

January 5, 2016

Sheriff Michael Simpson  
Preble County Jail  
1139 Preble Drive  
Eaton, Ohio 45320

RE: 2015 Annual Jail Inspection

Sheriff Simpson:

In accordance with Section 5120.10 of the Ohio Revised Code and Executive Order 92-03 of the Department of Rehabilitation and Correction, the Preble County Jail, a full-service jail, was inspected on December 14-15, 2015. The inspection was restricted to assessing compliance with a group of one hundred and seventeen (117) standards, selected from the Standards for Jails in Ohio promulgated by the Department of Rehabilitation and Correction. The group of standards being inspected focused on reception, classification, security, housing, sanitation and environmental conditions, communication, visitation, medical, food service, recreation, inmate discipline, administrative segregation, grievance, staffing, and staff training. The inspection consisted of this Inspector receiving and/or reviewing requested documentation and/or materials, observations made while touring selected areas of the jail, and interviews with your staff.

The total actual general housing capacity for the Preble County Jail is (85), consisting of (60) adult males and (10) adult females, (4) mixed (either adult males or adult females), (10) Holding, and (1) special housing beds. On the date of the jail inspection, there were (51) inmates incarcerated in the Preble County. The Ohio Department of Rehabilitation and Correction recommended housing capacity for the jail is (70), which is based upon total available living space and other requirements. Officials should maintain prisoner counts within the Department's recommended capacity figure.

The Preble County Jail (FS) is in compliance with the following standards:

5120:1-8-01(A)(1); -01(A)(3); -01(A)(4); -01(A)(7); -01(A)(9); -01(A)(12); -02(B)(1); -02(B)(2); -02(B)(4); -02(D); 03(A)(1); -03(A)(2); -03(A)(3); -03(A)(4); -03(A)(5); -03(A)(6); -03(A)(7); -03(B)(2); -03(B)(4); -03(B)(5); -03(B)(6); -03(B)(7); -03(B)(9); -03(B)(10)(a); -03(B)(10)(b); -03(B)(10)(c); -03(B)(10)(d); -03(B)(11)(b); -03(B)(11)(c); -03(B)(15); -04(A)(4); -04(B); -04(D); -04(F); -04(G); -04(J); -04(K); -05(A); -05(B); -05(C); -05(E); -05(G)(1); -05(G)(2); -05(H)(3); -05(I); -05(J); -05(L); -05(O); -05(P); -05(Q); -06(B); -06(C); -06(E); -06(G); -07(A); -07(D); -07(E); -07(H); -07(I); -09(D); -09(E); -09(G); -09(H); -09(U); -09(X); -10(A); -10(B); -10(C); -10(D); -10(G)(1); -10(G)(2); -11(A); -11(B); -11(E); -12(B); -12(C); -12(F); -12(G); -12(H); -15(B); -15(D); -15(E); -16(A); -17(E); -17(F); -17(G).

The Preble County Jail did not comply with (31) of the standards upon which the facility was inspected. This letter is intended to serve as a basis for developing plans of action for bringing the facility into compliance with the deficiencies noted during the inspection.

5120:1-8-03(B)(8) (Important): Each full-service jail shall have written policies, procedures and practices to ensure special needs inmates are recognized and that the jail addresses the management of those inmates with special needs. The jail currently has no policy to specifically cover the management of special needs inmates.

5120:1-8-03(B)(12)(Important): Each full-service jail shall have written policies, procedures and practices which evidence, that the following minimum standards are maintained: Inmate movement from one area to another is controlled by staff. The jail currently does not have a written policy to govern the control of inmate movement.

5120:1-8-03(B)(16)(Important): Each full-service jail shall have written policies, procedures and practices which evidence, that the following minimum standards are maintained: keys, tools, and culinary equipment are inventoried and use is controlled. The policy needs updated to reflect all the requirements of the standard. The jail needs to review procedures for the system for key issue and return for documenting the accountability of keys. There are numerous tools stored on site in a secure room inside of the secure jail. However, there is no system of accountability for any tools. At the time of inspection, culinary tools and equipment in the food service area were not maintained in a secure manner and no system of accountability is being conducted.

5120:1-8-03(B)(17)(a)(Important): Each full-service jail shall have written policies, procedures and practices to ensure toxic, corrosive and flammable substances shall be stored in a secure area and used by inmates only under direct supervision and used only according to manufactures' instruction. The substances must only be accessible to authorized persons. The jail does not have a solid practice for the proper storage and accountability of toxic or flammable substances. Additionally, the policy needs to identify the storage area to be utilized for these materials. At the time of inspection, numerous toxic, caustic, and flammable substances were observed to be unsecure, unaccounted for, and no SDS was available for the chemical products.

5120:1-8-04(C)(Important): Each full-service jail shall ensure single cells/rooms and multiple occupancy cells/rooms/dormitories shall have an air circulation of fifteen cubic feet of outside or recirculated filtered air per minute per occupant or as required by the local authority having jurisdiction. Documentation from a qualified source shall be maintained by the jail. The jail does not have documentation from a qualified source showing adherence to this standard.

5120:1-8-04(E)(Important): Sanitation facilities shall include access to an operable flush toilet and lavatory with hot and cold potable water on a twenty-four hour a day basis without staff assistance. At the time of inspection numerous lavatories throughout most units were not operating properly.

5120:1-8-04(H)(Important): One operable wash basin with hot and cold potable water for every twelve occupants. The facility could not meet the 12:1 ratio with numerous wash basins not operating properly.

5120:1-8-05(K)(Important): Each full-service jail shall ensure that shaving equipment and supplies shall be made available daily. Issuance and retrieval of all shaving equipment and supplies shall be documented. The jail did not provide documentation to illustrate the issue/retrieval of shaving equipment. Shaving equipment is only provided three (3) times per week.

5120:1-8-05(M)(Essential): The jail shall have a written fire safety plan approved by the local fire officials, and that is reviewed annually and updated as needed. The plan shall include fire prevention, training and drills, fire response and post-fire documentation and review. A current copy of the plan shall be maintained

at the local fire department. The jail's written fire safety plan was issued to the local fire officials on the last day of the inspection. The local plan has not been reviewed or updated annually as required by the standard.

5120:1-8-05(N)(Important): Each full-service jail shall ensure training in jail fire safety equipment shall be conducted annually. Training shall be provided on jail fire safety equipment for all jail staff. This training shall occur annually and be documented in the jail staff training records. The jail maintained no documentation supporting the practice or to evidence the training had occurred.

5120:1-8-09(B)(Essential): Health Authority. The jail has a designated health authority with the responsibility for health and/or mental health care services pursuant to a written agreement, contract, or job description. The health authority and/or written agreement for services does not provide for mental health care services.

5120:1-8-09(B)(Essential): Inmate Pre-screen. Before acceptance into jail, health-trained personnel shall inquire about, but not limited to the following conditions and the health authority shall develop policies for the acceptance or denial of admission for: suicide thoughts/plan; current serious or potentially serious medical or mental health issues needing immediate attention; the use of taser, pepper spray, or other less than lethal use of force during arrest. Training records of employees conducting the inmate pre-screen was not available to verify they are health trained. The jail policy does not support compliance with the conditions of acceptance and denial.

5120:1-8-09(C)(Essential): Each full-service jail shall ensure jail staff have completed training in conducting the receiving screening. The documentation needs to be maintained by the jail to verify the staff members are health trained. No training records were provided at the time of the inspection that documented jail staff have completed the receiving screening training. Further, the health screen utilized at the jail does screen for item C. 2. C. Conditions of skin i.e. trauma, rashes, infestations, needle marks, etc.

5120:1-8-09(F)(Essential): Sick Call. A Physician and/or qualified healthcare professional conducts sick call three times per week. The jail has an average daily population of 53.8 and only conducts sick call one time per week.

5120:1-8-09(J)(Essential): Each full-service jail shall have written policies, procedures and practices that address medical and mental health records. The jail shall maintain an accurate health/ mental health record in written or electronic format. The health authority shall develop policies and procedures concerning the following areas: (1) Health records remain confidential and are only accessible to personnel designated by the health authority, (2) Correctional Staff may be advised of inmates' health/ mental health status only to preserve the health and safety of the inmate, other inmates, jail staff and in accordance with state and federal laws, (3) Retention and reactivation of said records if an inmate returns to the facility, (4) Transfer of medical/ mental health information or record to external care provider. The policy needs to be reviewed and updated to include all the elements to be in compliance with this standard.

5120:1-8-09(K)(Essential): Each full-service jail shall have written policies, procedures and practices to ensure pharmaceuticals are managed in accordance with policies and procedures approved by the health authority and in compliance with state and federal laws. The policies must require dispensing and administering prescribed medications by health-trained personnel or professionally trained personnel, adequate management of controlled medications, and provisions of medication to inmates in special management units. Steps must be taken to ensure that the jail staff has received training in the proper management of pharmaceuticals. During the inspection, the jail was not able to provide an updated policies



(last reviewed 8/12/2003), training records or other documentation supporting compliance with this standard.

5120:1-8-09(M)(Essential): Each full-service jail shall have written policies, procedures and practices to ensure inmates who are evidencing signs of mental illness or developmental disability shall be referred immediately to qualified mental health personnel. The health authority shall develop and approve policies for the following areas: (1) Screening for mental health problems, (2) Referral to outpatient services, including psychiatric care, (3) Crisis intervention and management of acute psychiatric episodes, (4) Stabilization of the mentally ill and prevention of psychiatric deterioration in the jail, (5) referral and admission to inpatient facilities, (6) informed consent. During the inspection, the jail was not able to provide any policies or other documentation showing compliance with the requirements of this standard.

5120:1-8-09(N)(Essential): Each full-service jail shall have a suicide prevention program. The health authority shall have a plan for identifying and responding to suicidal and potentially suicidal inmates. The components shall include: Identification, Training, Assessment, Housing, Monitoring, Referral, Communication, Intervention, Notification, Reporting, Review, and Critical Incident debriefing. The suicide prevention program must be approved by a mental health professional and /or the jails health authority. During the inspection, the jail was not able to produce an updated policy or training records demonstrating compliance with this standard.

5120:1-8-09(P)(Essential): Each full-service jail shall have written policies, procedures and practices that establish an infectious disease program. The health authority shall have a written infectious disease control program which collaborates with the local health department and shall include, at minimum, an exposure control plan and standard isolation precautions for inmates and staff, which are updated annually. During the inspection, the jail was not able to produce any documentation, updated policies, or records demonstrating compliance with this standard. Further, the outdated policy providing direction on the use of an N-95 tight fitting negative pressure air purifying respirator is not compliant with 29 CFR 1910.134.

5120:1-8-09(Q)(Essential): Each full-service jail shall ensure pregnant inmates shall receive appropriate and timely pre-natal care, delivery and postpartum care, as determined by the health authority. At the time of the inspection, the jail was not able to produce an updated policy, procedure or documentation supporting compliance with this standard.

5120:1-8-09(R)(Essential): Each full-service jail shall have written policies, procedures and practices to ensure the use of restraints for medical and psychiatric purposes shall be applied in accordance in policies and procedures approved by the health authority. At the time of the inspection, the jail policy regarding medical restraint was not inclusive of all the standard elements and has not been approved by the health authority.

5120:1-8-09(V)(Essential): Each full-service jail shall ensure inmate diets are modified when ordered by the appropriate licensed individual to meet specific requirements related to the clinical conditions. The jail utilizes a nurse to modify dietary orders.

5120:1-8-09(W)(Essential): Each full-service jail shall have written policies, procedures and practices that address intoxication and detoxification. The health authority shall develop specific policies and protocols in accordance to local, state, and federal laws for the treatment and observation of inmates manifesting symptoms of intoxication or detoxification from alcohol, opiates, hypnotics, or other drugs. Specific criteria are established for immediately transferring inmates experiencing severe, life threatening

intoxication or detoxification symptoms to a hospital or detoxification center. At the time of the inspection, the jail could produce no updated policies or documentation showing compliance with this standard.

5120:1-8-10(E)(Essential): Each full-service jail shall make provisions for modified diets by physician's order or to accommodate the mandatory dietary requirements of a recognized religion practiced by the inmate. The jail utilizes a nurse to modify dietary orders.

5120:1-8-10(F)(Essential): Each full-service jail shall ensure all persons involved in the preparation of food shall receive a pre-assignment medical examination and annual re-examinations. During the inspection, the jail was not able to show documentation supporting compliance with the pre-screening and annual follow-up elements of this standard for staff involved in the preparation of food.

5120:1-8-17(D)(Important): There shall be a written, implemented staffing plan that includes jail personnel assignments, days of the week, and hours of the day. The written staffing plan was last updated in calendar year 2003 and does not match the current staffing levels at the jail.

5120:1-8-18(A)(1)(2)(Important): Each full-service jail shall ensure jail support staff with routine contact shall receive training and pertinent agency policies and procedures prior to or in conjunction with assignment to jail duties. During the first year of assignment, they must receive twenty four hours of training including legal aspects of corrections, basic security concepts, emergency preparedness, interpersonal communications, first aid/CPR, unarmed self-defense, and Standards for jails in Ohio. They must also receive two hours of in-service training each subsequent year of employment addressing specific job assignments and/or jail related issues. Training files and/or other verification of the required training could not be produced by Jail Administration at the time of the inspection.

5120:1-8-18(B)(1)(2)(3)(Important): Each full-service jail shall ensure that: (1) Correctional officers shall receive training in jail policies within sixty days of employment; (2) During the first year of assignment, training consistent with Chapter 109:2-9 of the Administrative code; and (3) Eight hours of in-service training each subsequent year of employment addressing specific job assignments and/or jail related issues. These training hours are in addition to training mandated by other standards. On the day of the inspection, training records evidencing compliance were not available to evaluate.

5120:1-8-18(C)(1)(2)(3)(Important): Administrators and supervisors shall receive training in addition to the training specified in paragraph (B) of this rule. Training files and/or other verification of the required training could not be produced by Jail Administration at the time of the inspection.

5120:1-8-18(D)(Important): Each full-service jail shall ensure jail support staff with occasional contact receive training in pertinent agency policies and procedures prior to or in conjunction with assignment to jail duties. Training records evidencing compliance were not available to evaluate at the time of the inspection. Further, policy does not differentiate between staff having routine or non-routine (occasional) contact.

5120:1-8-18(E)(Important): The jail policies and procedures shall be available to jail staff, reviewed annually and updated by the Sheriff, jail administrator, or designee as needed. Although the jail policies are available to staff, most policies have not been reviewed annually or updated as required.

Plan of action forms are enclosed. Completed form(s) and/or corrective materials addressing the noted deficiencies must be completed and returned to Assistant Bureau Administrator Jon Radebaugh ([jon.radebaugh@odrc.state.oh.us](mailto:jon.radebaugh@odrc.state.oh.us)) within 45 days of receipt of this correspondence. Please feel free to

contact me if you need assistance or clarification in this effort. The Department remains available to discuss the aspects of this report or to provide reference materials or assistance as desired.

Sincerely,



\_\_\_\_\_  
Scott Kiser, State Jail Inspector (Acting)  
Bureau of Adult Detention  
770 West Broad St. 4th Floor  
Columbus, Ohio 43222  
Telephone: (614) 752-1172  
Cellular: (614) 315-5762  
Email: Anthony.Kiser@odrc.state.oh.us

cc: John F. Adams, Bureau Administrator  
Major Joe Renner, Jail Administrator  
File

# Ohio | Department of Rehabilitation & Correction

John R. Kasich, Governor  
Gary C. Mohr, Director

July 28, 2016

Sheriff Michael Simpson  
Preble County Jail  
1139 Preble Drive  
Eaton, Ohio 45320

RE: 2015 – Annual Jail Inspection

Dear Sheriff Simpson,

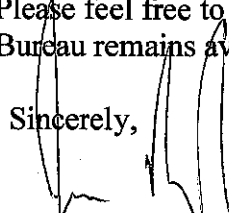
The Bureau of Adult Detention has received the corrective materials you forwarded to our office in response to the annual inspection of the Preble County Jail on December 14-15, 2015. We appreciate your efforts in attempting to maintain compliance with the Standards for Jails in Ohio.

I have reviewed the provided materials. The documentation will increase the level of compliance for the Preble County Jail on specific standards reviewed this year. The jail is now in compliance with Jail Standards: 5120: 1-8-03(B)(12); -04(C); -05(K); -09(A); -09(J); -09(K); -10(F); and -17(D). Additionally, the jail was found to be compliant by Bureau Administrator John Adams on February 17, 2016 after an appeal was received for the following Standards: 5120: 1-8-03(B)(17)(a); -05(M); -09(C); -09(F); -09(V); and -10(E).

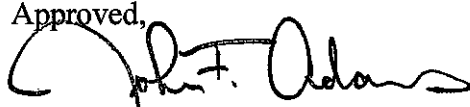
The jail remains out of compliance with Jail Standards: 5120: 1-8-03(B)(8); -03(B)(16); -04(E); -04(H); -05(N); -09(B); -09(M); -09(N); -09(P); -09(Q); -09(R); -09(W); -18(A)(1)(2); -18(B)(1)(2)(3); -18(C)(1)(2)(3); -18(D); -18(E). Please continue to work on your identified Plans of Action for correcting the remaining deficiencies. The Preble County Jail will remain a Status Jail until the remaining corrective action has been completed.

Please feel free to contact me if you have questions relating to this correspondence. As always, the Bureau remains available to provide technical assistance upon request.

Sincerely,

  
Jon Radebaugh, Assistant Administrator  
ODRC/Bureau of Adult Detention  
Office: (614) 752-0911  
Email: [jon.radebaugh@odrc.state.oh.us](mailto:jon.radebaugh@odrc.state.oh.us)

Approved,

  
John F. Adams, Administrator  
ODRC/Bureau of Adult Detention  
Office: (614) 752-1834  
Email: [john.adams@odrc.state.oh.us](mailto:john.adams@odrc.state.oh.us)

cc: Major Joe Renner, Jail Administrator  
Preble County Board of Commissioners  
File