Change policy and practice to allow administrative detainees to get as many phone calls as they desire, subject to personnel availability and the phone time limitations applicable to inmates generally. Allow administrative detainees to use tape, CD, DVD, or other audiovisual equipment and media for educational purposes. Inform all personnel that administrative detainees are entitled to any reasonable accommodation with respect to any services available to the general population.

Section E: Inmate Rights

4-4274 - WPPP giving right of access to the courts. See also 4-4276, WPPP giving access to a law library.

Stilley was a practicing lawyer for almost 20 years. As such he had a long term contract for a national legal research package from Lexis-Nexis. This package included access to the statutory and case law, and rules, of all 50 states, and the federal government. Other materials, such as all versions of federal regulations for the past decade or so, are available for free on the internet.

The prison denies all inmates access to the internet, which renders Stilley's package inaccessible and thus worthless. The ACA standard, 4-4276, requires that inmates have access to "...other supplies and services related to legal matters. The law library includes, at a minimum, relevant and up-to-date constitutional, statutory, and case law materials, applicable court rules, and practice treatises."

The prison supplies a hard drive based "Lexis-Nexis" package that can only be described as wretched. Shepardization is a joke. Referenced cases are identified not by their official cite, but by a cite to a page of the opinion! Thus one must, for each case, figure out what the official citation is, and thereupon manually find that individual case, and then go to the page referenced. Of course there are no hyperlinks for Shepardation, although hyperlinks are used in other contexts. The DOJ-BOP, which operates this prison, doubtless spent a fortune creating the illusion without the reality of a suitable research system.

There are no state law materials. I often help other inmates with state legal issues. I can only guess what the state law is, applicable to their factual situation. No human being can effectively research the law on any case of even modest complexity, on such a pathetic excuse for a legal research system. Vastly better legal research tools are available on the internet for free.

Setting forth the extent of treachery practiced in this program is beyond the scope of this document. Suffice it to say that virtually everything about it indicates a conscious object to obstruct the efforts of inmates seeking to preserve their legal rights. There are hard drive based research systems that provide excellent results, at least for some purposes. PITA, by LOIS Law, is an example of such a program. However, PITA has not been sold, except in an online version, for many years.

Inmates formerly were allowed to use Wordpad, but that was taken away when it became clear that some inmates had learned to save documents and go back later to edit or print. Any tool that allows inmates to effectively collect their thoughts and preserve their work is mercilessly sought out and destroyed.

I am writing this document on Trulincs. It is incredibly simple and basic, ancient technology. I cannot change margins, font type or size, create a list, italicize, bold, or underline anything. Copy and paste does not work. But it's the best that I have, so I must use it or have nothing but a typewriter. The cost of supplies for typewriters is untenable, and competition for a typewriter is often fierce. To the extent this document has sane formatting, it's because someone else helped me.

We cannot access Public Access to Court Records (PACER), which would allow us to download pertinent parts of any docket sheet. This would make the actual documents in most recent cases accessible, for 8 cents a page, or for free in case of materials on www.recapthelaw.org. We cannot download forms for ordering transcripts. This prison's policies render inmates an altogether unnecessary burden on court personnel. It's understandable, albeit unfortunate, that some court personnel won't take calls from this prison.

We are allowed to buy Ibico comb binders if we can prove that they are needed to bind a document to be sent out of the prison. We cannot buy them, at any price, if they are to be used to organize and store our own papers. Other common office supplies, such as tabs and sticky notes, are likewise not allowed, or allowed only erratically.

We are forced to use a rickety copier that is routinely broken down, often for days or weeks, occasionally for months. Only 2 light duty printers are available to print Trulincs documents. Inmates aren't allowed to compete with their grossly overpriced monopoly on printing or copying. It costs 15 cents to print a page, whereas I could print for no more than 2 cents a page, counting a reasonable amount for maintenance, using a LaserJet 5si from my office.

SOLUTIONS: Put internet access on all computers in the law library, and let inmates access it through a login and password. Allow inmates to access and use paid or free internet legal resources, to the extent of their own abilities and the abilities of their friends. Allow inmates to bring in and use printers, scanners, copiers, and similar equipment for their own purposes, or for other inmates, either free or for payment. Allow inmates to possess and use legitimate copies of any software reasonably related to legal, educational, or personal needs.

Allow inmates to have an expressly authorized means of exchange. Postage stamps are routinely used for currency in this prison. It is absurd and counterproductive to the corrective function that we cannot have an efficient means of exchange so we can purchase the property or services of other inmates. Relegating us to postage stamps essentially tells us that we are not worthy of any sort of formal economy, and that we must flit through the shadows of a "gray market." That's hardly any way to teach honesty and scrupulous respect for the law to inmates.

Allow inmates to purchase and sell items on Ebay, including but not limited to materials necessary or helpful for educational, legal, personal, or business purposes, subject to supervision of prison personnel or volunteers. At minimum, inmates should be allowed to bid on such items as Ibico binders, office supplies, educational materials, etc., upon approval from a proper person.

4. INSTITUTIONAL SERVICES

Section A: Reception and Orientation

4-4293 - WPPP specifying personal property that inmates can possess, which should include anything that doesn't threaten institutional order, safety, or security.

Inmates in this prison are prohibited from buying raw potatoes, onions, carrots, or eggs. There is no way to possess such items legally. That's why people steal them from Food Service. Some inmates have 20 or 30 years to serve. For many older inmates, it is more probable than not that their sentence (often for relatively modest offenses) is a de facto life sentence.

Yet when I have proposed a system to allow inmates to buy such goods at cost plus, say, 10%, they look at me as if I had two heads. It matters not that fruit was formerly sold to inmates on commissary. It matters not that such raw foods are great tools to encourage better behavior. There is a knee jerk reaction against it.

To my knowledge we have about 4 operable CD players on the compound. Three are in Recreation, one is in Education. Yet when my friend offered me a CD of a religious nature, I had to turn it down. I can't receive the CD, for one thing, and for the other I cannot buy the CD player with which to use the CD. It goes without saying that 4 CD players for 2,000 inmates are just short of a complete denial of access to CD players.

We have a set of Russian tapes in the library. I study Russian because my wife and I adopted two teenagers from Russia, and they are fluent in Russian. Yet I cannot purchase a portable tape player or CD to listen to these tapes. The copyright date is 1963. If I could not legally copy the cassette tapes to CD or DVD, I would ask my friends to buy a set for me online. That would allow me to efficiently study Russian.

Russian language uses the Cyrillic alphabet. I am already signed up and started learning that alphabet on www.alfatyping.com. I only need access to the internet to continue that study. In

addition, some Russian language programming is available on the internet. To my knowledge nothing is accepted as a good enough reason to access the internet.

We are allowed to buy radios for about \$45. A better radio could easily be purchased online for \$20 or less, shipping included. Our radios use AAA batteries, which last only a short time. We have to pay \$2.40 for 4 AAA batteries. We are not allowed to use rechargeable batteries. We generate a huge unnecessary amount of waste batteries, mostly discarded in the trash, due to this misguided policy.

SOLUTIONS: Redraft the rules to prohibit only those items subject to proscription under the terms of the ACA standard. Encourage inmates to purchase educational media and portable equipment on which to use it. Specifically permit the receipt of all sorts of items not contrary to the rules, from online sources, family, or friends.

Section C: Food Service

4-4315 - WPPP requiring accurate records of food served. Employees, guests, visitors, and inmates all get the same food.

There is a separate dining room for the personnel. There are separate personnel in distinctive uniforms that prepare food for the staff.

One reason for this is the fact that inmate food is often prepared without concern for palatability and healthful qualities. Consider a few examples:

- * They make real coffee from real ground coffee for the personnel dining room. Inmates get artificially sweetened coffee made from a liquid concentrate. Offers of inmates to efficiently prepare and serve quality coffee are not accepted.

- * We are commonly served doughnuts with no glaze. They are prepared with highly processed white flour. Thus they are unhealthy and unpalatable all in one fell swoop.

- * We never have raisin bran or other cereals sweetened with healthy choices. In the recent past we had either sugar sweetened cereal that was too sweet or unsweetened cereal. Now it is all unsweetened, which just means that more of it is thrown away.

- * Cake is often made without eggs and with much of the sugar missing. An offer by undersigned to make high quality carrot cake was refused. Because of the poor quality of the food, waste is very high.

- * Employees are served real cheese, some of which is stolen and taken home. Inmates are served little or no real cheese.

- * We used to have a good salad bar, but it is gone. A good salad bar would provide enough alternative food so that many inmates would no longer need a therapeutic diet specifically prescribed.

4-4338 - [Mandatory] Therapeutic diets are to be allowed as prescribed.

The salad bar should provide everything necessary for most therapeutic diets. Obesity, diabetes, and hypertension are rampant on this compound. "Healthy choices" classes are routinely offered in education, at great expense to the taxpayers. However, there is no visible effort to allow inmates to actually make the healthy choices they are advised to make, in the classes.

During the hunger strike, I was prescribed Gatorade by the doctor, whereupon he was told, in my very presence, that this wasn't allowed. Later there was some change, and a purchase order was prepared to get Gatorade for me, so I could get salt and potassium, along with some calories. Yet I was never given a drop of Gatorade.

I was force fed by nasogastric tube, even though I offered to take Gatorade or fruit or vegetable juice by mouth. I'm told that the cost of the force feeding was perhaps \$1,000. Yet the situation could have been avoided by giving me a bit of juice or Gatorade.

SOLUTIONS: Stop Operations from interfering with and overriding medical decisions. Direct the Director of Food Service to work with medical to ensure that, to the extent practicable, the most common needs for a therapeutic diet are available on the salad bar. Give more time to serve meals, so that people can actually get to the food that they need, without starting quarrels or tensions. Ensure that in the few cases where therapeutic diets cannot be satisfied from the salad bar, it will be available from behind the serving line.

4-4321 - [Mandatory] Documentation by independent, outside source, that food service facilities and equipment meet established governmental health and safety codes. See also Section D, Sanitation and Hygiene, [Mandatory] Compliance with health codes and regulations; past deficiencies corrected and documented by outside source.

ALL inmate employee training records are utterly false and fraudulent. They simply have all new hires check EVERY SINGLE BOX saying that they have been trained on EVERY SINGLE PIECE of equipment in Food Service, despite the fact that no training at all has taken place. I have offered to supervise the correction of these false records, but my offer has been rebuffed.

They put inmate Charles Vinson back to work cleaning the serving line, while he still had open sores from drug resistant staph (MRSA). He had been in the hospital for an extended stay, necessitated by the refusal to timely treat the disease. We periodically have an outbreak of MRSA, caused mainly by 1) overcrowding, 2) use of anti-bacterial soap, which simply strengthens the strain, and 3) the use of no soap at all in most bathrooms and other facilities on the compound. Vinson has transferred to another prison, but you can find him at the BOP inmate locator. Ask him, and more importantly, check the employee records against the records of hospitalization.

On information and belief, inmates with hepatitis are allowed to work in inmate Food Service. Check the records, and cross check with records of persons having communicable disease. Ask me if you want further information. You will see that the selection of inmate workers for inmate Food Service is only slightly more scientific than "eenie, meenie, minie, moe." However, for the personnel Food Service, only the best inmates are hired.

SOLUTIONS: The first necessity is to get a Food Service administrator with the power and an incentive to run Food Service in efficiently and in compliance with health and safety codes. Recruit, train, and compensate Food Service employees as if there was some intent to get competent labor. It is CRITICALLY IMPORTANT that the administration of this prison be dragged, (kicking and screaming, no doubt) into the computer age. I've offered to upgrade their records, but only with access to an operable computer system with decent software.

Eliminate the separate Food Service for employees.

4-4322 - WPPP for food service medical clearances; washing of hands after using toilets; federal facilities to follow US Public Health Service regulations.

See above for the sad state of affairs with respect to medical clearances.

We just got new placards in the Dining Room telling inmates to wash their hands. However, only one soap dispenser in the entire Food Service building (other than those in bathrooms for non-inmate employees) is stocked with soap. That soap dispenser is unavailable to ANY of the diners, and is routinely unavailable to large numbers of Food Service employees.

NO Food Service bathroom is stocked with soap or paper towels. The dish room soap and paper towel dispensers aren't stocked. The soap and paper towels in the bakery, vegetable preparation, and the butcher shop are not stocked, although inmate employees are routinely locked in those rooms for extended periods of time. (How's that for a fire trap?)

This prison sent a written letter to OSHA claiming that they stocked all those dispensers. I was put in charge of the stocking. At a later time I was fired. A few days later I was reassigned to Food Service but given no duties and no pay. I tried to stock the soap and paper towels anyway. A CO warned me not to do it again. That was last year, and no one has been stocking the soap and paper towels.

On Wednesday, November 3, 2010, Mr. Michaels came from Regional for a medical open house, due to a large medical malpractice judgment against the prison. Mr. Michaels promised to get PLAIN soap (no antibiotics) throughout Food Service and throughout the compound, in all bathrooms. This prison immediately repudiated this promise.

I personally told Warden Outlaw about this promise, while on hunger strike. He said words to the effect "Mr. Michaels doesn't run this prison." Earlier this year, I told Gerardo Maldonado, Jr., Director of Regional, about this promise. He said basically the same thing, that Mr. Michaels didn't run this prison, Mr. Outlaw does.

SOLUTIONS: Let inmates use UNICOR manufacturing facilities to the extent not needed for official production. Let inmates buy and stock plain soap throughout the compound, paid for by their own earnings. Let inmates pay fair value for their use of the UNICOR facilities by 1) provision of educational services; 2) Provision of competent labor for Food Service; 3) provision of food, supplies, and other goods and services that save taxpayer moneys.

4-4326 - WPPP for minimal regimentation of meals; open dining hours. See also 4-4158, requiring adequate dining space and at least 20 minutes to eat; and 4-4327, group dining except where security or safety considerations justify otherwise.

I was put in SHU for 3 days last year, when I tried to eat my food after being thrown out of the Dining Room only about 5 minutes after I got my food. That was a fog day. I proposed a means of eating inside the housing units on foggy days, but was ignored.

Breakfast is routinely served in less than an hour, although the maximum seating in the dining room is 468, and we currently have close to 2,000 inmates. COs often go through the Dining Room, screaming at inmates, telling them to get out of the Dining Room.

SOLUTIONS: Serve breakfast from 6:00 AM to 8:30 AM; and the other two meals for a set period of time of about 3 hours each. Eliminating overcrowding would allow a modest reduction of these meal times.

Section D: Sanitation and Hygiene

4-4338 - Entitlement to laundry service.

Our clothes dryers don't vent to the outside, which causes mold and mildew and condensation that drips from the ductwork onto floors, ceiling tiles, etc. The washers and dryers are inadequate for the overcrowded conditions, and poorly maintained. This contributes to respiratory and other illnesses.

SOLUTIONS: Vent the dryer exhaust to the outside, with a sensor controlled power assist fan. Install 2 over/under washer/dryers in each unit, along with at least one additional regular washer, plus the three dryers that are currently in place. Allow inmates to wash and dry clothes 24/7, except during counts or at other times when valid reasons exist. This would allow inmates who wash for money to wash during the overnight hours, and take some of the strain off the system during the daytime.

4-4340 - WPPP providing for bedding, linens, pillows.

Our bedding is substandard, floppy, weak bed mats that break down within weeks. Then when inmates try to fix them using material from defective mats, the personnel get mad, confiscate the repaired mats, and throw them away. Thus we often have no mat fit to lie upon. Some of them won't keep the inmate's body an inch away from the steel rack upon which the mat is placed.

Also we don't have pillows. The BOP inmate transfer center in Oklahoma had good single bed mattresses with quality pillows. Why can't this prison provide the same thing? Even if they were only sold on commissary, at least we should have a chance to buy a decent mattress and pillow. The "built in pillows" are not worthy of the name "pillow." The mats break down under the weight of the torso, which leaves the inmate sleeping in a hole, essentially.

Plus a lot of people snore. They will snore a lot less, have less back problems, etc., if they have a separate pillow. We need separate pillows, and also snoring prevention supplies such as Breathe-Rite strips. It's not important just for the snorer. There are times at night when this prison couldn't pass the noise standards of ACA, due solely to snoring. There's no reason not to acknowledge the humanity of the inmates and alleviate their suffering somewhat.

SOLUTIONS: Breathe-Rite strips; mattresses and separate pillows, each being of quality equal to those used at the Oklahoma City Inmate Transfer Center.

4-4351 - [Mandatory] Written plan for emergency medical, dental, and mental health services availability. See also 4-4350, written treatment plans approved by doctors and dentists; 4-4349, transportation for medical or dental services; 4-4360, routine and emergency dental care under supervision of dentist; [no standard number] the formulas for outcome measures, with respect to unimpeded access to health care services; and 4-4351, allowing students, interns, and residents to provide services.

Medical service is very poor at this facility. Although some of the personnel may be substandard, that is not the principal driver of the failures. Operations do not allow medical services to do its job. People going for callout are repeatedly put off.

The first question out of the doctor's mouth is usually "how long are you going to be here?" The goal of medical is to get you to the door. Anything that can be delayed or denied is delayed or denied. The suffering of the inmate while incarcerated, the costs to society of such shortsighted thinking, and the inefficiency of such an approach, are scarcely considered.

Medical equipment and supplies are haphazardly supplied. Personnel using the equipment and supplies don't have an effective means to ensure that they have the equipment and supplies necessary to do a good job.

As bad as medical is, dental is far worse. They don't always have a dentist, partly because they place such burdens on the dentist that no reasonable dentist would want to suffer under it. The need for dental services is some multiple of the supply provided. The possibility of needing dental work is terrifying to any reasonable inmate. Most of the time it will be virtually impossible to get it.

SOLUTIONS: Allow "open movement" on the compound during regular hours for medical, so that inmates can get to and from medical for services at the scheduled time. This is a "low security" prison, which has no need to close the compound except for counts, emergencies, or other specific needs.

Implement an ordering system that allows the rank and file medical personnel to place orders for supplies, subject to approval of the administrator. Give medical flexibility with ordering and stocking of medical supplies.

Institute real and substantial individual and group incentives for inmates to improve their own health. Institute a good salad bar, with fresh juices available for juice fasters, on a daily basis. Allow inmates access to equipment to take their blood pressure, and to chart changes. Make sure that inmates have time to eat without being hurried. Many inmates overeat simply because their body hasn't had time to register fullness.

Hire at least 2-3 dentists, with a full complement of support, until at least 90% of all inmates have a completed dental plan. Contract with outside dentists to the extent practicable. Use students, interns, and residents as much as possible for both medical and dental services. Let inmates have furloughs to go to their own dentists if they have one.

Stop accepting new inmates until medical and dental service statistics comply with all ACA standards.

4-4354 - [Mandatory] Written plan to address infectious and communicable diseases.

If they have such a plan I want to see it. They won't let us earn our own money to buy our own soap. They squander many times the cost of the soap on entirely unnecessary hospitalizations for MRSA alone.

SOLUTIONS: Let inmates contribute ideas toward the drafting of a written plan. Put the plan in the library and give notice that the plan may be reviewed there. Engage the co-operation of inmates in controlling the infectious and communicable diseases on this compound.

4-4359 - [Mandatory] Plan for treatment of chronic conditions such as hypertension and diabetes. See also 4-4363, wellness information, including self care for chronic conditions.

Once again, I have never seen any such plan, and doubt that it exists. They do put inmates on chronic care, but the solution is mostly the prescription of chemicals to mask the symptoms rather than to address the underlying problem. Chronic conditions are the primary drivers of the health care crisis that threatens the very solvency of the federal government.

Yet they are mostly preventable. During my hunger strike (admittedly a bit of a drastic approach) my LDL (bad) cholesterol dropped by about half. Juice fasting is perfectly tolerable to most people, especially if they can do certain cleanses beforehand, to assist the body in dealing with the detoxification of a juice fast.

SOLUTIONS: Engage the inmate population in drafting the plan. Periodically review and revise the plan, as necessary based on experience. Let inmates research health information on the internet. Let inmates prepare and distribute wellness information as part of an inmate newspaper.

Reward inmates individually, as groups, and as a whole, for discrete milestones toward goals for reducing the incidence and severity of these conditions in the inmate population. Encourage competition in improving health and fitness.

4-4348 - Periodic and pre-release physical examination.

The whole mindset of the prison is to get the inmate to the door in one piece. There is no desire to admit the adverse health consequences of the incarceration.

SOLUTIONS: Start following the ACA standard.

4-4375 - Prostheses and orthodontic devices such as eyeglasses and dentures.

The eyeglasses here are hard to get and pathetic when you do get them. Dentures and partials are barely on the radar screen.

SOLUTIONS: Prescribe and supply eyeglasses that middle class citizens would purchase and use on the street without compulsion. After all, they're not something that can rationally be turned in and used again for another inmate. Commence a program for getting every inmate mouth in good shape within 6 months of their arrival to this prison.

4-4381 - Clinical decisions are the sole province of the responsible clinician, not countermanded by nonclinicians.

The administration of this prison has no fear of overriding the decisions of clinicians. During the hunger strike, they did it right before my very eyes. I was prescribed salt. The director of medical said I was not to be prevented from getting salt off my trays. Yet my salt was

confiscated up the very last day. I was allowed to get salt the day before, but they also force fed me with a nasogastric tube that day, due to concern over my medical condition.

I laid on the floor of my cell begging for emergency care for a stroke. Operations told me the doctor just said "you need to eat." I want to see evidence that the doctor was actually so callous to a condition that could have killed me, or left me permanently disfigured and disabled.

I was prescribed Gatorade but never got it. Operations countermanded that decision, preferring to force feed rather than allow me to have Gatorade or fruit or vegetable juice.

SOLUTIONS: Fire Warden Outlaw and replace him with a warden that has some competency and respect for the law. Warden Outlaw is openly hostile to the medical rights and needs of inmates. Check his history. Whenever his incompetence is exposed, he moves on to another prison.

4-4390 - First aid kits available in designated areas of the facility.

They don't have such a thing even for inmate employees. When I smashed my finger while working in the dish room last summer, I asked to get something out of the first aid kit. I was told they had no such thing.

I went to medical, where I was given a bandaid. I asked for antibiotic ointment. I was brusquely told to buy it on commissary.

That was a Sunday, and my commissary day was several days away. I was too stunned to come up with a comeback. I know they had 1 gram foil packets of antibiotic in medical, I've seen them. Operations has simply poisoned the culture of medical to the point that such intolerable practices are acceptable.

SOLUTIONS: Prepare and place well stocked first aid kits in every housing unit, in Food Service, Recreation, and in the Pharmacy. Restock each kit at least monthly.

4-4408 - Reports and meetings at least quarterly to address health issue. See also 4-4422, measurable goals and objectives for medical program, reviewed and updated at least annually. 4-4409, statistical reports of important health care services, and statistics of serious injuries, illnesses, deaths, etc.: and 4-4410 [Mandatory] Documented internal review of various items including illness outbreaks, and other statistics.

This prison had notices on the wall of the Dining Room saying that inmates were entitled to the statistics listed above. When I asked for copies of the statistical reports, the notices were taken off the wall. My request, on the other hand, was ignored.

SOLUTIONS: Put the notices back on the wall. Make the statistical reports available on the internet. These are matters of public concern, not simply inmate concern. Families are entitled to know how their incarcerated relatives and friends are being treated, and the medical threats and challenges they face.

Eliminate the interference with medical. Engage the inmates in solving adverse medical outcomes. Give substantial positive reinforcement for positive health outcomes, both individually, as groups, and with respect to the inmate population as a whole.

4-4413 - Complete health record file, paper or electronic.

The prison scans in hard copy documents and makes them available to health care workers online.

I asked for my health care records, during the hunger strike. I asked for myself, and by separate request sought a copy for myself. Both requests were ignored.

SOLUTIONS: Give inmates electronic access to their medical records. We already have means of accessing our personal records. We only need a means of accessing our medical records with the same codes, or with a separate code assigned for that purpose. There are commercial services that provide health care record management. There's no need to re-invent the wheel, the prison (or the BOP as a whole) can contract with a reputable supplier of this type of service. It will be cheaper and better than anything the BOP could imagine. More importantly, it will actually work, and this can be implemented immediately.

Section G: Release

4-4443 - Temporary and Graduated Release

The standard calls for an adequately staffed and funded program for temporary and graduated release. The law permits up to 6 months of halfway house, and up to an additional 6 months of home confinement.

In fact, according to personnel at this prison, Regional routinely denies requests for home confinement. This practice, along with policies that encourage rather than discourage recidivism, are the primary reasons that this prison is overcrowded.

Harley Lappin testified to a US Congressional Committee on March 15, 2011. He testified that the BOP has quantified the additional violence, stress, and other adverse outcomes resulting from overcrowding. It is incontrovertible that overcrowding provides results that are opposite of those reasonably expected by the taxpayers who pay for this facility. Apparently Mr. Lappin (the first listed member of the Committee on Standards at page viii of the 2010 Standards Supplement) recently resigned after a conviction of drunk driving, but his conclusions are no less valid.

SOLUTIONS: Inform Regional that they are part of a the BOP, a system that maintains the incarceration of almost 1 in 10 persons incarcerated in the United States, and that they are expected to do their part in maintaining the high standards of ACA. Obtain and publish for public consumption the statistical information concerning overcrowding, the grant or denial of temporary or graduated release, recidivism, etc. Withhold accreditation until this prison presents proof that it reasonably considers requests for temporary and graduated release, and decides them in a fashion suggesting an honest attempt to perform their legitimate functions in a competent and workmanlike manner.

4-4445 - WPPP for escorted leaves.

The comment says that inmates should be allowed escorted leaves of absence to obtain medical care not available in the institution, to visit a critically ill family member, to attend the funeral of

a family member, to participate in community events as a member of a group or team, or to participate in other community activities that can have a positive influence on the inmate.

It is virtually impossible to get any such leave. Many inmates have been denied the opportunity to attend the funeral of a child, parent, or sibling. There is no attempt to comply with this standard.

SOLUTIONS: Implement policies to allow prompt approval of escorted leaves, using bond, GPS devices, and other means to ensure that public safety is maintained, without undue cost to the taxpayers.

5. INMATE PROGRAMS

Section A: Work and Correctional Industries

4-4452 - Facility provides opportunities for inmate employment in correctional industries, facilities, operations, public works, or community projects. See also 4-4448, written plan for full time work and/or program assignments; and 4-4458, WPPP for realistic work assignments of inmates, for a realistic workload.

Meaningful work opportunities at this prison are slight. UNICOR facilities are effectively utilized for a fraction of a single shift. Yet the administration will not trade the use of these facilities for work or money from the inmates. If this was done, it is likely that the inmates themselves could pay for millions of dollars worth of educational services, substantial quantities of food for Food Services, and at least some medical supplies and services.

Ghost jobs for inmates abound. Pay for both ghost and real employees are erratic, usually inadequate, and often altogether unrelated to work actually done. Yet important jobs such as fixing plumbing in the housing units, venting dryer discharge to the outside and cleaning 2nd floor windows, just doesn't get done.

SOLUTIONS: Lease UNICOR facilities to inmates, in exchange for fair market value in money or moneys worth, to include educational services, foodstuffs, and medical supplies or services, with the approval of the heads of Food Service and Medical Services. Allow inmates to engage in subsistence agriculture, to the extent of availability of land and other resources, for profit. Allow and encourage inmates to buy items on Ebay, fix them, and resell them, as a business opportunity.

4-4453 - WPPP should assist in providing skills relevant to the job market. See also, under Section B: Academic and Vocational Education, 4-4465, WPPP for educational program consistent with needs of inmate population, and 4-4476, flexible scheduling for educational programs.

The skills taught are generally out of date and/or irrelevant to the current job market. It is impossible to prepare inmates for the working world without teaching keyboarding, use of modern computer programs, and use of the internet. Yet access to the internet is prohibited.

The most critical need in this prison is for basic academic skills. Inmates are used to teach basic education classes. Compensation is totally inadequate. The inmate instructors get perhaps \$10 or \$20 per month. The inmates who complete a GED are supposed to get \$25. There is no

compensation for quality of results, by the BOP. Twenty five dollars per student isn't sufficient to seriously motivate an inmate who lacks basic skills. The result is a dysfunctional educational system.

The formality and inflexible scheduling is so stultifying that it discourages all but the most determined inmates from seriously pursuing the education that they need. For example, it is possible to learn keyboarding, but only from a very basic program in a small room in Education with a few computers and inadequate space. Inmates cannot practice keyboarding in the housing units, where they have plenty of spare time.

SOLUTIONS: Put computers with internet into the housing units, along with basic library facilities, a heavy duty printer, and basic office supplies and equipment. Encourage inmates to use www.alfatyping.com to learn keyboarding. Encourage writing skills, tasking the more literate inmates with assisting those less skilled in learning effective writing. Allow inmates work release, to go into the community for work.

Focus solely on educational outcomes as determined by independent testers, from the community. Cease payment of taxpayer money for education OF ANY KIND!!! Let the inmates using UNICOR facilities pay inmate instructors a tolerable wage, on the basis of results proven by independent testing, and not otherwise. Keep statistics and make them available to the public and to the inmate population.

Section C: Recreation and Activities

4-4484 - Equipment and facilities for leisure, well maintained, proportionate to inmate population. See also 4-4407 under Section E, Health Care, providing that exercise areas may be available.

The Recreation Building is undersized even for an inmate population at rated capacity. It is altogether inadequate for an overcrowded compound.

The exercise room is so small and poorly ventilated that condensation will literally run off the windows and puddle in the floor, in the wintertime.

Vegetation is mowed too often and too short, with no watering of the grass, resulting in bare spots on the soccer field and on the walking track. A previous warden cut down all trees and woody plants, apparently for no reason other than spite.

There are no Bowflexes, and no similar equipment for strength training. Prison administration is fearful of inmates becoming too strong, not understanding that their power cannot under any circumstances be predicated upon superior physical strength.

The toilet facilities are totally inadequate for a population of 2,000 inmates, resulting in waiting lines, and urinating in the open, to the extent of killing the grass in certain places.

There are no nets for the volleyball courts.

SOLUTIONS: Use the Recreation building for storage of equipment, to be placed outside for use when appropriate. Upgrade the ventilation in Recreation, to maintain proper temperature, air quality, and humidity levels.

Hire inmates to repair eroded areas of the walking track, sprig new grass, and water it. Alternate use of walking trails, limit mowing as much as possible, to maintain a good sod on the walking track. Sprig the soccer field, and irrigate and fertilize it until it is well established. Then make sure that it is well watered during dry weather. Limit use during extreme wet weather. Plant a variety of high quality trees.

Purchase Bowflexes, or let inmates work for money to buy them. Make a list, with inmate input, and purchase recreation/leisure equipment according to inmate interest. Purchase and maintain volleyball nets.

Make and use portable outside toilets for urinating. Move them around so the grass is not killed in any particular spot.

4-4486 - WPPP for activities such as inmate publications and honor housing.

There are no inmate publications. Inmate co-operation and collaboration, even for the most benign reasons, is viewed with great suspicion.

Not only is there no honor housing, there is no attempt to sort inmates according to behavior. Group punishment such as vindictive "shakedowns" are used to punish bad behavior by a very few inmates. If "hooch" (homemade alcohol) is found in a unit, the entire unit may lose the use of microwaves, TVs, etc. Threats have been made against visiting privileges for such things. Yet good behavior could be obtained from most of the inmates simply by demonstrating that administration has some awareness of who is naughty and who is nice, with carrots and sticks to follow.

SOLUTIONS: Allow inmates to publish their own newspapers or newsletters, using their own publishing software and printing equipment. Allow inmates to operate microtransmitter radio stations, with less power than that which is regulated by federal authorities. Cut overcrowding. Create "honor" housing units, with extra privileges. Invite inmates to propose beneficial activities.

Section D: Mail, Telephone, and Writing

4-4490 - Written policy and procedure for publications.

This prison routinely withholds the Arkansas Democrat-Gazette for 5-10 days. The prison does this for its own subscription, and also for subscriptions purchased by or on behalf of inmates.

Inmates in SHU don't receive their subscribed periodicals until they get out of SHU.

SOLUTIONS: Deliver all publications (periodicals such as newspapers and magazines) immediately upon receipt unless there is a bona fide question about their deliverability under the rules.

4-4495 - WPPP for processing letters within 48 hours, packages within 72 hours.

The mail room is very poorly run. From time to time letters will be physically cut up for days on end. I don't even see how the censors can deal with mail that is cut to pieces. They periodically quit cutting the mail up, but always seem to go back to their old ways. Lots of mail is "lost."

4-4497 - WPPP that inmates be provided the most reasonably economical phone service.
[See updated standard at page 89 of the 2010 Standards Supplement]

We are charged 23 cents a minute despite the fact that MagicJack will provide VOIP (Voice Over Internet Protocol) phone service for \$20 per year per line. Skype is also exceedingly cheap. Most of the illegal cell phone possession in prison springs from 1) Overpriced phone rates charged for official phone service, 2) Limitations on the number of minutes per month, or 3) Lack of phone availability at critical times.

Each housing unit has 4 phones. All but one phone is turned off during the daytime. There is no good reason for this practice. Inmates are limited to 300 minutes per month, even at the 23 cent per minute rate. There are no phones at any common location, which would allow an attorney or other person learned in the law to freely assist other inmates with calls about legal matters. Inmates using "conscallhome," for cost savings, are threatened.

SOLUTIONS: Leave the phones on 24/7 except during count or other times when good reason exists to turn them off. Install phones in the library or other common area, so that any inmate can assist any other inmate with a phone call. Apply the 300 minute limit only to prime time evening hours, to ensure that all inmates have an opportunity to use the phone. Post notices on the wall encouraging inmates to use services such as "conscallhome" and thus get the 6 cent per minute rate for local calls.

4-4498 - WPPP that visitation can only be limited by space, schedule, and personnel constraints. See also 4-4156, visitors must be able to leave personal items inside, for storage during a visit, and 4-4500, written policy and procedure allowing special visits, visits from persons coming long distances, persons in segregation, etc.

Visitation is rarely adequately staffed. Visitors often wait hours to get in. Visitors are often treated as a nuisance, not as a valuable contributor to the correctional process. Visitors who have 2 keys instead of 1 will be told to take the key back to their vehicle, rather than allowed to put it in safekeeping.

Visitors are often crowded together even when the visiting room isn't full. There is an outside visitation area that is only rarely used.

This prison has sent international travelers away for some minor administrative detail such as the lack of prior approval for visitation, even when their suitability as a visitor was undeniable.

During the hunger strike, Stilley's ex brother-in-law Art Cover was lied to and delayed for at least 3 hours, to prevent Mr. Cover and his children from visiting Stilley. Stilley was told that he had come to visit only after Mr. Cover left. The offending employee said that it was hard to look at Mr. Cover's children, which he mistakenly assumed to be Stilley's, and lie to him about the availability of Stilley. Stilley was hustled off to medical to create the pretext that he was truly unavailable for the visit, when Stilley most certainly was not unavailable.

The inmate toilet for visitation lacks privacy, in that it is in the search area for inmates entering and leaving visitation. Inmates are allowed to use the toilet only during arbitrarily set times, such as 12:55 to 1:05, 1:55 to 2:05, etc.

Standard operating procedure is to allow inmates in segregation, even if they are there only for protective custody, only one hour per visit, and no visits except on Mondays. This discourages most visitors from coming at all, which seems to be the point of the exercise.

The vending machines often run out of product, because there is inadequate space for vending machines. Much of the product is unhealthy drinks. Bill changers are often out of coins.

SOLUTIONS: Staff visitation sufficiently that visitors can be processed in within 15 minutes of arrival. Announce visitors when they first arrive, so that inmates will be in the visiting room when their visitor arrives, thus wasting less time. Leave the entire inside and outside portions of visitation open all the time. Put a door on the inmate toilet to provide privacy for inmates. Allow inmates to use the toilet whenever they need to use the toilet, unless the access room is being used at that specific time for strip searches. Arrange for the operator of the vending machines to supply extra product to be stocked by an inmate employee. Encourage the vending machine operator to stock healthy choices such as V8 juice, other natural juices, etc.

The entire mentality of the administration of this prison needs to change, to stop the lying about visits, cruelly denying visits to people who have invested a small fortune to come, etc.

Start obeying the BOP Program Statements, which provide that inmates in segregation get visiting privileges commensurate with those of the general population, unless part of the punishment duly imposed, is loss of visiting privileges, or other limited and specific reasons related to security or safety.

4-4501 - Extended visits including up to three days home on furlough for inmates of suitable security level, and extended family visits on institutional grounds.

The standards provide that inmates be immediately informed of deaths and critical illnesses. According to the standard, qualifying inmates should be allowed to go to the bedside of an ill family member, alone or under escort. Yet this prison won't let a non-violent inmate of the lowest security risk go home for the funeral of a child or parent.

There is no place on the grounds suitable for extended family visits, to the knowledge of Stilley.

SOLUTIONS: Implement policies to allow low risk inmates regular furloughs, and special furloughs for such events as funerals, weddings, etc. Use innovative means such as GPS, security bonds, etc., to ensure safety and security during furloughs.

Section E: Library

4-4205 - Comprehensive library services. See also 4-4510, library services seven days a week, and in evenings, and 4-4511, WPPP for inmate library assistants.

The library is far too small, having seating for perhaps 30 inmates. Periodicals (for example, The Economist) are often allowed to lapse on grounds of inadequate funding. The Arkansas Democrat is subscribed, but it is routinely placed on the paper rack 5 to 10 days late.

The library closes for lunch, on Friday and Saturday evening, and all day Sunday.

Segregation inmates have very few papers or periodicals to choose from.

The housing units have no means for inmates to effectively share their old periodicals, and other reading materials, with the population of the housing unit as a whole.

The library has only one CD/audiotape player to share amongst 2,000 inmates. No other audiovisual equipment is available in the library.

SOLUTIONS: Make funding for library periodicals a priority. Collect periodicals and immediately make them available in the library.

Use the adjoining classroom to provide additional space. Nothing is required save to open the door between the two rooms, although some modification of the room would be beneficial.

Keep the library open through lunch, and 7 days per week. Allow library workers to eat in shifts to maintain personnel at all times, thus increasing the total amount of available library time.

Take old periodicals to SHU or to the housing units. Put enough shelving and newspaper racks in the housing units to allow inmates to have at least a reasonable amount of reading materials in the housing units.

Let inmates purchase their own tape players, CD players, and DVD players. Purchase E-book readers for use in the library, for hard to find or hard to access resources such as foreign language material.

Put internet on all the computers down the hall from the library, in the computer lab. Take down the sign that threatens inmates with punishment for using the computers for personal or legal purposes. Put up notices in the housing units to the effect that inmates are encouraged to use the computers in the computer lab for personal or legal work. Put at least some computers in each of the housing units, and encourage inmates to use them for educational purposes.

SUMMARY AND CONCLUSIONS

ACA's official "Standards For Adult Correctional Institutions (4th Edition)" explains the accreditation process in the "Introduction to Accreditation" as follows. There should be a self evaluation by the prison. Afterwards, ACA personnel interview staff and offenders to make compliance decisions.

The accreditation process will include a compliance tally. Insufficient standards and expected practices, and inadequate plans of action, are sufficient to deny accreditation. "Candidate Status" may be extended if the agency is actively pursuing compliance. "Totality of compliance" is the key consideration. The ACA may require the agency to submit written responses to public criticism, notoriety, or patterns of complaints. The reasonableness of the ACA standards is not open to question, as a basis for reconsideration of an adverse decision.

I respectfully request that the charges laid at the feet of Warden Outlaw's administration, in this document, be provided to him for response. If he disagrees he should so state, and provide a

copy to me. I will include his responses, and my reply, on the same blog that this document is being published, www.oastilley.wordpress.com.

It is the Warden's job to formulate written policies and procedures, and to enforce practices, necessary for the effective operation of this prison. Standard 4-4003. The Warden is responsible for the formulation of goals, and for translations of those goals into measurable objectives. Id. See also 4-4009, which says that the warden must have demonstrated ability and leadership; 4-4012, which requires that the philosophies, goals, and objectives of the institution be made public; 4-4021, requiring among other things compliance with state and federal Freedom of Information laws; and 4-4017, requiring a system to monitor operations and programs.

The core function of a "correctional" institution is to correct bad behavior. Yet there is to my knowledge no goals or objectives by this prison administration, or by the BOP as a whole, with respect to recidivism rates. The US has 5% of the world's population and 25% of the world's prisoners. Yet the United States has one of the highest recidivism rates in the world. On information and belief, the recidivism rate in the BOP is close to 70%, with a re-incarceration rate, within 3 years of release, in excess of 40%.

It isn't impossible to lower recidivism. In the November 15, 2010 edition of Fortune magazine, Corey Booker, Mayor of Newark, New Jersey, is quoted as having reduced recidivism rates to as little as 10% or less. USA Today recently featured an article on the prison system of Norway, which boasts a recidivism rate of only 20%, despite the fact that Norway incarcerates fewer but more dangerous and criminal individuals than the United States. In each case the responsible parties identified and addressed the root causes of the recidivism, such as economic desperation.

There is no good reason this prison cannot excel at the corrective function, if a competent administrator makes the correction of bad behavior a priority. Unfortunately, this prison has for all practical purposes abandoned the corrective role. It is a very poorly managed warehouse for humanity. The resulting high recidivism is responsible for most if not all of the overcrowding; and the overcrowding interferes with the correction of bad behavior. It is a vicious cycle that can be broken only by conscious effort by a competent administrator.

I'm happy to be a resource for correcting the shortcomings identified in this document. I am not satisfied to allow this prison to be granted accreditation under the status quo.

I respectfully request that ACA keep me and the public reasonably informed with respect to the documents and information generated for the accreditation process, to the extent that same is not privileged under applicable law or prohibited by the contract with this correctional institution. I would be equally satisfied if this information was provided to me by the administration of this prison.

Respectfully submitted,

/s/ Oscar Stilley

Oscar Stilley, 10579-062
Os - 06/27/11