

**REPORT ON THE
INSPECTION OF**

GRAFTON CORRECTIONAL INSTITUTION

INSPECTION DATE: DEC. 16, 2025



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INTRODUCTION

In the state's 2025-27 biennial budget bill, the 136th General Assembly created the Office of Correctional Facility Inspection Services (CFIS) within the Ohio Attorney General's Office. Established by Ohio Revised Code Section 109.39, CFIS – effective Sept. 30, 2025 – became the primary entity responsible for inspecting Ohio's state correctional institutions, privately operated correctional institutions and youth services facilities. Before that date, the Correctional Institution Inspection Committee (CIIC), a joint committee of the General Assembly, was responsible for inspecting Ohio's correctional institutions and youth facilities. The General Assembly abolished the CIIC and re-constituted it as CFIS in the budget bill.

CFIS's duties are set forth in R.C. 109.39(A), which provides:

“There is, as a section within the office of the attorney general, an office of correctional facility inspection services. The office shall establish and maintain a continuing program of inspection of each state correctional institution used for the custody, control, training, and rehabilitation of persons convicted of crime and of each private correctional facility; any local correctional institution used for the same purposes; and any youth services facility. Each inspection shall include an evaluation of the inmate grievance procedure, compliance with meal requirements, at least one review of rehabilitative or educational programs, and any other compliance area the office determines is appropriate. Not later than the last day of January of each year, the office shall submit a report of its findings from the previous calendar year to the general assembly in accordance with section 101.68 of the Revised Code.”

CFIS is not required to provide a correctional institution or youth facility with advance notice of an inspection, pursuant to R.C. 109.39(A). In addition to its mandatory inspection duties, CFIS may assist the attorney general and correctional facility leadership in developing and evaluating programs to improve the condition or operations of the facilities it is required to inspect. R.C. 109.39(B).

Besides the CFIS inspections, each Ohio Department of Rehabilitation and Correction (DRC) facility undergoes an annual inspection and accreditation by the American Correctional Association (ACA) and an internal management audit (IMA). Although CFIS staff may review and refer to the ACA and IMA findings, CFIS inspections are separate and independent.

To institute the continuing program of inspection required by Ohio law, CFIS, shortly after its formation, began conducting an initial inspection of the DRC and Department of Youth Services (DYS) facilities that had not been inspected by CIIC in 2025. The initial inspections were designed, in part, to help CFIS familiarize itself with each facility, the warden and the staff. Further, each initial inspection allows CFIS to determine what additional data might be needed for future inspections and what inspection methodology is appropriate. This report details the initial inspection of Grafton Correctional Institution (GCI).

GENERAL OVERVIEW

On Dec. 16, 2025, CFIS completed an initial inspection of GCI. Warden Jerry Spatny was notified the day before that CFIS inspectors would arrive at 9 a.m. the following day. CFIS inspectors were at GCI for about four hours. The CFIS team consisted of Dr. James Wesson, chief of inspections, and Deborah Drummond, lead inspector.

GCI is a minimum-/medium-security-level correctional facility for adult men located in Grafton, in Lorain County. The facility has celled units (double occupancy) and dormitory-style units. Each celled unit houses about 125 incarcerated persons (IPs); each dormitory-style unit, more than 200. Each unit was staffed by two correctional officers, a case manager, a sergeant and a unit manager. GCI's maximum capacity is 2,400; on the day of the inspection, it housed 1,664. The facility opened in 1988.

GCI's most recent internal management audit took place on April 8-10, 2025. The annual audit is conducted by an independent auditor, who examines a facility's compliance with ACA's 5th Edition Standards and the 2025 Ohio Standards and Observations, in preparation for the next ACA audit. All institutional work, industry and vocational education programs are also audited.

In the 2025 IMA, Grafton Correctional was found in compliance with 59 of the applicable 64 mandatory ACA standards and all of the applicable 433 non-mandatory ACA standards. GCI was in compliance with 67 of the 74 applicable Ohio standards. The table below illustrates GCI's compliance with ACA and Ohio standards over the past three years:

IMA Audit Scores	2025	2024	2023
ACA Mandatory	100%	100%	100%
ACA Non-mandatory	99.3%	99.3%	99.3%
Ohio Standards	92%	92.4%	92.6%

AREAS INSPECTED BY CFIS

Pursuant to R.C. 109.39, CFIS must inspect the grievance process, food services and an educational or a rehabilitative program. In addition, R.C. 109.39 empowers CFIS to inspect any other area that it deems appropriate. While at GCI, the CFIS team also inspected:

- Medical services
- Recreation area
- Library (including law library)
- Visitation area
- Specialized housing (Normalcy Unit)
- Residential Treatment Unit (housing for IPs with mental disorders)
- Transitional Programming Unit (restrictive housing)

In advance of their arrival, CFIS inspectors requested that the staff provide copies of the previous seven days of administrative duty officer (ADO) reports and the 15 most recent grievances. Upon arrival at the facility, the team was greeted by GCI staff. After brief introductions in the warden's conference room, the inspection led by Warden Spatny, began.

MANDATED AREAS OF INSPECTION

Grievance process

DRC's grievance process, governed by Ohio Administrative Code Section 5120-9-31, consists of three steps. It begins with an IP filing an informal complaint resolution (ICR) with the supervisor of the area in which the IP has a concern. The IP has 14 calendar days from the date of the incident to file an ICR. The inspector of institution services (IIS) has 14 days to respond and has an option to file an extension. If the complaint is not resolved or the IP is dissatisfied with the inspector's decision, the IP can file a grievance to the IIS within 14 days of the ICR response. Or, in cases in which an IP believes that the warden or the IIS was personally and knowingly involved in a violation of a law, rule or policy – or condoned such a violation – the IP can file a grievance directly to the chief inspector.

The institutional inspector investigates a grievance to determine whether any DRC policy, rule or procedural guideline was violated – and either denies or grants the grievance. If the IP is not satisfied with the inspector's decision, the IP can appeal it to the chief inspector. The Office of the Chief Inspector, housed within DRC's central office, makes the final decision for every grievance appealed from the facility level. R.C. 5120.06.

Each IP is issued a tablet computer with access to ViaPath, the system IPs use to file a grievance electronically. Paper grievance forms are available for those who prefer a manual process. The grievance process is designed to help address IP complaints regarding any aspect of institutional life, whether the issue relates to the application of policies or procedures, the conditions of confinement or the actions of institutional staff.

The GCI inspector was unexpectedly out of the office on Dec. 16, 2025. CFIS postponed inspection of the grievance process until Jan. 6, 2026, when the IIS was available to meet and answer questions. During the rescheduled visit in January, CFIS reviewed multiple ICRs and grievances. All of them had been answered promptly, and all of them appropriately cited policy. Grievances and informal complaints had been logged and tracked electronically via the DRC system. CFIS confirmed that the grievance process is accessible to IPs on their tablets. The grievance system appeared to be responsive to IP needs. GCI's inspector offered that Grafton monitors its grievance process and, when necessary, meets with staff for clarification or coaching. No violations of DRC policy were reported or observed.

Food services

The food-services area was inspected to ensure compliance with DRC Policy 60-FSM-02, Food Service Operations, and DRC 60-FSM-06, Safety and Health Protection for Staff and Incarcerated Individuals Assigned to Food Service.¹

Meal sampling

During the inspection, CFIS sampled a lunch of garlic noodles, pizza, carrots, a salad, ranch dressing, cake and a banana. The meal met policy standards for taste and appearance. Temperatures for all

¹ All DRC policies referenced herein are available at: <https://drc.ohio.gov/about/resource/policies-and-procedures/3-policies-and-procedures>.

items served were within DRC Policy 60-FSM-02 (hot foods at or above 140 degrees, cold foods at or below 40 degrees).

Observations

The food-services area was clean and orderly, and the winter menu was posted. Incarcerated food-service workers were appropriately dressed in protective clothing (hair and beard nets, rubber gloves). Uniforms were neat and appeared to be clean. GCI food services offer the IN2Work program, designed to teach skills and provide certifications needed for careers in the culinary arts. Participants were actively engaged in meal preparation.

The kitchen tool room was inspected. There were no broken tools, and all tools were accounted for. Tools not present were replaced with a chit, an object used to mark where the tool should be. A tool control log was being used to indicate the individual to whom the tool was assigned, serving as a safety check. The back-dock area was clean and free of offensive odors. The area surrounding the trash compactor was free of debris. No rodents or pests were observed in the food-services area or on the dock.

The equipment and storage areas were neat and organized; food was properly labeled and dated. All coolers and freezers were in proper working order. The dish room was clean, and dish-washing water temperatures were in compliance with DRC 60-FSM-02. CFIS verified that food-services workers and IP staff had completed sanitation and hygiene training, in compliance with 60-FSM-06. Safe Serv Certification was also verified.

CFIS spoke to 12 IPs in the food-services area; none reported any issues that would constitute a violation of DRC policy. Overall sanitation was appropriate. Proper disinfectants were being used to clean the area. No violations of DRC policy were observed.

Educational or rehabilitative program

DRC, through the Ohio Central School System (OCSS), offers educational programs designed to meet the needs of IPs. The programs include adult education courses, vocational training and technical training, all of which incorporate technology in the programming. Collectively, the programs are designed to enhance IP employability upon release. On the date of the inspection, GCI's academic and career programs included:

- Education:
 - Adult basic education
 - General educational development (GED)
 - Pre-GED
 - Special education
 - Associate and bachelor's degrees through Ashland University
- Apprenticeships:
 - Animal trainer
 - Cook
 - Electrician
 - Food-services manager
 - Heating, ventilation and air-conditioning (HVAC)

- Janitor
- Machine operator
- Materials coordinator
- Microsoft Office certification
- Plumber
- Recovery operator
- Screen printer
- Career/Technical:
 - Business operators' service and support
 - Horticulture
 - Landscape management technician
 - Precision machinist
 - Welding fitter

GCI's literacy, GED and post-secondary programs provide ample educational opportunities for IPs and are aligned with their needs. The vocational training offered aligns with the current job market. CFIS verified the instructors' qualifications; there were no violations of DRC 57-EDU-08, GCI's educational materials and technology were up-to-date. Staff were appropriately logging and tracking enrollment and attendance. Accommodations were available for IPs with learning disabilities.

NON-MANDATED AREAS OF INSPECTION

Medical services

CFIS toured and inspected the medical department and spoke to the staff. The department has a dental area, pill call area, examination rooms and an infirmary. There is office space to accommodate the medical staff (doctor, administrators and nurse practitioners). IPs were receiving medical treatment during the inspection, and the area was extremely clean. There was appropriate health-care and preventative-care signage in the area, and the department was adequately staffed.

Recreation area

CFIS toured and inspected the recreation department and spoke with the director. The area prioritized inmate health and was clean and well-maintained. A full-length basketball court, outdoor rec area, weight training and exercise equipment were available for IP use. All workout equipment was in good order; no major issues were observed. GCI also has a music room with sound engineering, a podcast room with podcast capabilities, and an arts-and-craft room. Appropriate cleaning disinfectants were being utilized. The restrooms were inspected, with no sanitation issues to report. Toilets, sinks and the water fountain were in good working order. No violations of DRC 77-REC-01, Recreation and Leisure Time Activities, were observed or reported.

Library/Law library

GCI Correctional has a newly remodeled library, including a law library. The area was clean and organized. IPs were able to access the Ohio Means Jobs website, which provides specialized employment services, including re-entry resume services to IPs. The general population had access to LexisNexis, both in the library and on their tablets. Re-entry information and hours of operation were visibly posted. The librarian and school principal were both knowledgeable and showed pride in the area. No violations of DRC 58-LIB-01, Comprehensive Library Services, were observed or reported.

Visitation area

GCI's visitation area provides IPs and their families a setting that encourages interaction among family members, especially children. It featured a colorful and adequately stocked children's area as well as an outdoor playground. The visitation area was clean and organized. A vending area was available for visitors to purchase snacks. GCI's visiting hours ran from 8 a.m. to noon and 12:30 p.m. to 4:30 p.m. Wednesdays through Sundays. No violations of DRC 76-VIS-01, Incarcerated Person (IP) Visitation, were observed or reported.

Specialized housing

CFIS toured and inspected GCI's Normalcy Unit, a specialized housing unit that focuses on rehabilitation through peer support and structure. The unit simulates daily community activities. Staff and residents collaborate to foster responsibility and decision-making based on rules, which are enforced using a sanction guide. IPs receive training regarding digital currency, annual residency agreements, the court system, and other aspects of a "normal" life. IPs are permitted to choose their cell wall colors and bed linens. GCI aims to convert all housing units into Normalcy Units to promote group therapy and personal development among IPs. No DRC policy violations were observed reported in the unit during the inspection.

Residential Treatment Unit (RTU)

The CFIS team toured and inspected the RTU, which provides treatment and programming for IPs on the mental-health caseload and those who request counseling. The unit has an outpatient clinic and roughly 60 regular patients; its two crisis-watch cells are typically single occupancy. The unit employs 10 nurses and three social workers, holds regular counseling groups, and offers peer support. IPs in the unit are provided with evidence-based treatment plans. An IP may be able to reduce his sentence by complying with the treatment plan. The RTU is also staffed by an activity therapist and attendants, who assist in directing day-to-day IP activities (e.g. cleaning, hygiene, receiving packages and recreation). No violations of DRC policy violation were observed or reported in the unit.

Transitional Programing Unit (TPU)

The TPU, a restrictive housing area, was clean and orderly. Inspectors verified that IPs housed in the unit had access to their tablets. A peer-support team was present and actively engaged. Peer supporters are IPs trained by the Ohio Department of Behavioral Health to assist IPs who may be in crisis. Peer supporters use their training and their shared experiences with mental-health and/or substance-use issues to help other IPs. Support occurs within the housing unit, outside the clinical setting, and is meant to promote sustained recovery. Peer supporters can become certified prior to release, enhancing their employability.

The unit had adequate reading materials and offered religious services. Recovery services (such as Alcoholics Anonymous) and mental-health programs were also offered. CFIS inspectors examined the unit's sign-in log, DRC 6011, which showed that executive staff were performing rounds in accordance with DRC Policy 50-PAM-02. No sanitation issues were reported or observed during the inspection. Cells that were inspected were in appropriate condition. The TPU laundry area was clean and organized; proper cleaning products were being utilized.

The CFIS team reviewed 10 DRC 4118 reports. A DRC 4118 documents each IP's essential daily functions,

including acceptance or refusal of meals, personal hygiene and recreational activities. Each DRC 4118 is signed or initialed by a staff member to indicate that these necessities have been provided to an IP.

The DRC 4118s reviewed were appropriately completed, with the required dates, times and staff initials documenting the care given. The TPU was appropriately staffed with two officers, a sergeant and a lieutenant. CFIS spoke to numerous IPs in the unit; none reported any major issues that would constitute a violation of DRC policy. No violation of DRC policy was observed or reported in the unit.

MISCELLANEOUS INSPECTION MATTERS

Prison Rape Elimination Act (PREA)

Congress passed PREA in 2003 to provide for the analysis of the incidence and effects of prison rape in federal, state and local institutions. PREA also provides information, resources, recommendations and funding to protect IPs from sexual assaults and rapes. PREA applies to all DRC institutions, including privately operated and juvenile correctional facilities.

The Ohio State Highway Patrol (OSP), the law enforcement agency responsible for investigating criminal offenses inside correctional institutions, tracks sexual assaults using the PREA incident system. CFIS reviewed GCI's PREA reports from that system and found no substantiated cases. PREA signs were appropriately posted throughout the facility (e.g. housing units, recreation area, library, visitation area, education area, front entrance and medical services). Contact information for a local rape-crisis center was posted. No violations of DRC policy were observed or reported.

Staff recruiting and retention

GCI's vacancy rate was lower than 10%. Information about hiring events and job openings was posted.

Naloxone (Narcan) going-home kits

GCI offered Narcan kits to IPs on the day of their release. Each kit contained two doses of naloxone and 10 fentanyl testing strips. The kits are stored in Harm Reduction Vending Machines, which are placed in a discrete area. GCI complied with DRC 10-SAF-20, Naloxone Safety and Health Procedures.

Administrative Duty Officer (ADO) reports

CFIS reviewed the ADO (50-PAM-02) reports from the week before the inspection, which the Grafton staff provided upon request. An ADO report is completed daily by an executive staff member designed to conduct rounds. The rounds cover food services, the visitation area, a housing unit, the recreation area and any other area determined by the warden. Upon completion of the rounds, the ADO summarizes the findings in a report given to the warden's office for review. The report includes the date and time of the rounds, the areas visited, observations, concerns and recommendations. The ADO reports reviewed by CFIS were completed on time and in accordance with policy. No DRC policy (50-PAM-02) violations were reported or observed.

Security/Facilities

Units were clean, organized and appropriately staffed. Restrooms were clean, with all showers, sinks and toilets in good working condition. The units had essential items, including a washer and dryer, ice machines,

water fountains, food-prep area and microwaves. All equipment was in good working order. Cleaning products and supplies were secured appropriately. Dayrooms had televisions and appropriate recreational games and activities. GCI has a officer dining room, which was clean. Fire evacuation plans were visibly posted. Unit team pictures and programming information were posted (staff/incarcerated adult facilitator, date and time of program). After reviewing the DRC 6011 (DRC sign in logbook), executive staff appear to be conducting rounds according to policy (50-PAM-02). No safety or security issues were observed or reported.

CONCLUSION

Overall, GCI was clean. Administrative staff members demonstrated a high level of professionalism and correctional knowledge and were able to answer all questions. Staff consistently modeled positive pro-social behavior for the IPs. Programming and vocational services had a strong focus on preparing IPs for a successful re-entry into society.



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