

August 5, 1991
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Introduced by: Lois North

Proposed No.: 91-651

MOTION NO. 8360

A MOTION approving the Stipulation, Order
and Final Judgment in Hammer v. King
County, Cause No. C89-521R

WHEREAS, King County entered into mediation in order to
resolve issues in litigation concerning conditions at the King
County Correctional Facility, and

WHEREAS, the terms of the Stipulation, Order and Final
Judgment will allow King County to resolve the remaining issues
in litigation, and

WHEREAS, the King County executive has approved the terms
of the Stipulation, Order and Final Judgment and has forwarded
the Stipulation, Order and Final Judgment to the council for
approval;

NOW, THEREFORE BE IT MOVED by the Council of King County:

The Stipulation, Order and Final Judgment in Hammer v. King
County, Cause No. C89-521R is hereby approved.

PASSED this 5th day of August, 1991.

KING COUNTY COUNCIL
KING COUNTY, WASHINGTON

Lois North
Chair

ATTEST:

Guadalupe P. P. P.
Clerk of the Council

The Honorable Barbara J. Rothstein

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CALVIN HAMMER, et al.,)	
)	
Plaintiffs,)	NO. C89-521R
)	
vs.)	STIPULATION, ORDER AND
)	FINAL JUDGMENT
KING COUNTY, et al.,)	
)	
Defendants.)	

COME NOW the parties, plaintiffs Hammer, Boekel, Atkins and Stevens and the class of inmates whom they represent, through their counsel of record, Fred Diamondstone, John Midgley and Theodore Spearman, and defendants King County, Tim Hill, Steve Schwalb and Arthur Wallenstein, through their counsel of record, Robert I. Stier and Mary F. Perry, Deputy Prosecuting Attorneys for King County, and for and in consideration of the mutual promises made hereinafter,

STIPULATION, ORDER AND FINAL
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ORIGINAL


1 agree that the Order set forth below shall be entered subject to the
2 approval of the Court and after notice to class members.

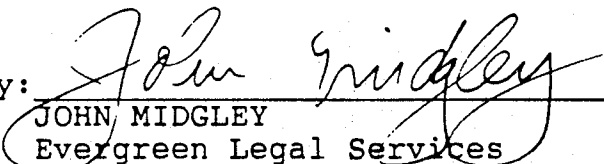
3 DATED: _____, 1991.

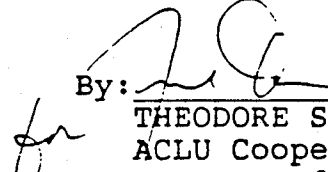
4 Respectfully submitted,
5 NORM MALENG
6 King County Prosecuting Attorney

7 By: _____
8 ROBERT I. STIER
9 Senior Deputy Prosecuting Attorney

10 By: _____
11 MARY F. PERRY
12 Senior Deputy Prosecuting Attorney
13 Attorneys for Defendants

14 By:  _____
15 FRED DIAMONDSTONE
16 ACLU Cooperating Attorney
17 Attorney for Plaintiffs Boekel,
18 Hammer, Stevens and Atkins and for
19 the Class

20 By:  _____
21 JOHN MIDGLEY
22 Evergreen Legal Services
23 Attorney for Plaintiffs Boekel,
24 Hammer, Stevens and Atkins and for
25 the Class

for  _____
THEODORE SPEARMAN
ACLU Cooperating Attorney
Attorney for Plaintiffs Boekel,
Hammer, Stevens and Atkins and for
the Class

ORDER

1
2 THIS MATTER came on for hearing before the Honorable Barbara J.
3 Rothstein, Chief United States District Court Judge. The parties
4 have stipulated and agreed to enter into the Order set forth below.
5 Notice to class members has been issued, as approved by the Court
6 and the Court has considered all class comments from class members
7 that have been received. The Court approves and enters the
8 following Order and Judgment. Now, therefore

9 IT IS HEREBY ORDERED, ADJUDGED AND DECREED:

10 1. Definitions

11 The parties agree that the following definitions shall apply to
12 the terms used in this Stipulation and Order.

13 Close Security Split Housing Area: Transition housing for
14 inmates with behavior problems, either for pre- or post-
15 administrative segregation.

16 King County Correctional Facility (KCCF): Means the facility
17 located on the 500 block of Fifth Avenue in Seattle, Washington.
18 The KCCF, as defined, does not include the work-release facility on
19 the twelfth floor of the King County Courthouse, the North
20 Rehabilitation Facility, or other satellite facility.

21 Tower: For purposes of this order, tower means the housing
22 areas of Floors 7, 8, 9, 10 and 11 of the KCCF. Tower, as defined,
23 does not include the Intake, Transfer and Release (ITR) area of the
24 KCCF.

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STIPULATION, ORDER AND FINAL
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1 2. Pre-Classification System

2 A. Medical/Psychiatric/Suicide Risk Assessment

3 King County will implement a procedure for assessing the
4 medical and/or psychiatric needs and potential suicide risk of
5 incoming inmates. This procedure will require that a pre-book
6 officer ask inmates questions geared to reveal medical and
7 psychiatric problems and evidence risk of suicide. Staffing for
8 this function will be provided seven days per week. This procedure
9 will be implemented in connection with King County's efforts to
10 achieve accreditation of Jail Health Services through the National
11 Commission on Correctional Health Care (NCCHC) as agreed to in the
12 Stipulated Order and Judgment Re Medical Issues entered by the court
13 on June 4, 1991.

14 B. Inmates Transferred From Prisons

15 King County will ask that Washington State Department of
16 Corrections (DOC) facilities provide DAD with information whether
17 individuals transferred to the KCCF from DOC have a history of
18 violent institutional behavior. King County shall consider the
19 information received from DOC in making its determination of where
20 such an inmate shall be housed in the KCCF.

21 King County shall institute a policy to ensure that any inmate
22 transferred to the KCCF from a federal prison or out-of-state prison
23 shall not be housed with the general population of the KCCF until a
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1 classification specialist has made a determination that housing such
2 an inmate with the general population is appropriate.

3 C. Disciplinary Hearings

4 King County will implement a procedure to prioritize
5 disciplinary infractions to ensure that all serious infractions are
6 heard within the time provided in the American Correctional
7 Association (ACA) standards for local jail facilities. King County
8 will make staffing available to ensure that disciplinary hearings
9 are conducted and reported seven days per week. Plaintiffs will
10 raise no objection to efforts by King County to extend the
11 permissible time frame for conducting disciplinary hearings to
12 reflect that contained in the ACA standards.

13 A designated classification specialist will review all serious
14 infraction hearings to identify those inmates whose violent,
15 assaultive or ongoing aggressive behavior in the KCCF warrants the
16 assignment of a positive "Disciplinary History Risk Code." In
17 addition, classification specialists who hear disciplinary
18 infraction cases of lesser severity will forward to the designated
19 classification specialist reports on those inmates whom they believe
20 should be reviewed for consideration for the Disciplinary History
21 Risk Code. King County will ensure that the Disciplinary History
22 Risk Code will be entered into the KCCF information management
23 system.

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STIPULATION, ORDER AND FINAL
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1 King County will review the disciplinary records of inmates who
2 have been housed in the KCCF within one year prior to the
3 implementation of the revised pre-classification procedures to
4 identify those individuals who should be considered for the
5 Disciplinary History Risk Code and will record that information in
6 the KCCF information management system.

7 D. Pre-Classification Identification of Inmates with Records
8 of Violent, Assaultive or Ongoing Aggressive Behavior in
KCCF.

9 King County will implement a procedure to identify and
10 integrate within records systems inmates with documented violent,
11 assaultive or ongoing aggressive behavior in KCCF. As part of
12 implementation of this procedure, King County will develop a
13 "Disciplinary History Risk Code" to identify inmates with
14 documented histories of such behavior. The Disciplinary History
15 Risk Code will be entered in the KCCF information management system.
16 The Disciplinary History Risk Code will be read by a corrections
17 officer during the intake process for each incoming inmate. When a
18 positive notation is read in the inmate's Disciplinary Risk Code,
19 the corrections officer will contact a designated classification
20 specialist for review and selection of an appropriate initial
21 housing assignment consistent with the security requirements of the
22 inmate in question.

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1 3. Classification

2 King County will implement procedures to ensure that all forms
3 (currently known as Form 571's), which are used for the movement of
4 inmates by corrections officers without the intervention of
5 classification specialists, will be reviewed by a Sergeant to ensure
6 that movement of the inmate by the corrections officer is
7 appropriate under the circumstances. All such forms will be
8 referred to the Classification Section for review within one shift
9 after the movement has taken place.

10
11 4. Reclassification

12 King County will continue its policy of reclassification of
13 inmates. Reclassification may occur for the following reasons:

14 Persons who show emerging medical or mental health problems

15 A change in charge status, including sentencing

16 Problematic behavior

17 Protective custody change status

18 Incompatibility with others

19 Keep separate considerations

20 Administrative segregation reviews

21 Disciplinary behavior

22 Review for work release

23 Review for home detention

24 Review for North Rehabilitation Facility

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STIPULATION, ORDER AND FINAL
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1 Review for inmate worker status

2 Review for program consideration

3 Needs of the institution

4 Information received from other criminal justice agencies

5 Information received from outside sources, i.e.,
6 lawyers, parents, friends, etc.

7 Inmate requests for reclassification

8 Upon assignment to a close security split housing area, an inmate
9 will be provided with an explanation of the procedures for
10 requesting reclassification and the appropriate circumstances in
11 which reclassification will occur.

12
13 5. Kite System

14 King County will implement the following procedures to ensure
15 that inmate kites are received by the Classification Section of the
16 KCCF in a timely manner: Classification kites will be readily
17 identifiable by inmates and staff. A supply of classification kites
18 will be made available on an ongoing basis in the KCCF housing
19 areas. All filled-out classification kites will be delivered
20 directly to the classification specialist who is stationed on the
21 floor on which the inmate is housed. King County will construct
22 receptacles for kites to be installed outside housing areas. Only
23 jail staff will be authorized to pick up kites.

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STIPULATION, ORDER AND FINAL
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1 6. Beds

2 A. King County will limit the housing of inmates on
3 mattresses on the floor to no more than a single seventy-two (72)
4 hour period.

5 B. King County will implement a system to monitor inmates
6 assigned to mattresses on the floor, to ensure that any such inmate
7 is assigned to a mattress on the floor for no more than a single
8 seventy-two (72) hour period during each period of incarceration in
9 the KCCF. This provision shall not apply to an inmate assigned to
10 a mattress on the floor for medical or psychiatric reasons. The
11 monitoring system will not be fully implemented until the 272 bunks
12 described in paragraph C below have been installed.

13 C. King County will install two hundred seventy two (272)
14 bunks in the single cell and dormitory areas of Floors 8, 9 and 10
15 of the KCCF. The 272 beds shall be added to the housing areas in
16 conformity with all other applicable provisions of this Order and
17 the following guidelines:

18 North and East Single Cell Housing Units:

19 Additional beds shall not exceed the following:

- 20 / / /
- 21 / / /
- 22 / / /
- 23 / / /
- 24 / / /
- 25 / / /

Floors 8 - 10				
Housing Area	Existing Beds	Added Beds	Total	
Lower A	5	3	8	
Lower B	9	5	14	
Lower C	10	6	16	
Upper A	5	3	8	
Upper B	9	5	14	
Upper C	10	6	16	

These beds shall be added to single cells, not day rooms. No single cell shall be used to house more than two inmates.

Dormitory Housing Areas (Floors 8 - 10):

Additional beds shall be installed in conformity with the following plan:

Housing Area	Existing Beds	Added Beds	Total	
Lower A	11	5	16	
Lower B	12	6	18	
Lower C	12	6	18	
Lower D	11	5	16	
Upper A	11	5	16	
Upper B	12	6	18	
Upper C	12	6	18	
Upper D	11	5	16	

All additional beds shall be upper bunks installed over beds along the walls so as not to interfere with the lines of sight for correctional officers assigned to the south wing officer's station or south wing core area.

Up to twenty additional bunks over and above the 272 bunks indicated above may be added to areas of Floor 7 South that are used to house general population inmates, in conformity with the above plan for dormitory housing areas.

Additional guidelines for the design, fabrication, and installation of these bunks are set forth below.

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1 D. All bunks installed in the KCCF shall have no anchor
2 points. Fabrication and installation of the 272 bunks indicated in
3 paragraph C above will be completed by January 31, 1992 or seven (7)
4 months from the date of approval of the proposed stipulation and
5 order by the King County Council, whichever is later.

6 E. King County will not double cell inmates in those housing
7 areas designated as pre-disciplinary segregation, disciplinary
8 segregation or administrative segregation or close security split
9 housing units.

10 F. No inmate shall be assigned to a mattress on the floor in
11 medical or psychiatric housing areas except upon the approval or
12 direction of medical or psychiatric staff.

13 G. In those units of Floor 7S housing inmates who are
14 assigned to 7S for special custody needs, inmates will not be
15 assigned to a mattress on the floor if medical or psychiatric staff
16 disapprove.

17 H. The population of units on Floor 7S housing inmates under
18 mental health observation shall not exceed the number of inmates
19 equal to the number of beds in the unit as originally designed plus
20 three additional inmates. No inmates under mental health
21 observation shall be housed in any area of the tower containing
22 upper bunks.

23 I. If after installation of the bunks authorized pursuant to
24 paragraphs 6A through H of this Stipulation and Order, King County
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1 determines that additional bunks should be installed in housing
2 areas of the tower portion of the KCCF, King County shall provide
3 plaintiffs' counsel written notice of its installation plan,
4 including the configuration, location, justification and
5 programmatic changes, if any, of the planned bunks not later than
6 one hundred twenty (120) days before installation occurs. King
7 County's counsel will meet and confer with plaintiffs' counsel
8 concerning the proposed installation plans at the request of
9 plaintiffs' counsel.

10 If plaintiffs, after meeting and conferring, give King County
11 notice of objection to the plan, King County will allow plaintiffs'
12 counsel and their experts access to reasonable information relevant
13 to the proposal, including access to affected tower areas, and
14 information relevant to health and safety in the areas of the tower
15 in which the bunks are proposed to be added. After such information
16 is provided, plaintiffs may ask the court for review, but only on
17 the question whether the addition of the proposed bunks will violate
18 the constitutional rights of inmates living in those areas, a
19 question upon which plaintiffs will bear the burden of proof.

20 J. All bunks installed pursuant to this Stipulation and Order
21 shall be temporary and will be removed within a reasonable time
22 following the opening of a new permanent King County correctional
23 facility.
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STIPULATION, ORDER AND FINAL
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1 7. Budget Requests

2 A. Telephone System

3 The Department of Adult Detention (DAD) will request, as part
4 of its 1992 budget submission, funding to improve the KCCF telephone
5 communication system to better facilitate public access to the KCCF.

6 B. Information Management System

7 DAD has requested funding to upgrade its current information
8 management system in a 1991 Supplemental Budget Request. Such
9 funding will be used to improve DAD's ability to compile and track
10 information concerning the frequency, type, seriousness and location
11 of injuries and infractions in the KCCF, suicide attempts and other
12 psychiatric management information, and to provide improved access
13 to escape risk, management risk score and historical information, as
14 well as access to other information of concern to KCCF management.

15
16 DAD will also request, as part of its 1992 budget submission,
17 funding to hire a consultant to evaluate its information system and
18 to assist it in developing the categories of information and types
19 of reports necessary to efficient management of information in the
20 KCCF.

21 C. Classification Positions

22 DAD will request, as part of its 1992 budget submission,
23 funding for two FTE classification specialist positions. The job
24
25

1 description for these positions will include responsibility for
2 reclassification of inmates and classification kite review.

3
4 **8. Monitoring**

5 Defendants shall provide to plaintiffs' counsel copies of the
6 monthly disciplinary report printout and any monthly or other
7 periodic reports developed pursuant to ¶ 7B of this Stipulation and
8 Order. Defendants shall also provide to plaintiffs' counsel a copy
9 of any consultant's evaluation regarding the DAD information
10 management system as identified in ¶ 7B of this Stipulation and
11 Order.

12 Defendants shall provide to plaintiffs' counsel copies of
13 periodic cumulative reports generated by the system developed to
14 monitor inmates assigned to mattresses on the floor pursuant to ¶ 6B
15 of this Stipulation and Order. Such periodic cumulative reports
16 shall be generated at least once per month. Defendants shall grant
17 access to plaintiffs' counsel upon request to information reflecting
18 daily statistics regarding inmates assigned to mattresses on the
19 floor.

20 Defendants shall allow plaintiffs' counsel access upon request
21 to the facility to inspect any physical changes made pursuant to ¶¶
22 5 and 6 of this Stipulation and Order. Defendants shall also
23 provide plaintiffs' counsel access upon request to any policies and
24 procedures developed by the Department of Adult Detention to
25

1 ascertain compliance with §§ 2A, 2B, 2D, 3, 4, 5, 6E, 6F, 6H and 7A,
2 7B, and 7C of this Stipulation and Order.

3
4 **9. Dispute Resolution**

5 In the event the parties disagree over defendants' performance
6 and their obligations under this Stipulation and Order, the parties
7 shall first meet and confer in good faith in order to resolve the
8 disagreement. If the parties are not able to resolve the matter by
9 meeting and conferring, the parties shall submit the matter to a
10 mediator, to be chosen by agreement of the parties, to mediate the
11 issues raised by the parties prior to any motion by plaintiffs to
12 refer the matter to Court.

13
14 **10. Modification**

15 If any provision of this Stipulation and Order becomes
16 impossible of performance or would work an unreasonable hardship on
17 defendants due to circumstances beyond defendants' control, or if it
18 appears that the objectives sought can be better achieved through
19 modification of such provision, then defendants shall submit such
20 proposed modification to counsel for plaintiffs for their review.
21 If approved, an appropriate order shall be forwarded to the court.
22 If not approved:

23 A. Defendants shall file and serve a motion for
24 modification setting forth the precise provision which cannot be
25

1 implemented or should be modified; the reasons therefor; and a
2 detailed proposal for accomplishing the objectives of such
3 provision, including an estimated timetable and any application for
4 modification which would address the problem sought to be remedied.

5 B. Plaintiffs may object to and file a written response
6 to any application within 20 days of notice of the lodging of such
7 application.

8 C. In the event that the court has terminated
9 jurisdiction, as provided in ¶15 below, defendants may at their
10 option elect to achieve the objectives of the proposed stipulation
11 and order by complying with recognized national correctional
12 standards, such as those promulgated by the American Correctional
13 Association.

14
15 11. Issues Resolved

16 This Stipulation and Order, in conjunction with the
17 Stipulation, Order and Partial Judgment, entered by the court on
18 February 27, 1990, and the Stipulated Order and Judgment Re Medical
19 Issues, entered by the court on June 4, 1991, shall collectively
20 operate as a final Judgment with respect to all claims for
21 injunctive or declaratory relief raised by plaintiffs in this
22 action. There is no just reason for delay of entry of this
23 Stipulation and Order as a final Order. The class certified in this
24 action did not seek damages and nothing in this Stipulation and
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STIPULATION, ORDER AND FINAL
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1 Order shall be deemed to waive the rights at law of any person to
2 seek damages. This Stipulation and Order does not resolve or
3 adjudicate the damage claims of the named individual plaintiffs:
4 Calvin Hammer, Melton Atkins, Edward Boekel or Wilborn K. Stevens,
5 which have been previously resolved and settled. Plaintiffs' claims
6 for costs, expenses and attorneys' fees are reserved for
7 determination by the Court at a later date.

8
9 **12. Basis for Order**

10 Due to the resolution of plaintiffs' claims indicated in the
11 preceding paragraph by settlement by and among the undersigned
12 parties, it is not necessary or appropriate for this Court to enter
13 specific findings of fact and conclusions of law at this time. The
14 Court is satisfied from the entire record of proceedings in this
15 action that the remedies contained in this Stipulation and Order are
16 specifically justified as an appropriate basis and consideration for
17 the resolution of the claims settled by this Stipulation and Order.
18 The parties agree that this Court has jurisdiction over the subject
19 matter and the parties, and that this Court has the authority to
20 grant the relief included in this Stipulation and Order.

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STIPULATION, ORDER AND FINAL
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1 13. No Admission of Liability

2 This Stipulation and Order is executed by the parties
3 specifically for the purposes of resolving plaintiffs' claims as
4 indicated in ¶11 above. It is expressly understood and agreed that
5 this Stipulation and Order shall not constitute or be construed as
6 an admission of liability on the part of any of the defendants or as
7 evidencing any admission of the truth or correctness of any claim
8 asserted, or of any violation of law alleged by plaintiffs.

9
10 14. Court Approval

11 It is understood and agreed by the parties that if the Court
12 fails or refuses to approve this Stipulation and Order, it shall
13 become null and void and without any force or effect, and none of
14 the parties shall be bound by it.

15
16 15. Jurisdiction

17 This Stipulation and Order shall be a contract and may be
18 enforced according to the law of contracts of the State of
19 Washington. The court shall retain jurisdiction herein until such
20 time as the court is satisfied that the terms of this Stipulation
21 and Order and the Stipulation, Order and Partial Judgment, entered
22 by the court on February 27, 1990, and the Stipulated Order and
23 Judgment Re Medical Issues, entered by the court on June 4, 1991

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1 have been implemented and that further supervision by the court is
2 therefore unnecessary.

3 **16. Enforcement**

4 This Stipulation and Order as well as the Stipulation, Order
5 and Partial Judgment, entered by the court on February 27, 1990, and
6 the Stipulated Order and Judgment Re Medical Issues, entered by the
7 court on June 4, 1991 shall be contracts and may be enforced
8 according to the law of contracts of the State of Washington in a
9 court of competent jurisdiction.

11 **17. Effective Date**

12 The terms of this Order shall be effective one-hundred twenty
13 (120) days from the date of this Order except as otherwise provided
14 herein.

15 DONE IN OPEN COURT this ___ day of _____, 1991.

17 _____
18 BARBARA J. ROTHSTEIN
19 CHIEF UNITED STATES DISTRICT COURT JUDGE

19 Presented by:

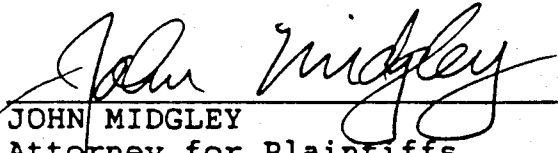
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21 _____
22 FRED DIAMONDSTONE
23 Attorney for Plaintiffs

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STIPULATION, ORDER AND FINAL
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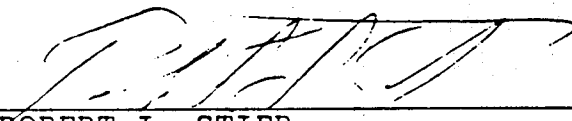
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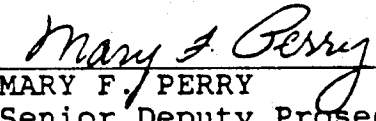
KING COUNTY

By: 
TIM HILL, King County Executive

Approved as to Form:

NORM MALENG
King County Prosecuting Attorney

By: 
ROBERT I. STIER
Senior Deputy Prosecuting Attorney
Attorneys for Defendants

By: 
MARY F. PERRY
Senior Deputy Prosecuting Attorney
Attorneys for Defendants