

Report from David Parker on Oklahoma County Jail Systems and Operations

I want to thank the Oklahoma County Jail Trust for the opportunity to be part of the operational and cultural change transitioning within the Oklahoma County Jail. Stakeholders will agree the jail has long been a focal point of controversy and continuous filler for the local media. We live in a time of instant gratification and transparency, thanks to the multitude of platforms available at a moment's notice. This is both an opportunity and a curse depending on whose eyes you are looking through. I have witnessed loyal dedicated employees who simply know no other way a jail is supposed to operate because their scope of knowledge is singular or who, over the years, have not been afforded progressive training. I have witnessed Trust meetings where similar scenario applies to those in attendance. You have patrons who are arguing and seeking change often based on perceptions, realities provided by secondary sources and even some limited firsthand knowledge, but not complete insight. For years I have seen the media speculate or run with a singular version of a story because that is the only accounts they had, and their stakeholders deserved to know some details. I have witnessed over the years a political tear in the operations as a stakeholder while residing in Edmond. More recently I have witnessed fractures up close that compound the growth and development of the jail. Having documented these observations, I am contractually bound to offer suggestions for a solution. I will share those throughout this report. In my career I have created and resolved a multitude of roadblocks in a detention setting. There is a reason the adage "The Older We Get the Wiser We Become" exists, because it is true. I learned through each of those triumphs and disasters. On the best day, a jail is not a place anyone wants to be. They are a necessity of our society. Times have changed and government is often slower to move forward, and it usually takes the courts or a catalyst to see that happen. At this minute I see both components present at the Oklahoma Jail that is pushing for change. I present this report to the Oklahoma County Jail Trust and Jail Stakeholders based on my observations of the operational system throughout the Oklahoma County Jail along with my skills, knowledge, and abilities. I have through my 38 years of mistakes and applied corrective actions saw a need to focus on the booking process. This consist of Intake, Mug Shots, Prints, Classification, Property, Medical, Bonds, and Release. This report is compiled using onsite observations, interviews with random staff, arresting officers, incarcerated citizens, communication with members of the Trust, reviews of policy, staff training, staffing patterns, and assorted documentation or the lack of documentation. I would be remiss if I failed to say that the process of "change" in layman terms is not instant but came be seen more as "a marathon than a sprint". In no way am I attempting to discredit or downplay any prior authority in my next statement(s), but the way stakeholder's accountabilities have elevated. Advancements in science, the understanding of mental health, criminology, and human behavior has advanced at an accelerated rate in the last 25 years as none before. There have been decades of difficulties, different management philosophies, physical plant issues deferred, with no significant advancement or implementation of staffing analysis and it appears no significant advancements in transparency to effect change. You have the one component in place to achieve the three basic steps of a quality measurable operation. Those components are:

1. A sound cohesive management structure
2. Measurable out-come based policies
3. Quality skills, knowledge, and abilities-based training

The Trust members I have had the opportunity to meet, along with Greg Williams, are dedicated and are laying the foundation with a **Cohesive Management Structure** because they are stakeholders as well. There are consultants who offer boilerplate reports by cutting and pasting bits and pieces together using

variants from similar ventures. That report can be skewed to generate desirable outcomes based on the perspective offered in the scope of the agreement. I have seen those reports completed, then thrown in a drawer and left for various reasons. They did not say what was desired, the cost was too great to implement, new leadership changed priority, or my personal favorite; someone orders an interim study be conducted to review the findings. I have even heard of one that was completed saying the jail needed 600 employees to operate. I bring this up to say this contract, while limited to 160 hours, was broad enough to allow me to offer real, applicable, low-cost applications and, if implemented, will help improve operations within the jail. I am confident in my declaration(s) because I have seen each offered suggestion in action and working. Mr. Williams and I further agreed he would not offer any specific direction that could limit or skew my observations. I believe many of these suggested improvements are familiar to the Jail Administrator, Greg Williams. I am firm in believing he had many of these same ideas looming, but time is often a factor in development of any plan of action. Six hours of his day are dedicated to crisis intervention whether with detainee incidents, staffing incidents, stakeholder incidents, media, freedom of information requests, planning meetings, and so much more. The advantage I had in the 160 hours of this contract was that I could specifically concentrate on analyzing observed potential problems and develop applicable fixes. I will turn in my report, but Greg Williams and the Trust will have to determine when or if implementation will occur. I must also advise that the data and figures used in this report are in continuous fluctuation.

Change is often difficult for the staff who are affected directly and often do not have the insight or development to articulate from every angle. Changing the operational culture at the jail will be your single greatest challenge while it is the most urgent need. Staff are the boots on the ground who make or hinder change. In my daily observation the lack of staff interaction with mid-level supervisors, especially in the Pods, compounds a prevalent issue and will impact future change. My report will reflect that I believe you have enough mid-level managers they simply need to be reassigned and more importantly trained on the jail's goals and objectives. They have to care, understand themselves, to educate the ranks to achieve success.

As stated with the current climate and evolution of our world, expectations, transparency, and accountabilities have been elevated by stakeholders. The days of our jails being a place to train employees to be patrolmen, to work one's last year before retirement, or a place to employ disgruntled and difficult employees is rapidly becoming an archived method of operations. If jails do not transition into a separate career pathway for detention professionals voluntarily, the courts of other branches of government will place them on that pathway. I believe the Oklahoma County Jail is on a pathway to success with the implementation of the Trust. The jail potentially creates the majority of county liability. A Trust frees the sheriff from that obligation to concentrate on community policing.

If your staff do not have **Measurable Policies** that specifically provide a clear path to accomplish their tasking, they will make up their own version on how to complete or whether to complete their tasking. Not only is the policy a necessity, but you must also train staff on what the policy states and requires. Inherently people are minimalist and often only do the bare minimum to get by or accomplish a task. Staff must be fed a consistent diet of what a policy states and requires. This can be done in multiple ways. Your supervisors are the driving force behind daily comprehension. It can be through reading and discussion at a briefing, one on one discussion by supervisors, policy audits for individual compliance, reading assignments followed by discussion, as just a few examples. When questioning staff, many did not comprehend their policies. When questioned how they learned their jobs, most indicated word of mouth from coworkers not supervisors. Most knew where to locate policy binders but did not know if they were current. Some had signed the document located in the binders acknowledging they read and understood the policy, but they were not confident in knowing or understood the content. The content

of the policies I reviewed (which were limited) lacked measurabilities that provide a simple step by step road map of directions to follow. Measurable policies need to provide what to do, how to accomplish the expectation or task, when it must be accomplished, who is to complete, who will monitor compliance, how it will be documented, and where the document will be turned in and archived.

Upon review of the **Training** curriculum provided for in-service and the initial academy it appears somewhat outdated and needs applicable or job-specific training. For example, if everyone needs to learn the new jail management system at a minimum it should be taught to all new hires and annually thereafter. I was not able to locate any specific mental health Correctional Crisis Intervention Training. It is well known by those who work in the detention field jails and prisons have unfortunately become the modern mental health facilities. We expect our staff to work with the mentally ill, but without training it becomes a liability for all. We would not allow an employee to operate a vehicle, the fingerprint system, etc. without a license or certificate of competency. Therefore, without proper training on working with the mentally ill, liabilities and potential litigation elevates. Excited Delirium events handled by untrained employees have cost lives and resulted in large settlements to governments and individuals across the nation. What is the jails definition of training? The National Institute of Corrections defines training as “*A formal exchange of job-related knowledge and/or skills from someone having it to someone needing it where something is required and applied resulting in something of value for the agency. If that exchange is thoughtfully planned, implemented and documented as training it can be defensible training*”. When all the following elements are clearly documented you have defensibly trained your staff.

1. It is based upon specific performance/intent, functional equivalent/content objectives.
2. It must be job-related statements of direct relevance to the jobs within the jail. Based upon problem solving, performance analyzing or job tasks for existing and new employees.
3. It must be from an appropriately trained source, with evidence of credentials, preparation, expertise, and proficiency.
4. It must be sufficient in time and duration to actually learn.
5. It must be reasonably related to the complexity and importance of the topic/lesson plan being taught.
6. When something is taught/learned/not learned, individual assessments of what the trainee learned, what was applied, what the trainee did not learn, whether the trainee needs remedial training again, what was done if the trainee fails to demonstrate efficiency.
7. Document the appropriate staff who were in attendance and testing by name/title/position who performed the task.

It has been documented that the current training programs at the jail do not meet the complete definition and litigable points presented above. In Attachment F you will see the training requirements as provided by the training department. Your training supervisor, Don Givins, I personally know has the capability to develop and implement a measurable training program. He will need specific criteria, deadlines, and allotted time frames. I continue to see detention training hours and programs across the nation declining even as accountability and litigation increase. That has been done because there seems to be perceived there are less staff to complete the daily task at hand. Which is accurate using the jail's current staffing model. So, the choice was made to keep the body on the job and forgo hands-on training, opting for online learning instead. It is my sincere opinion that this is the wrong approach unless a validated monitoring component is attached. Many employees simply check they have completed the training and close out the computerized lesson plan, while still on post. Worse, many employees do not have access to a computer on post, so it potentially creates an overtime issue for them to stay and complete the online training after normal work hours. So, by shortening the mandatory hours, relying on online training, not having knowledgeable mid-level supervisors teaching daily we subject our staff and

stakeholders to liability. With the adoption of the 1983 suits we further open staff up to personal liability for deliberate indifference because we document they were trained by pushing out online training but do not have a follow-up and monitoring system to insure they learned and more importantly learned the tasking which the training was designed to educate. It is a complicated dilemma that is correctable.

You cannot simply hire a person regardless of age, gender, culture, or economic base and swear the individual in as an officer. Then after that oath, expect them through osmosis to know how to work with the mentally ill, manipulative individuals, gender differences, understand the policies and procedure, etc. without quality training, that is continuous. While many of the topics are relevant, it is my recommendation that the training be updated including many job-related topics that will provide hands on skills and knowledge which develops abilities. C.C.I.T. (Corrections Crisis Intervention Training) provides employees an understanding of theory, knowledge to intervene, compassion and understanding and working confidence to assist such a complex detainee. Google "Excited Delirium" and review all the litigation caused by untrained staff or through deliberate indifference. The injection of 1983 actions into the litigation forefront, if added to the training curriculum, will provide motivation for employees to absorb the training better when taught.

The new jail management system appears to be an upgrade from what it replaced. The hiring of Kevin Marble as the Director of I.T. was a win for the Jail Trust. His skill set will prove to be an asset working with day-to-day troubleshooting and opening new features or operations within the system to better serve all. But the end user still must be knowledgeable in the system's capabilities and functions. Again, the only way to achieve proficiency is to use the system but first the employee has to be provided an understanding. What you have now is learned through word of mouth, trial and error... Word of mouth is a recognized method but on its own merits has been difficult to defend. In the detention field without multiple layers of documented measurable outcomes we are vulnerable.

Online training has its place but should not be your sole source of opportunity. Many times, we set expectations for our employees to follow and walk away because we set those expectations based on our own ethics and values. Our staff are individuals and often have developed different systems based on everything from culture, education, and even environmental influences. By simply throwing a bunch of training assignments online and telling staff to complete and understand that training is a recipe for failure. First, you are dealing with individuals who often read differently, understand meanings differently, and to reason they will comprehend the training identically is not possible if there is any complexity. For example, you could put "How to Conduct Count" online and the majority would comprehend. Everyone can count, if you do it at the same times every day, and practice the same routine, they get it especially if a supervisor counts with them every so often. However, if your training requires application, complex understanding or presents liability if not done correctly we are setting up our employees and ourselves for failure.

Among staff the consensus is "every issue that transpires in the jail can be traced to staff shortages". I found that to be 100% true among every staff member of the rank of captain to members of the academy class I met. That proves the jail training is contributing to the theory that the number one problem is directly caused by not enough staff. In my observation and professional opinion, the staffing numbers are as good as I have seen in Oklahoma. So, if you have ratios as good or greater than the state average; is it possible they are not being used in the most efficient roster scheme or posting available?

When looking at staffing there are instances where too many supervisors are present and you find, for lack of a better term, "empires" have been built throughout the jail. Areas become overtly focused on just one area or task and lose track of the common goal if everyone has the same set of "Goals and Objectives". This is something that evolves over a period, not a new development under the Trust's

tenure. It will however require their prompt attention. If provided, the documents on all the jail incidents in the last 12 months, it is my suspicion after observing operations that many could have been avoided or resolved if everyone in the jail had the same training and were not designated to specific tasks. For example, I tracked an inmate arriving from DOC on a writ by the name of Tony Wilcoxson from entry into the jail until placement in a cell. I started watching him in the Intake/Shakedown room at 0950 hours on 05-04-2-21. He saw the Intake medical provider at 1001 and taken to the Booking window at 1003. The Booking staff was having difficulty finding him in the system and believed it was due to someone attempting to transport him prior and did or did not do something in the system at that time, which is causing the problems. The inmate was moved to a bench and no further action was observed the rest of my time at the jail. I returned to the jail on 05-06-2021 and visited classification to find out when the inmate was Classified and placed in a cell. The Classification officer on duty at that time could not produce a current record. The only record they could produce was one from 2020 from a past booking. I found the inmates cell assignment and went to his cell. When questioned the inmate advised he had just arrived in the cell that morning 05-06-2021 around 1000 hours. If anyone is sleep deprived for that period how could your attitude and behavior not deteriorate? I watched as eight staff members were in the area as the detainee sat in the holding cell. I am not attempting to indicate they were all not busy, but each had their own task and, in my view, did not attempt to multi-task. In another instance there is an operation where a Lt. supervises one employee, and that employee was a Sgt. the day(s) I was present. Bonds is another example; it was split into multiple locations of operation. The day I shadowed them the Bonds officer completed the paperwork then took the inmate back to the intake area when there were 4 additional staff working in the lobby. With uniformed training one of those people could have escorted the non-violent surrendering person to the intake area delivering him to staff. Instead, what happened was the Bonds Officer took the inmate, leaving the Bonds window closed while they spent 45 minutes walking the inmate through shakedown, medical, prints, mugshot and then into a holding cell. This meant the Bonds window was closed while people were waiting to post and to get a detainee out of the jail. Delayed releases increase cost and liability. I continue to go back to the subject and only do so because I see it as this huge void of supervision and knowledge among the post. I also see the lack of sufficient decision makers instantly available across the post as a dangerous liability. There are many supervisors who work Monday-Friday on the day shift. While everyone wants those hours, their knowledge base needs to be utilized in directing and training staff in critical daily operations on all posts.

The staffing assigned to the jail on May 8, 2021, was as follows:

1. Administration	16
2. Clerical	104
3. Detention Captains	4
4. Detention Lt.	15
5. Detention Sgt.	21
6. Detention Cpl.	22
7. Detention Officers	115
8. Maintenance	16

9. Part Time	9
10. Investigators	3
Total	325

Of those employees, the below figures reflect by the day of the week what your staff coverage reflects minus the Platoons (who work a strange pattern of 4 days on and 4 days off). It would be to the Trust's advantage to compare all major incidents by day and times to establish if those incidents and staff on sight have any correlation. With there only being 7 days in a week, at glance it appears the Trust could be paying potentially approximately 89 days of unnecessary overtime weekly just to the platoons. That is a whole different subject I did not investigate due to time restraints on the 160-hour contract. There are 89 detention officers assigned to the 4 platoons and 88 detention officers assigned to other duties within the jail. Many of those positions could be covered by civilian staff with training and many of those officers reassigned to work in the Pods where many problems arise. You would still need officers for Intake and Booking, but your numbers in Pods would significantly improve. Twenty-eight officers plus relief it appears would allow you to cover all Pods if open. Those positions vacated could be filled with reclassified civilian employees currently at the jail with minimal training. One example could be your cleaning and grounds officers. They only supervise trusted inmates on work details. No Captains, your most knowledgeable Detention Officers work on platoons and only approximately half of the 15 Lt. works on Platoons who are over the Pods. You have "Unit Managers assigned to floors only during day shifts along with clerical support while you do not operate using a true Unit Management system. Those, in my opinion, are not necessary to jail operations. Those Detention Officers could be reassigned across the platoons to provide mid-level supervision or fill vacant positions. Medical officers, I will further address in a following section, need to be reduced and reassigned to Pods. By reducing them at a minimum by half you could occupy 4-5 vacant Pods. The inmates could then be treated more in the pods for sick calls, chronic care, etc. The officers simply assigned to lockdown the Pod and accompany or escort the Qualified Medical Professional from cell to cell. Most routine treatments can be accomplished through the bean hole. If a bean hole is not present, the inmate can be removed from the cell. I believe your vendor will support me in saying this does not create a H.I.P.P.A. problem and will increase productivity while providing a better continuity of care.

As you can see these figures show by day of the week the numbers of staff off each day minus Platoons and medical. As stated, these numbers are in constant fluctuation due to terminations and new hires.

Saturday	172
Sunday	176
Monday	33
Tuesday	14
Wednesday	21
Thursday	21
Friday	30

When looking at the classification process in the Oklahoma County Jail I find with all jails the classification system is an old system that relies heavily on the opinion of an individual. That individual is usually an entry level or lower ranked employee. That in addition to the computer-based program they implement an assortment of unofficial classification steps. When questioned why those steps were implemented, none could articulate why they were doing it or who even initiated the steps. For example, as informed, everyone classified at Oklahoma County who has an offense involving a child goes directly to protective custody. That is done without impute from the detainee. This person has not yet been convicted of a crime, just arrested. Gangs are separated and, in my experience, create additional problems. Balance of power or balance of enemy often creates neutrality or an unsteady peace. The best example I can provide is the Cold War. Both the U.S.A. and Russia had sufficient fire power to erase mankind but, by each knowing that, treaties were formed. If booked with a bond in place often, there is evidence no classification was completed. When classification systems often rely on history data is lost. Some bypass classification without explanation. The classification officers I had discussions with indicated they "only classify who is brought to them". This is another example of the "empires" that have been built over the jail's existence. Classification Officers need to be retrieving all booking files instantly once mug shots and prints are completed. Then moved to an assigned cell without delay. The current method of classification creates secondary problems. By classifying using some of the additional what I call "that's just the way we do it steps" you create staffing problems. There were multiple open bunks and even cells throughout the jail created by this operational method. There are people assigned 3 to a cell designed for 2 and sleeping on the floor. That practice in my opinion creates unnecessary stress on the environment. While I have not measured the cell square footage it should be reviewed for compliance to Oklahoma Jail Standards. You may want to explore adopting a first available housing system. The landmark Oklahoma case on conditions of confinement to include celling can be found in *Battles-vs-Anderson* and *Saffle-vs-Williams*. While you have people classified as maximum security there is no difference in how the Pods, and the majority of the cells look. Many jail management systems offer some sort of classification system, but the quality is usually only as good as the end user. By simply change or eliminating many or all the self-imposed criteria from the classification system you could potentially shut down Pod(s), eliminate triple celling which is a potential conditions of confinement liability. Not to mention you could reassign staff to provide high traffic or problematic areas in the jail. For detainees who create a management problem a more comprehensive Restrictive Housing policy should be developed.

I cannot effectively address the need for improving the classification system without first clarifying my prior point that staffing is not being utilized effectively. In this section I will address the Intake/Booking area as it is currently operated. The area is poorly designed which compounds the operations and flow of the jail. It delays bonds and release. Transports to and from hearings. It creates lost or misplaced property. It delays assigning individuals to cells. It delays officers from returning to the streets of their communities, having the potential to affect overall community safety. The flow of the area is so congested and confined it effects cooperation and frankly increases the stress levels of all who enter the area. The noise level alone is not conducive to one's behavioral effectiveness. There are detainees on benches, some restrained, some not restrained. All it takes is one unrestrained combatant to attack a defenseless restrained inmate to generate litigation. I am not an advocate of restraining everyone, but I do believe you have to have separate areas of confinement. It is much easier to defend any litigation if you have a system that can be articulated. All documented or obvious dangerous people must have a defined policy/process while all unrestrained detainees' process should differ, and both are articulated in a policy. As a whole, people act out less when they have something to lose; being restrained, even in jail, is a loss. Unique or not, those incidents are where supervisors come into play. When decisions outside of

the measurable outcome-based policies are not present, this area is one that must be labeled priority for corrective measures.

In this report I will provide two, separate low-cost solutions that should be considered simultaneously for implementation. If nothing else is taken from this report these two-priority corrective measures will increase productivity substantially. These recommendations completely do away with your current staffing rosters and unify staffing into seven-day and five-day shifts or post assignments. Seven-day shift or post assignments require relief and five-day post do not. In this report I will provide you with a roster that is simple to implement and will increase your available on-site numbers and reduce cost. The second is a remodeling/relocate plan will assure an increase in productivity of the intake/booking operation and provide a better a manageable open concept, increase stakeholder service and reduce liability. As the report progresses, I will provide details.

The corrective action recommended for relocating and remodeling of the intake/booking area will provide the cornerstone for effectively redefining and streamlining the jail's efficiency. Attachments A, the current As Built for the ground floor of the jail and Attachment B the ruff design incorporating potential changes. These visual aids will hopefully provide you with a tool to follow this report. As a disclaimer I have ZERO formal training in architectural drawing. What I do offer is 38 years of detention experience which includes multiple remodels and building constructions within my career. To put Attachment B into a narrative we will be talking about the S.E. quadrant of the jail's ground floor. In my review of the area, I find this is a vacant virtually unused area which has been turned into a large storage closet. While this quadrant of the jail has multiple rooms/offices, in reality it is approximately ¼ of the ground floor divided with hollow sheetrock walls that appear to provide no load-bearing support. In simple terms every interior wall can be removed, opening the area into a single room that would account for approximately ¼ of the floor. The area could be easily redesigned and hardened for security with a fraction of the cost a new add-on construction would. Attachment C will provide an option for hardening the room. By relocating the intake/booking it would be a catalyst for change that includes **Initiate New Staffing Patterns, Ignite Cultural Change, Enhance Continuity of Care, Reduce Liabilities for the Customer Base and put Patrol Officers back on the street faster.** I will define each of those in detail for you.

One of the common terms or themes when discussing the Oklahoma County Jail is "understaffing". The term has been used and blamed for years on a multitude of events. The truth is an ideal staffing pattern would be 1 Officer per detainee, but where are you going to find that many people to work and who is going to pay for them. So, eliminating that perfect scenario where do we go, we better utilize the people we have in place and will hire in the future? The employees at the jail only understand staffing as presented; they have not been exposed to other models. The second most popular answer when asked is "That's just the way we do it, I am not sure why though". This is a perfect example of how loyal and dedicated many of your employees are; they simply ride for the brand. It is my opinion all recruitment efforts should remain. However, a new roster system must be implemented. Over the span of multiple elected officials' tenure, it appears the jail has not had a defined detention career pathway established. With an outsider's view it appears there have been accommodations made, positions created, and even operations established without creating specific job titles and duty descriptions. You were either a Deputy, which is not a great need in a detention setting, a Detention Officer, or Clerical served as a catch-all for everything else. The jail is heavily skewed with employees whose duties could easily be redistributed and not burden the employees who received that additional tasking. Those employees' job titles could be reassigned, reclassified, provided additional training, and fill the ranks of detention officers. For example, the jail has 102 classified clerical staff many who are called "Housing Monitors". Those employees conduct tasks as a detention officer yet have no detainee contact. So, they sit in a

control room with the primary task of observing empty Pod dayrooms for much of their shift. I do not mean to indicate they do nothing else because that would be untrue. They do log activities, open electric doors, and answer phones. The door could be controlled by Central Control though. A significant future if not past problem with these positions' capabilities is, they do not have the proper training to perform detention officer's duties. They cannot react to emergencies other than calling someone who might not even be on the same floor. When the inmates are out in the dayroom and incidents begin to develop again, they are not trained to detect, nor can they intervene. Most incidents are deterred simply by an officer present. One fear is if staff are reclassified and offered retraining, they will quit. There is some truth in that thought. But there is a responsibility to the customer base whether it be the citizens of Oklahoma County or the detainees residing in the jail to provide accountable and effective services. Accountable and effective service, while broad, can be focused on enhanced tasking, conditions of confinement, transparency, and fiscal responsibility. While I simplified the terms, I have witnessed the process. Within a year of the transition and reclassification it will be standard operations. Those in clerical positions working outside the scope of that job class or description should not be addressed with a reduction in force. They should be offered the opportunity to retrain as Detention Officers which is a position the jail needs. Most are functioning in part in that role now.

I have provided Attachment D to this report which is a staffing roster recognized as an industry standard and endorsed by the National Institute of Corrections. It is also familiar to your Jail management. The new employees know no other operating methods. The clerical "Housing Monitor" is just the easiest position to point out, but there are many. The same can be said about detention officers occupying positions that could be managed by civilian clerks or clerical staff. The Bonds area is a great beginning. Currently you have multiple areas to pay Bonds. There is no explainable reasoning to support the theory that surety and cash bonds need to remain separate; they serve the same customer base. When determining the reasoning they are separate, the consensus was "because someone in the past stole the cash, so it was separated". I have difficulty seeing that title changes or location change is a method of keeping someone's ethics monitored. There are statutes that are enforced daily at the jail which address violations of the law. Having duplicate employees completing the same task as provided in this example are in many of the jail's workstations. That method of management is inefficient and financially unjustified. I believe to enhance productivity, many areas within the jail should be combined or eliminated, changed from civilian to officer and vice versa from officer to civilian oversight. Again, this should be done by offering job reclassification, the necessary training and any salary increase to coincide with the new job family. Attachment E will provide you a quick reference to the staffing numbers/patterns on May 04, 2021, which are significant in showing that the jail has sufficient employees to effectively operate if placed in the necessary positions.

This report is not all-encompassing of the system within the jail that needs prompt modifications in my opinion. The goal of everyone is to "Protect" whether they work as a Trust Member or employee. That is done in many phases not just to keep the detainee safe from each other. To "Protect" begins at just that, protecting individuals from predation, but goes way beyond that simple understanding by most. You also have to protect the detainee from self-harm. You protect the employees with current measurable policies, the tools and equipment they need to complete their task. You protect the citizen taxpayer by managing the resources they provide to you. You train on and follow your measurable policies, you require supervisors to supervise troops on the front line, you have employees addressing conditions of confinement and quality of life for those who enter. When you combine all these with follow-up and monitoring liabilities, litigation is limited, therefore "Protecting" all. As long as the courthouse doors

remain open you will not stop litigation from being filed. What you will do is render those actions frivolous if measurable outcome systems are in place which includes routine follow-up and monitoring. The remainder of this report I have listed areas I believe without modification will delay the jail's evolution and hold some liability. Time restrictions to my contract focused most of that time on where I believed the impact of corrective action would be the most effective and rapidly obtained. I targeted the majority of efforts on staffing patterns and the Intake/Classification area unfortunately. I do however want to ensure that my other observations are passed on to the Trust Authority to address as they see fit. I highly recommend that your efforts to identify areas in need of corrective action are continued. As stated, prior your Jail Administrator while capable can only dedicate a portion of his time identifying, drafting corrected action plans, selling the change to staff, and then implementing the corrections or changes. He will eventually get you to a better operating jail with adequate time. You have a decision on whether the jail has the time to allot or if additional boost or assist needed interjected. Regardless of your approach there should be an additional process whether internal or external identifying areas and systems that pose any condition of confinement issue, quality of life issue or a hazard to the jail. The jail is a large and unique operation that requires a skill set that matches. It has been an honor to assist. The following are areas of concern I saw but are by no means inclusive.

Lockdowns

The jail's lock-down patterns are sporadic and implemented without any measurability. Attachment G contains multiple documents on why the lockdown method of confinement is counterproductive. I encourage everyone to Google and watch the documentary on the Stanford Study. Without spoiling the show, it divides a class into two groups: law enforcers and inmates. The experiment is very eye opening as a behavioral study. The days of running just a lockdown facility have passed. A modern facility that stays out of the courts must be multi-faceted. Modern jails address Mental Health housing, Restrictive housing, Juvenile housing, Maternity housing, Infirm housing, Veteran housing, LGBTQ+ housing, Protective housing, Detox housing all with measurable systems ensuring safety, security, programs, and treatment, with policy requirements as a beginning. I hear the term Direct Supervision being used frequently around the jail. You first must define "Direct Supervision" as it can be applied in the jail. Can the Federal Minimum model we often call a country club be introduced, of course not, but you can apply some theories? The hardest part of any change is getting started. A plan to start with implementation dates needs to be developed to "Get Started" on redefining Pod movement and out-of-cell time. Starting with one Pod or one Pod on each floor would be an acceptable starting point. It is my opinion if you do not develop a plan and get it implemented, there is a potential one that will be developed for the jail. I highly encourage that a plan be developed and implemented soon.

Vermin

Throughout my tours of the Housing Pods there was evidence of Bed Bugs along with other pests. In discussion with Jail Administrator Williams, I know he is developing a plan to implement a heat treatment to eradicate bugs and larval eggs. I witnessed detainees without a mattress or portable bunks. When questioning the detainees about the reasoning behind them not having either a mattress or portable bunk, the reply was unanimous. They choose not to have either because the bugs used them for shelter. If they laid on them singularly or in tandem the bugs were more present than not having one. This is a quality of life and condition of confinement problem. While a solution is being developed, urgency should be applied. Spraying eliminates some of the live bugs but has little to no effect on the

encased larva. Stopping the bugs from entry should be the goal in order to allow eradication inside the jail to be planned. In this report I will be providing a potential low-cost remodel Att. _____ where dress in and dress out of detainees could be added in the proposed remodel should impact entry. The medical contractor will have to also act as a key component of monitoring and compliance as well. Detainees with evidence of infestation can be treated prior to housing. Mattresses and portable bunks can easily be heat treated without much expense, which would provide a small stop-gap treatment in the jail, further developed by Jail Administrator Williams.

Medical

(Jail Standard) The current location and operation within the jail limit your continuity of care and contribute to cost. In Attachment B I have proposed a low-cost renovation that could relocate the jail's medical operation to the first floor. The lack of a quality pre-booking screening creates a huge liability for the jail and does not "Protect" the detainee, the staff, or the Citizen because it will allow individuals into the jail who should be diverted to a hospital for specialized care. The jail's vendor has a good record for providing quality health care but neither them nor the jail should be considered a hospital. Relocation of the pre-booking clinic to outside the secure interior of the jail keeps the liability and responsibility of care on the individual or arresting agency, not the Trust and the citizens it represents. The utilization of Officers in Medical is not the most effective method of Operations. There appears to be medical decisions being made by supervisors based on disagreements or what they believe is a staff shortage. Individuals on chronic care who cannot provide for themselves. Lives often depend on consistent and timely care. In Attachment D you will find my recommended roster for the jail. If implemented, it will help improve the effectiveness of the continuity of care the vendor can provide, and limit unnecessary liabilities. The 13th floor could be transitioned into a stand-alone Mental Health Unit or closed with the suggested new approach to classification. The different Pods can be separated into care levels based on decompensation, medication compliance, treatments, therapy, etc... Again, at minimal cost or physical plant change. cost.

Property Storage

The property room and the way property gets to the room creates potential for misplacement. The intake area and the property room are not geographically close. I have witnessed detainee property which has remained in the intake/shakedown area for extended periods of time unattended. Once the property has been delivered to the property room to a warehousing system I can only define it as manual. The bags of various shapes and conditions are carried or elevated into a sub-basement area that is wet at times. At no point was a locking device observed adhered in the Intake search area that I observed. While not an environmental expert I do have some questions concerning air quality of the area and if there are some air quality and possible confined space concerns along with other standards. I have presented a possible relocation of the area in Attachment B of this report. If the Trust adopts my recommendation an automated computerized storage system could be added to make the area more efficient and reduce tort claims against property loss. There are multiple automated systems on the market. I have included a rail system similar to those used in other jails and commercial operations in Attachment H.

Breaks

When interviewed, many staff assigned to a Pod indicated they rarely got to take a break. I have viewed many of the same employees on break who are not confined to a Pod, however. This may be an area for review for consistency. Some staff indicated it contributed to the overall workplace environment. The Fair Labor Standards provide a validated guideline.

Leisure Items

There were occasions when touring areas of the jail employees were occupied with items that potentially could divert their attention from observing the jail's environment. Books, puzzles, cellular phones, and artwork are some examples. On the best of days, a detention facility requires all who enter to be vigilant. Anything less could create a doubt whether deliberate indifference was present in the event an incident does transpire in an area where staff were occupied doing tasks other than their defined duties.

Job Descriptions

In review, the jail has two main job categories: Detention Officer and Clerical. I know Jail Administrator Williams is currently addressing this deficiency so I will only briefly mention my findings. If a challenge arises out of litigation this has the likelihood of being problematic in my opinion. I would recommend prompt attention and resources be given to correcting this area. There are many employees as stated in the body of this report that require a defined Job description that is measurable. It is difficult at best to hold an employee to a standard when the standard only exists verbally. Again, I refer you to the Clerical/Housing Monitors referenced prior. Nowhere in that job description does it require inmate supervision or monitoring.

Attorney Visitation

The jail's current practice on attorney client visitation is very staff intensive and unnecessary. You have attorneys who if they are not billing are not making money sitting, waiting on Detention Officers to stop what they are doing. Their tasking is equally if not more important to the jail's operations. That practice can be stopped and still allow the attorney and their clients all the rights afforded by law. You accomplish that in a combination of three ways. The least evasive solution is to require the attorney to travel to the floor where their client is housed for the visit, unescorted. There are sufficient rooms designed for and known as the "Attorney visitation rooms" on each floor being used as storage. Clean those rooms and reopen them after you send notification through the local and state Bar Association of the change. Attorneys are licensed and even bonded in some instances. Provide them with the rules and it has been my experience they will follow the guidance. If they fail to follow or introduce contraband, bar them from entry, file a Bar ethics complaint, or file charges. The courts have stated that all is required is access to representation and that can be done via the U.S. mail if the Attorney chooses not to visit on the floors. Option two is to require your telephone vendor to block any attorney telephone number from being recorded when requested in writing. The jail can even draft a file in the blank template for use. Vendors have the capability of blocking recordings and can even set a purge date and annual renewals. Once the

Bar number is verified you have a telephone vendor representative on sight who can add or delete instantly. If your vendor denies the capability, send it out for rebid. Option 3 is the legal mail system as stated. But if you implement all three you will find all stakeholders are the beneficiaries.

Policy Knowledge and Understanding

When interviewed, staff had difficulty articulating what the policies require. Most knew where to find them but lacked comprehensive understanding. You can have the best measurable outcome-based policies written, but they are only as good as the knowledge of the person implementing them. The adage “you can take a horse to water, but you can’t make him drink” is not acceptable in the detention industry. You must also teach him how to drink and document what you taught him. The training on policy comprehension should be elevated to the importance of reviewing and updating policy. Computer-based training without follow up and monitoring, allows the employee to choose whether they read and understand. That approach will prove liable in the future. I believe it must become a priority for correction.

Cell Checks

Oklahoma Jail Standards and a multitude of others require inmates are seen in and that observation documented to ensure safety and security. That requirement is not taking place consistently in the jail. While there is a system in place the documentation cannot be produced. The “wand” system in place allows an officer to go cell to cell including holding areas and place the Proximity Reader or “Wand” into a slot for recorded checks of the occupant(s) of the cell. First the receptacle mounted on the door is in such a location the user can simply insert the “Wand” without ever looking into the cell window. Second, the system has non-functioning components. If one part, section, relay etc. is not functioning you have a false sense of protection or accountability. If these checks have not been a factor in litigation, they will be eventually. This is a relatively easy fix by adding training, wording changes to policy, and mid-level supervisor follow-up and monitoring.

In conclusion, I offer the following recommended corrective measures for the Oklahoma County Jail Trust for consideration. With my expertise in the detention field, I know these suggested actions will improve the systems and operations of the Oklahoma County Jail. It has been an honor to assist and in closing please know I am ready to provide consultation again in the future.

1. Relocate Intake/Booking to S.E. quadrant of the jail's ground floor.
2. Combine all Bond areas into a single operation.
3. Combine Bonds and Release into a unified operation ran by civilians under the shift/platoon leader's supervision.
4. Relocate Bonds and Release to the S.E. quadrant of the jail's ground floor. This will provide a smoother transition, provide a better service to stakeholders by reducing wait times, and provide an efficient use of staff time.
5. Eliminate all “Empires”/specialty jobs and make retraining available to all those staff. Unify working environment where all staff working an area has documented cross training on each function. One

example is "Booking". Staff assigned there can perform every task whether it be receiving, searches, intake, prints, mugshots, escorts, classification, etc. This not only helps with call-ins which creates shortages, but it further enhances the jails overall efficiency. It should not take over a couple hours to process, release or house a detainee.

6. Load your unified shifts with supervisors. Their expertise and decision-making skills are invaluable and there needs to be an enhanced presents on the floors.
7. Move all the property money kiosks into the newly designed intake/booking area and make the arresting agency feed all currency into the machine. This eliminates the exchange/handling of cash for officers.
8. Move the medical vendor to the area vacated by Intake/Booking. The area is equipped with cell offices, an area for treatment rooms and a holding area for patients. Minor placement of doors in hallways and adjustments with equipment will be required at low cost. Any electrical equipment, cabling etc. is easily accessible through the basement upward or through mechanical closets/chases.
9. Turn Floor 13 into a mental health facility. This would elevate the continuity of care and programing.
10. Insist that no jail employees other than the administrator direct medical treatment in any form unless the have a medical license and coordinate with your vendor first. This include annexing a cell designed for medical use to house difficult detainees.
11. After modification to the new medical area, holding cells will be available for court transports as individual areas. This will eliminate interaction with intake and medical inmates, while making the process more efficient.
12. The medical initial review must be moved outside the secure Intake/Booking area. The rough design Attachment B reflects a suggested location. It is vital a medical review is completed prior to entry to ensure liabilities remain with the arresting agency until cleared medically for entry.
13. Realignment of positions. The jail has too many employees assigned to job classifications that do not meet operational needs. This is a product of multiple administrations and "Empire Building". Job titles need to be eliminated, and staff should be offered new positions that will advance the jail's mission, along with the retraining necessary to complete their new assignments.
14. A new manning roster is necessary. The multiple rosters currently in place are costly and do not meet the jail's operational needs. I have provided a new roster system in Attachment D.
15. A new measurable Classification system is warranted which meets the jail's needs. Your IT manager has the skills to complete that task. The system as being utilized is sporadic, has too many add-ons that no longer make sense (separation by gangs, automatic protective custodies without detainee's request, various crimes, etc.) which increases operations cost, triple celling, delays in release and even instances where the process is skipped. Attachment I from NIC will provide guidelines.
16. Releasing detainees from lockdowns. Inmates are kept in their cells days at a time based on old philosophy, blamed on staffing levels and in violation of many standards.
17. Transparency will show your progress. Feed the press and public. When they do not know, they take whatever available source is out there. True there are fiction writers out who if the truth is boring, they will inject sensation, but most are credits to their profession. Call out the fiction writers and feed the professionals. I recommend you feed them daily.
18. Training you must provide measurable, applicable training that instills job knowledge on the employee. You do not want them making their tasks up as they go along. That is a fool proof method for disaster and big payouts. Your current training is not sufficient in time, content, or delivery.
19. Require Supervisory to take additional training in leadership and management. We should never stop learning because our industry is under constant evolution for the better. Most changes are

driven by others error discovered through litigation. I know I have expressed my concerns for the lack of accountability with online training within this report. Having said that The National Institute of Corrections (N.I.C.) has a vast library of online leadership and management training that require testing as a monitor.

20. Policy can only be measured one way; do they provide in detail the duty/requirements the employee(s) must know to complete their tasking requirements. They further must contain detailed specifics on time, frequency, recording/documentation requirements and who will monitor compliance of the requirements. Without a detailed road map or recipe your policies are incomplete and will be used against you in the courts.
21. A decision should be made whether to continue providing external support to enhance the operational systems and cultural change at the jail. Managing a system changes will be difficult for any new administration as they simultaneously concentrate on changing a work forces culture. Change is difficult for most to except, and they tend to direct frustration and anger towards those in leadership. While operational systems and cultural changes both have to occur the first person driving that change often has difficulty. By having one source delivering the change and a second source going through the change as employees, more time can be spent on educating and supporting the ranks in the cultural change that is required to implement the new systems.
22. Develop a long-range plan that addresses hardening of cell walls. That maybe filling cinder blocks with concrete, adding an insert, removing walls to create open bay Pods, etc... The quickest win though is cell inspections during 30-minute checks by officers assigned to individual Pods if a new staffing roster is implemented. The current proximity reader being used may not be providing the needed coverage or documentation necessary. An increase in the amount of out of cell time will decrease cell vandalism. It will not stop the vandalism, but it will reduce the amount, which reduces the operational cost.
23. Enhance auditing for compliance both internally and externally. You have staff assigned and with clear sets of measurable policy requirements, documentation and corrective action reports, operational improvement will follow. Which in turn helps ensure due diligence is met along with all external standards and preparation for defending litigation.
24. Eliminate all forms that are not in a policy. There are dozens of forms that differ even between operations. Forms are great tools but if they don't follow policy or add addition requirements, they make you indifferent and not within compliance to your own policy and procedures.
25. Provide greater employment access to detainees. Sanitation level can be improved if more detainees are out of their cells working. Many have court cost or fines to work off. If they are not working, then they are adding days and liability to the time in the jail.
26. The availability of cleaning supplies and out of cell time will increase overall sanitation in each cell.
27. Hard bound paper