

U.S. Department of Homeland Security  
1600 Callowhill Street  
Philadelphia, Pennsylvania 19130



**U.S. Immigration  
and Customs  
Enforcement**

June 17, 2016

MEMORANDUM TO: Tae Johnson  
Assistant Director  
Custody Management Division

FROM: Jennifer Ritchey   
Deputy Field Office Director  
Philadelphia Field Office

SUBJECT: Clinton County Correctional Facility – Waiver Request

Purpose

Approve a waiver for the Philadelphia Field Office, Allenwood ERO Sub-office, Clinton County Correctional Facility (CCCF) as it relates to 2000 NDS Environmental Health and Safety Standard, as clarified in ACA Standard 4-ALDF-4B-08 (requiring one toilet for every eight females, and one toilet for every 12 males and one washbasin for every twelve inmates) and ACA Standard 4-ALDF-4B-09 (requiring one shower for every 12 inmates).

Background

In November of 2012 Clinton County Correctional Facility (CCCF) was inspected by the Office of Civil Rights and Civil Liberties (CRCL). As a result of this inspection, the aforementioned deficiencies were noted, pertaining to the ration of showers, toilets, and wash basins per detainee.

Discussion

The requirement for CCCF to comply with existing ACA Standards as they relate to the ratio of toilets, showers, and wash basins per detainee has not been addressed before. The rated capacity of the two housing blocks mentioned in the inspection were B (20 beds) and J (42 beds). Since then, the number of available beds in J block has been purposefully decreased to 36. The facility has advised that the number of beds available in each block is not likely to change in the foreseeable future. Also, since the inspection in 2012, both the average daily population and the length of stay have decreased at CCCF from the time of the inspection until now. The average daily population decreased from 58 to 10, and the average length of stay is less than 7 days. With very limited exceptions, CCCF is currently serving as a staging facility to receive daily releases from the Federal Bureau of Prisons (BOP) and detain them pending reassignment to either Pike or York County Prison, or for scheduled removals.

Recommendation

I recommend the authorization of a waiver for CCCF relating to the 2000 NDS Environmental Health and Safety Standard, as clarified in ACA Standard 4-ALDF-4B-08 (requiring one toilet for every eight females, and one toilet for every 12 males and one washbasin for every twelve inmates) and ACA Standard 4-ALDF-4B-09 (requiring one shower for every 12 inmates).

Approve/date jmb 6/30/16 Disapprove/date \_\_\_\_\_  
Modify/date \_\_\_\_\_ Needs more discussion \_\_\_\_\_