MEMORANDUM
December 13, 2005

To: Wesley J. Lee, Acting Director, Office of Detention and Removal, Immigration and Customs Enforcement
From: American Bar Association Delegation to the Pamunkey Regional Jail
File no: 502130-0020
Copies to: ABA Commission on Immigration
Subject: Report on July 18, 2005 Observational Tour of the Pamunkey Regional Jail, Ashland, Virginia

1 The delegation was comprised of attorneys and summer associates from the Washington, D.C. office of Latham & Watkins, LLP, including [redacted] and [redacted].
This memorandum summarizes and evaluates information gathered at the Pamunkey Regional Jail (“PRJ” or “the Facility”) in Ashland, Virginia, during the delegation’s July 18, 2005 visit to the Facility. All information contained herein was gathered via observation of the Facility by the delegation, discussions with PRJ and Immigration and Customs Enforcement (“ICE”) personnel, detainee interviews and review of the Pamunkey Regional Jail Institutional Operations Manual and the Pamunkey Regional Jail Inmate Handbook (“the Handbook”). Note that at the time of our visit, there were only two immigration detainees, one of whom was unwilling to share much information with us, and thus this report relies almost entirely on representations of the ICE and PRJ personnel.

I. ICE DETENTION STANDARDS

In November 2000, the Immigration and Naturalization Service (INS), promulgated the “INS Detention Standards” (the “Standards”) to ensure the “safe, secure and humane treatment” of immigration detainees. The thirty-eight standards contained in the Detention Operations Manual cover a broad spectrum of issues ranging from visitation policies to grievance procedures and food service. These standards apply to ICE-operated detention centers and other facilities that house immigration detainees pursuant to a contract or intergovernmental service agreement (“IGSA”).

The Standards went into effect at ICE-operated detention facilities on January 1, 2001. ICE intended to phase in the Standards at all of its contract and IGSA facilities by December 31, 2002. The Standards constitute a “floor” rather than a “ceiling” for the treatment of immigration detainees; they are designed to establish the minimum requirements to which ICE must adhere in its facilities. Each Field Office or Officer-in-Charge has discretion to promulgate polices and practices affording ICE detainees more enhanced rights and protections, beyond those provided by the Standards.

II. INTRODUCTION

The Delegation’s Visit, July 18, 2005

On Monday, July 18, 2005, the members of our delegation met with several members of PRJ’s staff and a representative from the ICE office in Washington, D.C. Note that PRJ serves primarily as a transfer facility that does not tend to house immigration detainees on a long-term basis; most of its detainees are heading either to deportation or from initial apprehension to Hampton Roads Regional Jail or Piedmont Regional Jail in Farmville, Virginia. Those two facilities house a large number of immigration detainees awaiting Immigration Court hearings. Accordingly, while as discussed in detail below we did not see any substantial issues of failure to meet the Standards, nor did the staff at PRJ have extensive experience with application of those Standards to immigration detainees. For the most part, it appears that following the Standards is incidental to compliance with regulations implemented for the general criminal population.

2 Effective March 1, 2003, the INS ceased to exist as an agency of the Department of Justice. The INS’ immigration enforcement functions which previously were transferred to ICE, a division of the newly-created Department of Homeland Security (“DHS”).
Captain, Sergeant, Lieutenant, Officer, and ICE Deportation Officer/Jail Liaison Officer led our delegation on a tour of the Facility and participated in post-tour follow-up discussions. The delegation also met with other PRJ personnel along the tour. The delegation appreciates the cooperation of these individuals. They were direct and accommodating during the tour of the Facility and were responsive to post-tour requests for additional information.

General Information About the Pamunkey Regional Jail

The PRJ houses federal immigration detainees pursuant to an intergovernmental service agreement (“IGSA”) with ICE. According to PRJ personnel, the Facility presently holds 405 inmates, 362 of whom are male and 43 of whom are female. As of July 10, 2005, the Facility held 147 immigration detainees. On July 11 and 12, 2005, 145 immigration detainees were transferred to other facilities. As a result, only two immigration detainees were available for interview. All detainees transferred in the month of July were either from Mexico or El Salvador. ICE Officer explained that the majority of PRJ immigration detainees are from Central and South American countries.

III. OBSERVATIONS OF LEGAL ACCESS STANDARDS

A. Legal Access/Visitation

1. Visitation by Attorneys

The Standards suggest that facilities permit legal visitation seven days per week. Attorneys should have access to their clients eight hours per day during the week and four hours per day during the weekend. The visits must be private, and should not be interrupted for head counts. Facilities should establish a procedure by which attorneys may call to determine whether a detainee is housed in a particular facility. Detention centers should permit visits from attorneys, other legal representatives, legal assistants, and interpreters.

Notes of delegation member

Notes of delegation member

Notes of delegation member

Notes of delegation member

Other than the coincidental timing, we have no reason to believe the transfer was related to our upcoming tour. PRJ is not a permanent home for most detainees, who are regularly housed at Piedmont Regional Jail or at Hampton Roads Regional Jail.

Notes of delegation member on conversation with Officer


PRJ appears to meet this section of the Standards. According to the conversations with PRJ staff, attorneys may visit the detainees seven days per week. However, the Handbook states that professional visits from attorneys will be authorized Monday to Friday, 8:00 a.m. to 9:30 p.m. It is unclear whether the detainees know that the Handbook provisions are inapplicable. Professional visits from others such as law students, clergy members, or physicians are allowable to the extent they conform to the Handbook rules on pre-approval. PRJ staff explained that there are no general time limits on how long an attorney may visit with a detainee, and if a meeting runs through a scheduled meal, the detainee will be provided with a sack meal. Attorneys are offered the option of telephone conference calls with their clients. According to PRJ staff, attorneys typically initiate the calls, though detainee instructions for making outside calls are available in the Handbook and are posted in the housing units.

There are two private consultation rooms available for attorney visits with their clients. Visitations in the consultation rooms are private to the extent that PRJ staff are not able to listen in, but they are viewable from the corridors. After every contact visit in a consultation room, detainees will be subject to strip-search. If detainees do not wish to be strip-searched, they can opt for non-contact visits with their attorneys.

2. Visitation by Family and Friends

The Standards suggest that facilities establish written visitation hours and procedures, and make them available to the public. This includes procedures for handling incoming money for detainees. The Standards require that visiting hours be set on Saturdays, Sundays, and holidays, and the Standards encourage facilities to accommodate visitors at other times when they are facing a particular hardship. Visits should be at least 30 minutes and longer when possible. If a facility does not provide for visits from minors, the ICE should arrange for visits

---

13 Notes of delegation member on conversations with facility staff.
14 PRJ Inmate Handbook, p. 16.
15 PRJ Inmate Handbook, p. 16.
16 Notes of delegation member on conversations with facility staff.
17 Notes of delegation member on conversations with facility staff.
18 Notes of delegation member on conversations with facility staff.
19 Notes of delegation member on conversations with facility staff.
20 Observations of delegation member.
21 Notes of delegation member based on conversation with Officer.
22 Detention Operations Manual, Detainee Services, Standard 17, Section III.A & B.
23 Detention Operations Manual, Detainee Services, Standard 17, Section III.D.
with children within the detainee’s first 30 days at the facility, with continuing monthly visits.\textsuperscript{25} If a detainee violates the visitation rules, s/he may have visitation privileges revoked.\textsuperscript{26}

\textbf{PRJ substantially meets this section of the Standards, but there are no weekend visiting hours.} The visitation schedule is clearly posted at the entrance of the Facility and is available in the Handbook.\textsuperscript{27} Visiting hours are from Monday through Friday, 9 a.m. to 9:30 p.m., although visits are not allowed from 11 a.m. to 2 p.m. and 4 p.m. to 7:30 p.m. for lunch and dinner breaks.\textsuperscript{28} This visitation schedule does not comport with the Standards, which requires that visits be allowed on the weekends. Detainees are allowed to either have up to two adults or one adult and two children visitors at any given time, and may have up to two visits per week on any one day lasting up to thirty minutes.\textsuperscript{29} When visitors live up to 75 miles away from PRJ, visits can be extended up to one hour.\textsuperscript{30} Detainees must schedule their visits a week in advance in the visitation log.\textsuperscript{31} Upon arrival at PRJ, dress code instructions are clearly visible in the lobby.

Visitors are able to send money in to detainees, which will be placed in an account for the detainee.\textsuperscript{32} Detainees are also allowed to keep personal property such as small religious items like the Bible or prayer rugs, legal documents, photographs, and personal correspondence, but are not allowed to wear their wedding rings.\textsuperscript{33}

\textbf{B. Telephone Access}

\textbf{1. General Requirements}

The Standards suggest that facilities provide detainees with reasonable and equitable access to telephones during established facility waking hours.\textsuperscript{34} In order to meet this requirement, facilities must provide at least one telephone for every 25 detainees.\textsuperscript{35} The Standards also require that telephone access rules be provided in writing to each detainee upon admittance, and that the rules be posted where detainees may easily see them.\textsuperscript{36}

\begin{itemize}
  \item \textsuperscript{25} Detention Operations Manual, Detainee Services, Standard 17, Section III.H.2.
  \item \textsuperscript{26} Detention Operations Manual, Detainee Services, Standard 17, Section III.H.5.
  \item \textsuperscript{27} Observations of delegation member and Pamunkey Regional Jail (PRJ) Inmate Handbook, p. 15.
  \item \textsuperscript{28} PRJ Inmate Handbook, p. 15.
  \item \textsuperscript{29} PRJ Inmate Handbook, p. 15.
  \item \textsuperscript{30} PRJ Inmate Handbook, p. 16.
  \item \textsuperscript{31} PRJ Inmate Handbook, p. 16.
  \item \textsuperscript{32} PRJ Inmate Handbook, p. 8.
  \item \textsuperscript{33} Notes of delegation member on interview with anonymous detainee.
  \item \textsuperscript{34} Detention Operations Manual, Detainee Services, Standard 16, Sections I & III.A.
  \item \textsuperscript{35} Detention Operations Manual, Detainee Services, Standard 16, Section III.C.
  \item \textsuperscript{36} Detention Operations Manual, Detainee Services, Standard 16, Section III.B.
\end{itemize}
PRJ substantially meets this section of the Standards. The Handbook summarizes the conditions of telephone use. These rules were not, however, posted elsewhere in the Facility where detainees might easily find them.37

Detainees are separated into housing units that vary in size, the largest equipped to hold perhaps 50-60 individuals. In each housing unit were four telephones available for inmate use. In addition, there are a number of telephones (6-8) located in the “intake” portion of the Facility. These phones are available upon request to detainees while they are awaiting initial classification upon arrival. Also, while the telephones in the housing units are for outgoing calls only, detainees’ lawyers may schedule a call to the detainee at a predetermined time during which the Facility will bring the detainee to the intake room to receive the call.38

2. Direct Calls and Free Calls

The Standards maintain that facilities should permit detainees to make direct calls to the local immigration court and the Board of Immigration Appeals, federal and local courts, consular officials, legal service providers, government offices, and to family members in cases of emergency.39 These calls are not to be charged if the detainee is indigent, and all detainees should be able to make calls to an ICE-provided list of free legal service providers and consulates at no charge to the detainee or receiving party.40

PRJ does not fully meet this section of the Standards. While instructions on how to use the telephones in the housing units were posted near the phones, there was no detailed list of consulate numbers nor numbers for legal services providers in the housing unit we observed.41 There was a listing for a toll-free number for ICE. This information was posted both in English and Spanish.42

PRJ staff explained that the phones did have consulate numbers pre-programmed into them, though there was no individualized listing of such numbers by the phones.43 PRJ personnel indicated that they had made available to detainees the phone numbers for organizations offering legal services, such as the CAIR Coalition.44 Detainees are permitted to contact Officer for assistance in placing such calls, and ICE has provided her office with phone cards specifically for this purpose.45 This information was not posted near any of the

---

37 Observations of delegation team.
38 Notes of delegation member on conversations with facility staff.
39 Detention Operations Manual, Detainee Services, Standard 16, Section III.E.
40 Detention Operations Manual, Detainee Services, Standard 16, Section III.E.
41 Observations of delegation team.
42 Observation of delegation member on conversation with Officer.
43 Notes of delegation member on conversation with Officer.
44 Notes of delegation member on conversation with Officer.
45 Notes of delegation member on conversation with Officer.
phones we observed, however, indicating that detainees would be dependent on notification from staff that such services are available.\textsuperscript{46}

While telephone service for detainees (indeed, for all prisoners) is not limited to collect calls alone, direct calling from the telephones located in the housing units is fairly expensive. Local calls had a connection fee of $1.35 and cost $.18/minute. International calls had a $3.95 connection fee and cost $.89/minute.\textsuperscript{47} During our interview with one detainee, s/he repeatedly mentioned that the cost of phone calls even within the state were prohibitively expensive. S/he estimated that a call to his/her brother or lawyer in northern Virginia cost $20.00 or more for a 15-minute call.\textsuperscript{48} All calls are restricted to no more than 15 minutes.\textsuperscript{49}

3. \textit{Incoming Calls and Messages}

The \textit{Standards} suggest that facilities take and deliver messages from attorneys and emergency incoming telephone calls to detainees as promptly as possible.\textsuperscript{50} If the facility receives an emergency telephone call for a detainee, the \textit{Standards} suggest that the facility obtain the caller’s name and number and permit the detainee to return the emergency call as soon as possible.\textsuperscript{51}

\textbf{PRJ partially meets, and partially exceeds, this section of the \textit{Standards}.} Incoming phone calls and messages are generally not accepted at the Facility.\textsuperscript{52} In situations where an attorney is seeking to make telephone contact with a client, the Facility will try either to bring the detainee to the phone call at the time it is received or, alternatively, try to work out with the attorney a scheduled call soon thereafter when the detainee can be brought to the front office to receive the call.\textsuperscript{53} The Handbook states that if a message is “verified” as an emergency, it will be delivered to an inmate.\textsuperscript{54}

4. \textit{Telephone Usage Restrictions}

The \textit{Standards} maintain that phone calls should not be unreasonably restricted and that time limits, if necessary, should be no shorter than 20 minutes.\textsuperscript{55}

\begin{itemize}
\item[46] Observations of delegation member.
\item[47] Observations of delegation member.
\item[48] Interview with anonymous detainee.
\item[49] PRJ Inmate Handbook at 13.
\item[50] Detention Operations Manual, Detainee Services, Standard 16, Section III.I.
\item[51] Detention Operations Manual, Detainee Services, Standard 16, Section III.I.
\item[52] PRJ Inmate Handbook at 13.
\item[53] Notes of delegation member on conversation with Officer.
\item[54] PRJ Inmate Handbook, p. 15.
\item[55] Detention Operations Manual, Detainee Services, Standard 16, Section III.F.
\end{itemize}
PRJ does not fully meet this section of the Standards. PRJ places 15-minute time limits on telephone calls made from the housing units. The Jail also deactivates telephones in the housing units during meals and other logistical events. Our tour of a housing unit occurred during lunchtime, when the phones had been deactivated and could not be tested.

5. Privacy for Telephone Calls on Legal Matters

The Standards maintain that the facility should ensure privacy for detainees’ telephone calls regarding legal matters. As a consequence, the facility should provide a reasonable number of telephones on which detainees can make such calls without being overheard by officers, other staff or other detainees.

PRJ does not fully meet this section of the Standards. The only telephones available to detainees were situated in public spaces, with no way to ensure detainee privacy. There were small meeting rooms at the detainees’ disposal for face-to-face meetings with lawyers, and conversations in these rooms are reportedly not monitored, but there were no telephones in these rooms.

Telephone calls on legal matters are not supposed to be monitored under the Standards. While PRJ staff indicated that there was no policy to monitor such calls actively, the right to do so is explicitly reserved in the Handbook. Moreover, PRJ staff indicated that there may be some random monitoring of phone activity.

C. Access to Legal Materials

This section of the Standards aims to ensure that detention facilities provide detainees “access to a law library, and provide legal materials, facilities, equipment and document copying privileges, and the opportunity to prepare legal documents.” These standards are applicable to intergovernmental service agreements (IGSAs) as “guidelines… provided they meet or exceed the objective represented by each standard.”

1. Library Conditions

The Standards suggest that each facility provide “a designated room with sufficient space to facilitate detainees’ legal research and writing.” The library should be large enough to

---

57 PRJ Inmate Handbook at 14.
58 Observations of delegation member.
59 Detention Operations Manual, Detainee Services, Standard 16, Section III.J.
60 Observations of delegation member.
61 Notes of delegation member on conversation with Officer.
62 Detention Operations Manual, Detainee Services, Standard 1, Section I.
63 Detention Operations Manual, Detainee Services, Standard 1, Section II.
64 Detention Operations Manual, Detainee Services, Standard 1, Section III.A.
facilitate use by all detainees who request its use, have an adequate number of tables and chairs and be well-lit and relatively quiet. In addition, the Standards provide that the library make available supplies, such as typewriters, computers, paper, and pens, to facilitate the preparation of legal materials and that the facility assign a staff member to maintain the equipment and supplies.

**PRJ substantially meets this section of the Standards.** The Facility provides a small well-lit room for the law library. The space has three bookshelves filled with legal materials, a computer, which did not appear to work when tested and was not connected to a printer, and one medium-sized table for research. The library is located adjacent to a main corridor, but was very quiet during our visit. According to Facility staff, three to four people can use the library at one time. Staff also gave the impression that there is a low demand for the law library. According to staff, few inmates request use of the law library. The current facilities available at the law library are adequate given the small demand for the service, and small number of detainees at the Facility. Detainees are not routinely provided access to typewriters or computers to prepare legal documents, but typing is provided upon request and for a fee. According to staff, detainees rarely request this service. In addition, all detainees are issued legal pads and pens.

### 2. Library Holdings

Attachment A to the Standards provide a list of materials that should be included in the law library. Facilities should also define procedures for updating and maintaining the materials and receiving and requesting new materials.

**PRJ substantially meets this section of the Standards.** The law library had copies of most of the materials listed. There was not a copy of the Florence Project’s “Know your

---

65 Detention Operations Manual, Detainee Services, Standard 1, Section III.A.
66 Detention Operations Manual, Detainee Services, Standard 1, Section III.B.
67 Observations of delegation member.
68 Observations of delegation member.
69 Observations of delegation member.
70 Notes of delegation member on conversation with Sergeant.
71 Notes of delegation member on conversation with Sergeant.
72 Notes of delegation member on conversation with Sergeant.
73 Notes of delegation member on conversation with Officer.
74 Notes of delegation member on conversation with Officer.
75 Notes of delegation member on conversation with Officer. PRJ Inmate Handbook, Section 6-E.
76 Detention Operations Manual, Detainee Services, Standard 1, Section III.C-F.
77 Notes of delegation member.
Rights” video. The library contained both English and Spanish language materials. The Facility receives updated materials from ICE on an irregular schedule, usually every three to four months. Inmates may request materials not available in the library by submitting a request form to program staff. Program staff seemed willing to process these requests.

3. **Hours of Access**

The *Standards* advise that the library schedule should allow all detainees use of the library for a minimum of five hours per week. Library use should not conflict with recreation time. The library schedule should also provide for maximum use of the library without “interfering with the orderly operation of the facility.”

PRJ substantially meets this section of the *Standards*; although normal library time allotted is only one hour per week, detainees may request additional time. Detainees may sign up in their housing unit to use the library for one hour, one day per week. This time does not conflict with recreational time. Detainees may request additional time. Staff indicated that few detainees request to use the library, therefore such requests are ordinarily granted and a detainee may achieve more than five hours of library use per week.

4. **Library Services and Assistance from Other Detainees**

The *Standards* urge facilities to provide a mechanism for detainees to receive legal materials not available in the law library and for detainees to photocopy legal materials. The facility should allow detainees to assist fellow inmates with legal research, but not allow fellow inmates to charge for these services. In addition, the facility should provide “more than access to a set of English-language law books,” to illiterate or non-English speaking detainees, and should establish procedures for assisting such detainees.

PRJ fully meets this section of the *Standards*. Detainees can request additional materials through the standard inmate request form. Program staff indicated a willingness to acquire these materials, including non-English language materials, but noted that staff rarely
received such requests. Photocopies are provided on request, and are usually processed within twenty-four hours. Copies cost $0.25 per page and are charged to detainees’ accounts. Inability to pay will result in a negative balance, but will not prevent detainees from receiving photocopies. Prisoners often volunteer to help other prisoners with non-English materials, and staff helps facilitate this relationship. The Facility prohibits charging for legal assistance.

5. **Personal Legal Materials, Law Library Access for Detainees in Special Management Units, Envelopes and Stamps for Legal Documents**

The *Standards* state that facilities should allow detainees to retain all personal legal materials. In addition, the *Standards* require that detainees housed in administrative or disciplinary segregation should have the same access to legal materials as other detainees. The *Standards* suggest the facility provide detainees with free envelopes and stamps for mailing legal documents.

**PRJ meets this section of the Standards.** Detainees are allowed to retain all of their legal materials in their housing units. In addition, detainees who pose a security risk are allowed full access to the library. If a detainee who poses a security-risk wants to use the library, the Facility posts a guard outside the library to maintain order. The Facility provides each inmate with a specific amount of envelopes and stamps per month if indigent.

6. **Notaries, Certified Mail, and Miscellaneous Needs Associated with Legal Materials**

The *Standards* specify that facilities should provide access to a notary public, certified mail, or other similar services needed for legal matters.

**PRJ fully meets this section of the Standards.** A detainee may have documents notarized through the programs office for a fee.
7. Notice to Detainees

The Standards state that a facility should inform detainees of law library access procedures, including the library’s hours of access and procedures for requesting access to the law library, to additional time in the library, to legal materials not available in the library, and for notifying staff if materials are missing or damaged. In addition, the library should post a list of the library’s holdings and of library procedures in the law library.

PRJ meets this section of the Standards. Information about the law library is provided in the Handbook, which specifies how to gain access to the library and where to find a library schedule. Staff mentioned that a schedule and sign up sheet for access to the library is available in each housing unit. A binder listing the library holdings is available in the law library.

D. Group Rights Presentations

The Standards provide that facilities holding ICE detainees “shall permit authorized persons to make presentations to groups of detainees for the purpose of informing them of U.S. immigration law and procedures, consistent with the security and orderly operation of the IGSA facility.” Informational posters are to be prominently displayed in the housing units at least forty-eight hours in advance of a scheduled presentation. While the presentations are open to all detainees, the facility “may limit the number of detainees at a single session.” “The facility shall select and provide an environment conducive to the presentation, consistent with security.” In addition, detainees shall have regular opportunities to view an “INS-approved videotaped presentation on legal rights.”

PRJ meets this section of the Standards. According to PRJ staff, there are no restrictions on group rights presentations, although only the CAIR Coalition has requested to make such presentations. The CAIR Coalition makes presentations once every two months. PRJ detainees are housed in dormitory style units, each containing a separate seating area. Group rights presentations are held in the seating area of the units and are open to any detainee...
housed in that unit. Typically, an authorized organization makes a presentation to the assembled detainees and is subsequently available for individual questions from detainees afterwards.

IV. OTHER GENERAL OBSERVATIONS UNRELATED TO THE LEGAL ACCESS STANDARDS

A. Recreation

The ICE policy on recreation requires facilities to provide detainees with “access to recreational programs and activities, under conditions of security and supervision that protect their safety and welfare.” If outdoor recreation is available, the Standards stipulate that each detainee shall have access for at least one hour daily, five days per week.

PRJ meets this section of the Standards. PRJ has an open-air courtyard that is enclosed but exposed above. There, detainees are able to access the outdoors every day for one hour at 3:00 pm. On the weekends, due to staffing constraints, access to outdoor recreation is at the guard’s discretion. There is a basketball court available to detainees in the courtyard, as well as some other limited exercise equipment. There is no conflict between outdoor recreation access and library access, as the library can be accessed at any time during the day upon request and subject to availability.

B. Access to Medical Care

1. General

   a. Personnel

   The Standards mandate that all facilities employ a medical staff large enough to perform basic exams and treatments for all detainees. The Standards further require that health care staff have valid professional licensure or certification. The Standards also require that each

---

facility enter into certain arrangements with nearby medical facilities or health care providers for the provision of required health care that is not available within that facility.122

**PRJ meets this section of the Standards.** PRJ currently employs five full-time health care professionals: one registered nurse, two licensed practical nurses, one paramedic and one basic EMT. Interviews with health care staff revealed that PRJ typically employs six full-time health care professionals and, accordingly, the Facility is currently seeking an additional health care professional.123 Additionally, PRJ employs various “on-call” doctors, dentists and counselors. According to interviews conducted with health care staff, there is at least one doctor, dentist and counselor “on-call” at all times.124 Moreover, there are two doctors “on-call” during daytime hours.125 Finally, according to PRJ staff, the Facility has agreements with nearby health care facilities to provide certain services.126

b. **Facility**

The *Standards* maintain that each facility must provide adequate space and equipment for the provision of health care services.127 The *Standards* also require that such space should allow detainees to receive health examinations and treatment in private.128

**PRJ meets this section of the Standards.** The PRJ infirmary provides more than adequate space for the provision of health care services and includes several private examination rooms for individual treatment. The infirmary also includes a waiting room with its own restroom facilities.

2. **Initial Screenings**

The *Standards* require that all new arrivals receive initial health screening within fourteen (14) days of arrival at a facility.129 Initial health screenings must include a TB screening, as well as screening for substance abuse and/or withdrawal.130 Along with a basic physical and collection of medical history, an initial screening must include a dental screening exam and a mental health assessment.131 The *Standards* also mandate that each facility provide translation services in connection with initial health screenings.132 Facilities are encouraged to use

---

122 Detention Operations Manual, Health Services, Standard 2, Section III.A.
123 Notes of delegation member on conversation with Facility health care staff.
124 Notes of delegation member.
125 Notes of delegation member.
126 Notes of delegation member on conversation with facility health care staff.
127 Detention Operations Manual, Health Services, Standard 2, Section III.B.
128 Detention Operations Manual, Health Services, Standard 2, Section III.B.
129 Detention Operations Manual, Health Services, Standard 2, Section III.D.
130 Detention Operations Manual, Health Services, Standard 2, Section III.D.
131 Detention Operations Manual, Health Services, Standard 2, Section III.D.
132 Detention Operations Manual, Health Services, Standard 2, Section III.D.
telephone translation services and, when appropriate, the Standards allow other detainees to be used for translation purposes.133

**PRJ meets this section of the Standards.** PRJ requires all detainees to undergo a complete health assessment within fourteen days of detainment.134 For translation services, PRJ staff indicated that the Facility uses an AT&T telephonic translation service and also relies on other detainees to provide translation services, where appropriate.135

3. **Medical Care**

   a. **Sick Call**

      The Standards maintain that each facility must have a regularly scheduled Sick Call, when medical personnel are available to see detainees who have requested medical services.136 Each facility must make Sick Call request slips available to detainees and must process such requests slips in a timely manner.137 The Standards also require Sick Call to be scheduled a minimum number of days per week, according to the specific size of each facility.138

      **PRJ meets this section of the Standards.** The Facility conducts “Sick Call” on a scheduled basis and it is performed by, or at the direction of, a registered nurse.139 Sick Call request slips are available in all housing units and are to be picked up once a day by medical department staff.140 PRJ staff indicated that the Facility conducts Sick Call two days per week.141

   b. **Emergency Care**

      The Standards require that facility health care staff be properly trained to handle medical emergencies.142 The Standards also maintain that each facility have procedures allowing for 24-hour emergency care.143

      **PRJ meets this section of the Standards.** As previously mentioned, the Facility’s health care staff includes both a paramedic and an EMT and at least one “on-call” doctor is available to

---

133 Detention Operations Manual, Health Services, Standard 2, Section III.D.
135 Notes of delegation member on conversation with Facility health care staff.
136 Detention Operations Manual, Health Services, Standard 2, Section III.F.
137 Detention Operations Manual, Health Services, Standard 2, Section III.F.
138 Detention Operations Manual, Health Services, Standard 2, Section III.F.
139 Pamunkey Regional Jail, Institutional Operations, Section 4E-26.
141 Notes of delegation member on conversation with Facility health care staff.
142 Detention Operations Manual, Health Services, Standard 2, III.G.
143 Detention Operations Manual, Health Services, Standard 2, III.G.
the Facility at all times. Moreover, the Facility’s emergency medical care plan includes provisions for (1) on-site emergency first aid and crisis intervention, (2) emergency evacuation of a detainee from the Facility, (3) use of an emergency medical vehicle, (4) use of one or more designated hospital emergency rooms or designated health facilities and (5) security procedures providing for the immediate transfer of inmates when appropriate. Additionally, first aid kits are available throughout the Facility.

c. Disbursement of Medication

The Standards maintain that medication must be disbursed to detainees according to specific instructions and procedures.

**PRJ fully meets this section of the Standards.** The Handbook states that Pill Call will be conducted by medical staff or a trained staff member. Interviews with health care staff revealed that Pill Call is conducted three times per day at the Facility. Moreover, PRJ also has procedures allowing detainees to participate in a self-administered medication program, where appropriate.

4. Dental Care

The Standards require that all detainees be provided with emergency dental treatments, as well as routine dental treatment for those detainees who remain at a facility for more than six months.

**PRJ appears to meet this section of the Standards.** According to PRJ Institutional Operations, PRJ provides emergency dental care, including the retention of an “on-call” dentist for such purposes, and by providing all detainees with dental examinations within three months of admission to the Facility.

5. Miscellaneous Standards

a. Confidentiality

The Standards state that all detainee medical records should be kept confidential, to the extent possible. The Standards also mandate that copies of detainee health records be released

---

144 Notes of delegation member on conversation with Facility health care staff.
145 Pamunkey Regional Jail, Institutional Operations, Section 4E-08.
146 Pamunkey Regional Jail, Institutional Operations, Section 4E-25.
147 Detention Operations Manual, Health Services, Standard 2, Section III.I.
148 Notes of delegation member on conversation with Facility health care staff.
149 Pamunkey Regional Jail, Institutional Operations, Section 4E-23.
150 Detention Operations Manual, Health Services, Standard 2, Section III.E.
152 Detention Operations Manual, Health Services, Standard 2, Section III.M.
to a detainee or a person designated by the detainee, upon receipt of written authorization by the detainee.\textsuperscript{153}

**PRJ partially meets this section of the Standards.** While the Facility keeps all medical records confidential and separate from other detainee records, the Facility apparently only permits detainee access to medical records through court order.\textsuperscript{154}

\subsection*{b. Informed Consent}

The *Standards* maintain that no medical treatment should be administered against a detainee’s will.\textsuperscript{155} Accordingly, facility health care providers are required to obtain signed and dated consent forms from all detainees prior to any medical examination or treatment, except in emergency situations.

**PRJ meets this section of the Standards.** PRJ procedures require the written consent of detainees prior to medical treatment except in emergency situations or when a detainee is otherwise unable to give consent.\textsuperscript{156}

\subsection*{c. Suicide Prevention and Intervention}

The *Standards* maintain that all staff working inside detention facilities must be trained to recognize signs and situations that potential indicate a suicide risk, to act to prevent suicides with appropriate sensitivity, supervision and referrals and to provide any at-risk detainee with preventative supervision and treatment.\textsuperscript{157}

**PRJ meets this section of the Standards.** Facility procedures provide for assessment and prevention of suicide risk beginning with a detainee’s initial health assessment and continuing throughout his/her detainment.\textsuperscript{158} The Facility’s suicide prevention and intervention progress is to be carried out by all employees who come into contact with the detainees.\textsuperscript{159}

\section*{C. Detainee Classification}

The *Standards* suggest that detention facilities use a classification system and physically separate detainees in different categories.\textsuperscript{160} A detainee’s classification is to be determined by “objective” criteria, including criminal offenses, escape attempts, institutional disciplinary

\begin{flushleft}
\textsuperscript{153} Detention Operations Manual, Health Services, Standard 2, Section III.M.  \\
\textsuperscript{154} Pamunkey Regional Jail, Institutional Operations, Section 4E-46. \textsuperscript{155} Detention Operations Manual, Health Services, Standard 2, Section III.L.  \\
\textsuperscript{156} Pamunkey Regional Jail, Institutional Operations, Section 4E-42. \textsuperscript{157} Detention Operations Manual, Health Services, Standard 3, Section I.  \\
\textsuperscript{158} Pamunkey Regional Jail, Institutional Operations, Section 4E-34.  \\
\textsuperscript{159} Pamunkey Regional Jail, Institutional Operations, Section 4E-34.  \\
\textsuperscript{160} Detention Operations Manual, Detainee Services, Standard 4, Section I.
\end{flushleft}
history, violent incidents, etc.\textsuperscript{161} Opinions, unconfirmed and unverified information, and physical characteristics and appearance are not to be taken into account.\textsuperscript{162} Classification is required in order to separate detainees with no or minimal criminal records from inmates with serious criminal records.\textsuperscript{163}

Additionally, all facility classification systems must allow classification levels to be re-determined and include procedures by which new arrivals can appeal their classification levels.\textsuperscript{164} Finally, the detainee handbook’s section on classification must include (1) an explanation of the classification levels, with the conditions and restrictions applicable to each, and (2) the procedures by which a detainee may appeal his classification.\textsuperscript{165}

**PRJ does not fully meet this section of the Standards.** PRJ has the capacity for segregation as it possesses both “minimum” and “medium” security units.\textsuperscript{166} However, the Facility is by and large unable to make appropriate classifications of detainees upon entry to the jail because the Facility lacks the background information about the detainees needed to make such assessments.\textsuperscript{167} When a detainee arrives at PRJ, the only information provided to the staff is his/her name, country of origin, and alien number.\textsuperscript{168} Thus, the lack of proper information makes it impossible for the staff initially to separate non-violent from violent detainees.

However, PRJ strives to classify and segregate detainees when evidence of criminal history and violence is available.\textsuperscript{169} PRJ does not base such classifications on opinions or unconfirmed information, or solely on physical characteristics and appearance.\textsuperscript{170} Opportunities for classification and segregation tend to exist in two situations. First, PRJ apparently has received many detainees who are members of an El Salvadoran gang called MS-13.\textsuperscript{171} If a detainee identifies himself as a member of MS-13 and is deemed dangerous, he is segregated into a “medium” security unit.\textsuperscript{172} However, PRJ officials do not automatically segregate a detainee simply because s/he has gang tattoos or other markings. Instead, PRJ staff assesses whether the detainee is an active gang member and dangerous through an interview.\textsuperscript{173} Second, detainees are

\textsuperscript{161} Detention Operations Manual, Detainee Services, Standard 4, Section III.D.
\textsuperscript{162} Detention Operations Manual, Detainee Services, Standard 4, Section III.D.
\textsuperscript{163} Detention Operations Manual, Detainee Services, Standard 4, Sections III.A & E.
\textsuperscript{164} Detention Operations Manual, Detainee Services, Standard 4, Sections III.G. & H.
\textsuperscript{165} Detention Operations Manual, Detainee Services, Standard 4, Section III.I.
\textsuperscript{166} Observations of delegation member, on conversation with Officer b6
\textsuperscript{167} Notes of delegation member, on conversation with Officer b6, b7C
\textsuperscript{168} Notes of delegation member, on conversation with Officer b6, b7C
\textsuperscript{169} Notes of delegation member, on conversation with Captain b6, b7C
\textsuperscript{170} Notes of delegation member, on conversation with Captain b6, b7C
\textsuperscript{171} Notes of delegation member, on conversation with Captain b6, b7C
\textsuperscript{172} Notes of delegation member, on conversation with Captain b6, b7C
\textsuperscript{173} Notes of delegation member, on conversation with Captain As Captain b6, b7C explained, it would be unfair to segregate someone just because of his tattoo when he may have he gang as a young person and since dropped out.
segregated into “medium” security when they commit a dangerous infraction while housed in the “minimum” security portion of the Facility.\textsuperscript{174}

The Inmate Handbook has a section on classification, but it does not include an explanation of the classification levels with the conditions and restrictions applicable to each.\textsuperscript{175}

\textbf{D. Voluntary Work Program}

The \textit{Standards} suggest that all facilities with work programs provide an opportunity for physically and mentally capable detainees to “work and earn money.”\textsuperscript{176} Participation must be voluntary, and detainees may not work more than eight hours per day, and 40 hours per week.\textsuperscript{177}

\textbf{PRJ does not meet this section of the \textit{Standards}, however this may be due to the temporary nature of PRJ.} PRJ does not have in place any voluntary work program through which detainees might earn money.\textsuperscript{178} PRJ staff implied that this could be a function of PRJ being a temporary holding station where detainees are rarely held for more than a month.\textsuperscript{179}

\textbf{E. Grievance Procedures}

The \textit{Standards} recommend that each facility develop operating procedures that address detainee grievances including emergency grievances and guarantee against reprisals.\textsuperscript{180} The grievance procedure should also include provisions for translation and assistance to detainees needing help with filing a grievance.\textsuperscript{181} A grievance procedure should also allow informal oral reporting within five days of the incident.\textsuperscript{182}

\textbf{PRJ appears to meet this section of the \textit{Standards}.} The Inmate Handbook describes a grievance procedure that allows for filing of formal complaints and informal resolution, though it does not include provisions for oral reporting.\textsuperscript{183} Based on our interviews with PRJ personnel, it appears that in practice the facility allows oral reporting of grievances. PRJ personnel did not report any problems with the grievance procedure, however, the detainees with whom we spoke had not used the grievance procedure.\textsuperscript{184}

\begin{footnotesize}
\begin{itemize}
\item \textsuperscript{174} Notes of delegation member on conversation with Captain.
\item \textsuperscript{175} PRJ Inmate Handbook at p. 10.
\item \textsuperscript{176} Detention Operations Manual, Detainee Services, Standard 18, Sections I & III.A.
\item \textsuperscript{177} Detention Operations Manual, Detainee Services, Standard 18, Sections III.A & H.
\item \textsuperscript{178} Notes of delegation member on conversation with Captain.
\item \textsuperscript{179} Notes of delegation member based on conversations with Officer.
\item \textsuperscript{180} Detention Operations Manual, Detainee Services, Standard 5, Section I & III.C & D.
\item \textsuperscript{181} Detention Operations Manual, Detainee Services, Standard 5, Section III.A.
\item \textsuperscript{182} PRJ Inmate Handbook at pp. 43-44.
\item \textsuperscript{183} Notes of delegation member based on conversations with Officers and anonymous detainees.
\end{itemize}
\end{footnotesize}
F. Religious Practices

The Standards suggest that detainees of different religious beliefs be provided with reasonable and equitable opportunities to participate in the practices of their respective faiths. According to the Standards, these “opportunities will exist for all equally, regardless of the number of practitioners of a given religion, whether the religion is ‘mainstream,’ whether the religion is ‘Western’ or ‘Eastern,’ or other such factors. Opportunities will be constrained only by concerns about safety, security, the orderly operation of the facility, or extraordinary costs associated with a specific practice.”

PRJ does provide opportunity for religious practice. According to PRJ staff, each unit has a classroom that is used for worship services. It was further explained that worship services for the Christian, Jewish, Muslim and Buddhist faiths are provided.

G. Disciplinary Policy

The Standards preclude discipline that uses corporal punishment, deviation from normal food, or deprivation of clothing, bedding, personal hygiene products, physical exercise, telephone access, correspondence, or access to law libraries. Detainees ordinarily retain visiting privileges while in administrative or disciplinary segregation. Facilities shall have graduated scales of offenses and disciplinary consequences. Disciplinary segregation is to be limited to 60 days.

PRJ does not fully meet this section of the Standards. Neither of the immigration detainees at the Facility when we visited had been disciplined, so our review of PRJ’s disciplinary policy is based on the Detainee Handbook and interviews of PRJ personnel. PRJ appears to follow much of this section of the Standards, including an appropriate hearing and appeals procedure. However, PRJ does not allow detainees in segregation to have any visitation aside from legal visits, and does not allow detainees in segregation to go outside. Each detainee in segregation is allowed one hour per day outside the cell to use the shower, phone and read the papers.

H. Staff-Detainee Communication

185 Detention Operations Manual, Detainee Services, Standard 14, Section I.
186 Detention Operations Manual, Detainee Services, Standard 14, Section I.
187 Notes of delegation member on conversation with Sergeant
188 Notes of delegation member on conversation with Sergeant
190 Detention Operations Manual, Detainee Services, Standard 17, Section III.H.5.
191 Detention Operations Manual, Security and Control, Standard 5, Section III.I.
192 Detention Operations Manual, Security and Control, Standard 5, Section III.H.
193 PRJ Inmate Handbook at 20; notes of delegation member on conversation with Sergeant
194 Notes of delegation member on conversation with Sergeant
A certain level of contact between ICE staff and the staff at a detention facility is necessary to ensure proper oversight of detention conditions. The Standards suggest both weekly ICE visits as well as unscheduled visits.\(^{195}\)

**PRJ meets this section of the Standards.** PRJ staff confirmed that they have both the office and cell phone numbers of ICE staff, and communicate with them regularly. They estimate that they had contact with ICE roughly 3-4 times each week, and it is initiated from both sides.

On our tour of the Facility, an ICE official joined our delegation.\(^{196}\) He works with the PRJ and confirmed that representatives from ICE and the Facility’s staff are often in contact. He also noted that an ICE officer lives in the surrounding area and is in touch with the Facility either by phone or in person roughly three times each week.

### I. Detainee Transfer Policy

The ICE Detention Standard on Detainee Transfer requires the notification of attorneys of detainees who have filed Forms G-28 after the transfer has been made.\(^{197}\) Transfers may be made for the following reasons: medical need, EOIR change of venue, recreation, security and other needs of ICE.\(^{198}\) Prior to transfer, the detainee’s A-file must be organized, and include relevant forms and information.\(^{199}\) Detainees should be given the opportunity to place a phone call after transfer, and should be fed during transfer if longer than six hours or if the transfer is over a meal time.\(^{200}\)

**It appears that ICE meets part of this Standard at PRJ.** We were unable to talk to any detainees who had been transferred, thus all of our information about transfers came from ICE officer.\(^{201}\) According to Officer, ICE notifies attorneys after detainee transfer by phone in most cases, and if not, by letter. If a family member calls, they will be told that the detainee has been transferred, and the new facility will be identified after the detainee has arrived there.\(^{202}\) The vast majority of PRJ immigration detainees are transferred to Hampton Roads or Piedmont, neither of which are more than six hours away.\(^{203}\) If detainees are transferred during meal times, they are fed on arrival at the new facility.\(^{204}\) Detainees who are

---

\(^{195}\) Detention Operations Manual, Detainee Services, Standard 15, Section III.A.

\(^{196}\) Notes of delegation member on conversation with ICE Officer.


\(^{198}\) Detention Operations Manual, Security and Control, Standard 4, Section III.B.

\(^{199}\) Detention Operations Manual, Security and Control, Standard 4, Section III.D.

\(^{200}\) Detention Operations Manual, Security and Control, Standard 4, Section III.G & H.

\(^{201}\) Notes of delegation member based on conversation with.

\(^{202}\) Notes of delegation member based on conversation with.

\(^{203}\) Notes of delegation member based on conversation with.

\(^{204}\) Notes of delegation member based on conversation with.
coming from the Washington metropolitan area are fed at the Fairfax ICE facility. Detainees may keep papers on their person when they are transferred.

V. CONCLUSION

The Pamunkey Regional Jail meets many of the ICE Detention Standards but also fails to meet a number of sections.

- To facilitate legal visitation, PRJ should make it clear to detainees that their attorneys are free to visit them seven days a week by changing the Handbook to conform to PRJ practice.
- To facilitate visitation by family and friends, visitation should be allowed on weekends.
- PRJ should not cut off phone calls before 20 minutes have expired and should not limit legal phone calls unless necessary. To provide adequate telephone access to detainees, PRJ should look into lowering the costs for telephone calls. Presently, the cost appears to be prohibitive to the extent that detainees wishing to make calls cannot do so due to high costs.
- PRJ staff should not record or monitor legal phone calls (absent a court order), and if regular phone calls are monitored, PRJ should provide detainees with the procedure for obtaining an unmonitored call for legal purposes.
- To establish that detainees are properly classified, PRJ staff should put in place procedures that will enable them to more adequately gain information about detainees’ backgrounds and classify them accordingly.
- PRJ staff should create a voluntary work program.

__________________________
205 Notes of delegation member based on conversation with b6
206 Notes of delegation member based on conversation with b6, b7C
Facility Name: Pamunkey Regional Jail, Ashland, VA  
Date of Tour: July 18, 2005  
Tour Participants: Latham & Watkins LLP attorneys and summer associates.

Detainee Services Standards unless otherwise indicated. Issues are listed in the order in which they appear in the Report.

<table>
<thead>
<tr>
<th>ICE Standard*</th>
<th>Delegation Observation</th>
<th>Source</th>
<th>ICE Response</th>
</tr>
</thead>
</table>
| 1. Standard 17, Visitation  
- III.H.1. Visits shall be permitted during set hours on Saturdays, Sundays, and holidays. | Visits are not permitted on weekends. (p.6 ¶2) | Inmate Handbook | |
| 2. Standard 16, Telephone Access  
- III.B. The facility shall provide telephone access rules in writing to each detainee upon admittance, and also shall post these rules where detainees may easily see them. | Telephone access rules are not posted where they can easily be found by detainees. (p.7 ¶1) | Delegation observations | |
| 3. Standard 16, Telephone Access  
- III.E. The facility shall enable all detainees to make calls to the INS-provided list of free legal service providers and consulates at no charge to the detainee or the receiving party.  
- III.F. The facility shall not restrict the number of calls a detainee places to his/her legal representatives, nor limit the duration of such calls by rule or automatic cut-off, unless necessary for security purposes or to maintain orderly and fair access to telephones. If time limits are necessary for such calls, they shall be no shorter than 20 minutes … | Staff explained that the phones had consulate numbers pre-programmed into them. However, there was no individualized listing of such numbers or of numbers for legal services providers by the phones. (p.7 ¶¶5, 4)  
There is a 15-minute time limit on telephone calls made from the housing units. (p.8 ¶2) | Officer delegation observations; Inmate Handbook | |
| 4. Standard 16, Telephone Access  
- III.I. The facility shall take and deliver telephone messages to detainees as promptly as possible. When facility staff receives an emergency telephone call for a detainee, the caller’s name and telephone number will be obtained and given to the detainee as soon as possible. | Incoming phone calls and messages are generally not accepted at the Facility. However, staff will try either to bring the detainee to the phone for a call or, alternatively, try to schedule a call with the attorney soon after a call when the detainee can be brought to the front office to receive the call. (p.8 ¶4)  
The Handbook states that if a message is “verified” as an emergency, it will be delivered to an inmate. (p.8 ¶4) | Inmate Handbook; Officer delegation observations; Inmate Handbook | |
<table>
<thead>
<tr>
<th></th>
<th>Standard 16, Telephone Access</th>
<th></th>
<th></th>
<th>Delegation observations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>III.J. The facility shall ensure privacy for detainees’ telephone calls regarding legal matters. For this purpose, the facility shall provide a reasonable number of telephones on which detainees can make such calls without being overheard by officers, other staff or other detainees. Facility staff shall not electronically monitor detainee telephone calls on their legal matters, absent a court order.</td>
<td></td>
<td></td>
<td>Detainee Handbook; Officer</td>
</tr>
<tr>
<td></td>
<td>The only telephones available to detainees are located in public spaces. (p.9 ¶3)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>While PRJ staff indicated that there was no policy to monitor legal calls actively, the right to do so is explicitly reserved in the Handbook. Moreover, PRJ staff indicated that there may be some random monitoring of phone activity. (p.9 ¶4)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>The only telephones available to detainees are located in public spaces. (p.9 ¶3)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Standard 1, Access to Legal Material</th>
<th></th>
<th></th>
<th>Delegation observations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>III.B. Equipment. The law library shall provide an adequate number of typewriters and/or computers, writing implements, paper and office supplies to enable detainees to prepare documents for legal proceedings.</td>
<td></td>
<td></td>
<td>Officer</td>
</tr>
<tr>
<td></td>
<td>The law library has one computer that delegation members were unable to turn on, and which was not connected to a printer. (p.10 ¶2)</td>
<td></td>
<td></td>
<td>Officer</td>
</tr>
<tr>
<td></td>
<td>Detainees are not routinely provided access to typewriters or computers to prepare legal documents; typing is provided for a fee. (p.10 ¶2)</td>
<td></td>
<td></td>
<td>Officer</td>
</tr>
<tr>
<td></td>
<td>The library does not have a copy of the Florence Project’s “Know your Rights” video. (p.10 ¶4)</td>
<td></td>
<td></td>
<td>Officer</td>
</tr>
<tr>
<td></td>
<td>Delegation observations</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Officer</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Standard 1, Access to Legal Material</th>
<th></th>
<th></th>
<th>Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>I. Facilities … shall permit detainees access to a library, and provide legal materials, … and the opportunity to prepare legal documents.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Detainees may sign up in their housing unit to use the library for one hour, one day per week. Detainees may request additional time. (p.11 ¶3)</td>
<td></td>
<td></td>
<td>Officers and Sgt.</td>
</tr>
<tr>
<td></td>
<td>Officers and Sgt.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>Health Services Standard 2, Medical Care</th>
<th></th>
<th></th>
<th>Pamunkey Regional Jail Operational Standards</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>III.M. Copies of health records may be released by the facility health care provider directly to a detainee, or any person designated by the detainee, upon receipt by the facility health care provider of a written authorization from the detainee.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>The facility only permits detainees to access their medical records through court order. (p.18 ¶2)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>The Facility is generally unable to make appropriate classifications of detainees upon entry to the Facility because the Facility lacks the background information about the detainees needed to make such assessments. The only information provided to the staff is name, country of origin, and alien number. (p.19 ¶3)</td>
<td></td>
<td></td>
<td>Officer</td>
</tr>
<tr>
<td></td>
<td>PRJ strives to classify and segregate detainees when evidence of criminal history and violence is available. (p.19 ¶4)</td>
<td></td>
<td></td>
<td>Officer</td>
</tr>
</tbody>
</table>

ABA Commission on Immigration - Detention Standards Implementation Initiative
<table>
<thead>
<tr>
<th>Standard 4, Detainee Classification System</th>
<th>The Inmate Handbook has a section on classification, but it does not include an explanation of the classification levels with the conditions and restrictions applicable to each. (p.20 ¶6)</th>
<th>Inmate Handbook</th>
</tr>
</thead>
<tbody>
<tr>
<td>III.I. The detainee handbook’s section on classification will include the following: 1. An explanation of the classification levels with the conditions and restrictions applicable to each.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Standard 18, Voluntary Work Program</td>
<td>There is no voluntary work program through which detainees might earn money. (p.20 ¶4) Staff implied that this could be because PRJ is a temporary holding station where detainees are rarely held for more than a month. (p.20 ¶4)</td>
<td>Captain Officer</td>
</tr>
<tr>
<td>I. Every facility with a work program will provide detainees the opportunity to work and earn money.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Standard 17, Visitation</td>
<td>PRJ does not allow detainees in segregation to have any visitation aside from legal visits, and does not allow detainees in segregation to go outside. (p.21 ¶4)</td>
<td>Detainee Handbook; Sergeant</td>
</tr>
<tr>
<td>III.H.5. A detainee shall ordinarily retain visiting privileges while in administrative or disciplinary segregation status. Security and Control Standard 5, Disciplinary Policy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>III.A.3. Staff may not impose or allow imposition of the following sanctions: … deprivation of physical exercise unless such activity creates an unsafe condition.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>