

RESEARCH MEMO

OCTOBER 2022

Author:

Adaeze Onyimah  
Harvard Law School  
[aonyimah@jd24.law.harvard.edu](mailto:aonyimah@jd24.law.harvard.edu)

## The Adoption of NCCHC Standards Across the United States

### Synopsis

The National Commission on Correctional Health Care<sup>i</sup> (NCCHC) standards serve as recommendations for managing the delivery of medical and mental health care in correctional systems. The NCCHC standards are also the foundation of the NCCHC's accreditation program. In the United States, some states have adopted NCCHC standards directly into the administrative policies or procedures that govern their state correctional facilities. Other states employ third-party health care services within their jails, and mandate that those third-party providers adhere to NCCHC standards. This condition of employment is typically included in a Request for Proposals (RFP) that the state's correctional department publishes to solicit proposals from third-party correctional facility health care providers, such as Centurion Health.<sup>ii</sup>

The research methods detailed within this memorandum yielded the following results: 20 states<sup>iii</sup> correctional departments reference NCCHC standards within their administrative policies or procedures, 5

states<sup>iv</sup> correctional departments have mandated adherence to NCCHC standards within published RFPs, and 5 states<sup>v</sup> showed some other indication of adherence to NCCHC standards, either through their department of corrections' website, legal directives, or other miscellaneous documents that do not qualify as formal policies or procedures. This leaves 20 states<sup>vi</sup> that do not fall under any of the three aforementioned categories.

### Methodology

To identify states that reference NCCHC standards in their administrative policies or procedures, the following phrases were entered into Google: (1) "department of corrections \*state\* 'ncchc'" and (2) "jail code ncchc \*state\*," with each state's name being substituted for \*state\* within the search phrase. "Ncchc" was placed in quotations to ensure that the term was included in each search result. This approach typically yielded either a policy document from the state's department of corrections that referenced NCCHC standards, an RFP mandating adherence to NCCHC

However, if no viable results appeared for a particular state, the search phrases were altered as follows: (1) "department of corrections *\*state\** 'ncchc' pdf" and (2) "jail code ncchc *\*state\** pdf". These searches were meant to restrict the search to results of the file type "pdf," the typical file format for department of corrections administrative policy documents.

Lastly, a third search was executed using the following search term: "*\*state\** department of corrections administrative regulations." This search was more open-ended, and typically led directly to the state's department of corrections administrative policies. Focusing specifically on the policy documents relating to healthcare services (both general health care and mental health care services), a "Command-F" search of "ncchc" was conducted on each individual policy document. This yielded few new results, and provided more examples of policy documents in states already flagged by the first search.

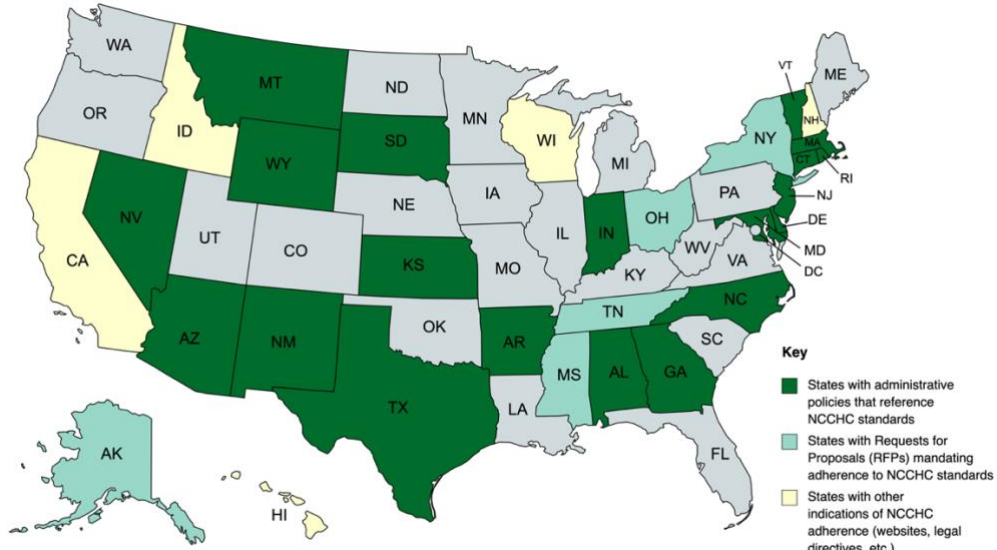
## Tables & Graphs

**Table 1: Overview\***

States with correctional departments that reference NCCHC standards within their administrative policies or procedures	States with correctional departments that mandate adherence to NCCHC standards within published RFPs	States with some other indication of adherence to NCCHC standards (websites, legal directives, etc.)
Alabama Arizona Arkansas Connecticut Delaware Georgia Indiana Kansas Maryland Massachusetts Montana Nevada New Jersey New Mexico North Carolina Rhode Island South Dakota Texas Vermont Wyoming	Alaska Mississippi New York Ohio Tennessee	California Hawaii Idaho New Hampshire Wisconsin

*\*Note:* There is some overlap between the states that reference NCCHC standards within their own administrative rules and procedures, and states that also mandate adherence to NCCHC standards in their RFPs. However, in those cases, the states were placed in the first column in Table 1, and the RFPs are provided as linked documents in Table 3.

**Table 2: Visual Distribution Across the United States\***



\*Note: This map shows 20 states with administrative policies or procedures that reference NCCHC standards (Table 3), 5 states with RFPs mandating adherence to NCCHC standards (Table 4) and 5 states with other indications of NCCHC adherence (Table 5).

**Table 3: States with DOC Policy Documents that Reference NCCHC Standards\***

State	Document & Effective Date	Description
Alabama	<p><a href="#">Alabama Department of Corrections Administrative Regulation #703</a> (Jun. 2013)</p> <p><a href="#">Alabama Department of Corrections Administrative Regulation #700</a> (Nov. 2010)</p>	<p>These policy documents regulate <b>Inmate Co-Payment for Health Services</b> (#703) and the <b>Office of Health Services Division</b> (#700).</p>
Arizona	<p><a href="#">Arizona Department of Corrections Order Manual: Ch. 1100</a> (Oct. 2018)</p> <p><a href="#">Arizona Department of Corrections Health Services Contract Monitoring Bureau Medical Technical Manual</a> (Jul. 2019)</p> <p><a href="#">Arizona Department of Corrections Health Services Contract Monitoring Bureau Medical Technical Manual</a> (Aug. 2018)</p> <p><a href="#">Arizona Department of Corrections Medical Services Division Technical Manual</a> (Dec. 2021)</p>	<p>The first linked document is a policy statement regulating <b>Inmate Access to Health Care</b> (Ch. #1100).</p> <p>The remaining linked documents are technical manuals from the <b>Arizona Department of Corrections Health Services Contract Monitoring Bureau</b>, and are all technical manuals that “provide technical and professional guidance for the delivery of quality health care within the Arizona Department of Corrections facilities.”</p>
Arkansas	<p><a href="#">Arkansas Board of Corrections Administrative Rules</a> (Apr. 1990)</p>	<p>This policy document regulates <b>Health Services</b>.</p> <p><b>NOTE:</b> The term “NCCHC” does not appear within this document. Rather, this document references the “National Commission on Correctional Health” as the</p>

		applicable “Standards for Health Services in Prisons.”
Connecticut	<p><a href="#">State of Connecticut Department of Correction - Directive #8.1</a> (Nov. 2014)</p> <p><a href="#">State of Connecticut Department of Correction - Directive #8.10</a> (May 2017)</p>	These policy documents regulate <b>Scope of Health Services Care</b> (#8.1) and the <b>Performance Monitoring of Healthcare and Healthcare Services</b> (#8.10).
Delaware	<p><a href="#">Professional Services Agreement for Correctional Healthcare Services – the State of Delaware and Centurion</a> (Apr. 2020 – June 2023)</p> <p><a href="#">Delaware Department of Correction Policy #D-07</a> (Oct. 2021)</p> <p><a href="#">Delaware Department of Correction Policy #A-11</a> (Jul. 2013)</p> <p><a href="#">Delaware Department of Correction Policy #E-06</a> (Jul. 2022)</p> <p><a href="#">Delaware Department of Correction Policy #E-01</a> (Oct. 2021)</p> <p><a href="#">Delaware Department of Correction Policy #F-03</a> (Aug. 2022)</p>	<p>The first linked document is a <b>professional services agreement</b> (contract) between the Delaware Department of Correction and Centurion (a third-party health services provider). On page 18, the contract mandates that Centurion shall provide all healthcare services in compliance with NCCHC standards.</p> <p>The remaining linked documents are policy documents that regulate the <b>Medical Emergency Services and Response Plan</b> (#D-07), <b>the Medical Grievance Process</b> (#A-11), <b>Oral Care</b> (#E-06), <b>Information on Health Services</b> (#E-01), and <b>Mental Health Services</b> (#F-03).</p>
Georgia	<p><a href="#">Georgia Department of Corrections Policy #507.04.42</a> (Feb. 2022)</p>	This policy document regulates <b>Infirmatory Care, Observation, and the Accommodative Living Unit</b> .
Indiana	<p><a href="#">State of Indiana Department of Correction Policy and Administrative Procedure Manual – Health Services</a></p>	This policy document regulates <b>Health Services</b> and states that “health services shall be provided in

	(Apr. 2022)	accordance with appropriate standards,” listing NCCHC standards as an example.
Kansas	<p><a href="#">Kansas Department of Corrections - Internal Management Policy and Procedure – #10-106D</a> (Sept. 2015)</p> <p><a href="#">Kansas Department of Corrections - Internal Management Policy and Procedure - #10-122D</a> (Oct. 2015)</p>	These policy documents regulate several Kansas DOC policies, including <b>Intake Screening and Periodic Health Assessments, Management of Serious and Infectious Diseases</b> , etc.
Maryland	<p><a href="#">Maryland Department of Public Safety and Correctional Services Operations Manual – Chronic Disease Management</a> (Feb. 2016)</p> <p><a href="#">Maryland Department of Public Safety and Correctional Services Operations Manual – Infirmiry Care Manual</a> (Feb. 2016)</p> <p><a href="#">Maryland Department of Public Safety and Correctional Services Operations Manual – Medical Evaluations Manual</a> (Feb. 2016)</p> <p><a href="#">Maryland Department of Public Safety and Correctional Services Operations Manual – Pregnancy Management Manual</a> (Feb. 2016)</p> <p><a href="#">Maryland Department of Public Safety and Correctional Services</a></p>	<p>These policy documents regulate several Maryland correctional department policies, including <b>Chronic Disease Management, Infirmiry Care, Medical Evaluations, Pregnancy Management, and Inmate Deaths</b>.</p> <p>The search methods described in this memo also yielded an <b>RFP</b> issued by the Maryland Department of Public Safety and Correctional Services in December 2011, mandating adherence to NCCHC policies for all providers of Inmate Mental Health Care Services. That RFP is linked <a href="#">here</a>.</p>

	<p><a href="#">Operations Manual – Inmate Deaths Manual</a> (Feb. 2016)</p>	
Massachusetts	<p><a href="#">Massachusetts Department of Correction Policy #103 DOC 650</a> (Jul. 2021)</p> <p><a href="#">Massachusetts Department of Correction Policy #103 DOC 601</a> (May 2022)</p>	<p>These policy documents regulate <b>Mental Health Services</b> (#103 DOC 650) and the <b>Division of the Massachusetts DOC Health Services Organization</b> (#103 DOC 601).</p>
Montana	<p><a href="#">Montana Administrative Rule #20.27.201 – PURPOSE</a></p> <p><a href="#">Montana Administrative Rule #20.28.116 - Corrections</a></p>	<p><b>Administrative Rule #20.27.201</b> establishes the licensing requirements for the health of incarcerated individuals in private correctional facilities in Montana, providing that the facility conform to applicable NCCHC standards.</p> <p><b>Administrative Rule #20.28.116</b> states that Montana may deny or revoke the provisional status of a correctional facility's license if it determines that the facility is not in at least 90% compliance with NCCHC standards.</p> <p>Lastly, a statement put out by the Montana Department of Corrections in 2019 claims that DOC <b>follows NCCHC standards</b> in its facilities. See the statement <a href="#">here</a>.</p>
Nevada	<p><a href="#">Nevada Department of Corrections Administrative Regulation #640</a> (Oct. 2012)</p> <p><a href="#">Nevada Department of Corrections Medical</a></p>	<p>The first linked document (#640) regulates standards for <b>Medical Research Experimentation</b>.</p> <p>The second linked document regulates standards for</p>



	<p><a href="#">Directive on Gender Dysphoria</a> (Oct. 2019)</p>	<p><b>Gender Dysphoria</b> treatment. <b>NOTE:</b> This source is not searchable. Please find reference to NCCHC standards on pg. 4.</p>
New Jersey	<p><a href="#">New Jersey Department of Corrections – Health Services Unit Level I Internal Management Procedures</a> (Jan. 2013)</p>	<p>This document regulates standards for <b>Health Appraisals at Reception.</b></p>
New Mexico	<p><a href="#">New Mexico Corrections Department Procedures – Policy #CD-000100</a> (Sept. 2011)</p> <p><a href="#">New Mexico Corrections Department Procedures - Policy #CD-171800</a> (Oct. 2020)</p> <p><a href="#">New Mexico Corrections Department Procedures - Policy #CD-171800</a> (Feb. 2021)</p>	<p>The first linked document (#CD-000100) regulates standards for the <b>Mental Health Treatment Center.</b></p> <p>The second linked document (#CD-171800) regulates standards for <b>Health Services Administration.</b></p> <p>The third linked document (#CD-171800) regulates standards for <b>Dental Services.</b></p>
North Carolina	<p><a href="#">North Carolina Department of Public Safety - Health Services Policy and Procedure Manual Policy #N-5</a> (May 2014)</p> <p><a href="#">North Carolina Department of Public Safety - Health Services Policy and Procedure Manual Policy #AD VII-5</a> (June 2012)</p> <p><a href="#">North Carolina Department of Public Safety - Health Services Policy and Procedure Manual Policy #TX I-13</a> (Aug. 2018)</p>	<p>These policy documents regulate the <b>Management of Offender’s Refusing to Eat</b> (#N-5), <b>Emergency Medical Response Plans</b> (#AD VII-5), and the <b>Evaluation and Management of Transgender Offenders</b> (#TX I-13).</p>

Rhode Island	<p><a href="#">Rhode Island Department of Corrections Policy and Procedure – Policy #8.08-3</a> (Jan. 2022)</p> <p><a href="#">Rhode Island Department of Corrections Policy and Procedure – Prison #9.49-4</a> (March 2018)</p>	<p>The first linked document (#8.08-3) regulates standards for <b>Smoking and Tobacco Regulations</b>.</p> <p>The second linked document (#9.49-4) regulates standards for the <b>Prison Rape Elimination Act Policy</b>.</p>
South Dakota	<p><a href="#">South Dakota Department of Corrections Policy #1.4.E.5</a> (Aug. 2021)</p>	<p>This policy document regulates the <b>Transfer of Inmate Health Records</b>.</p>
Texas	<p><a href="#">Texas Department of Corrections - Correctional Health Care Policy Manual – Policy #G-51.11</a> (Jan. 2017)</p>	<p>This policy document regulates the standards for <b>Patients with Special Health Needs</b>.</p>
Vermont	<p><a href="#">State of Vermont Department of Corrections – Healthcare Services – Policy #351</a> (Nov. 2017)</p>	<p>This policy document regulates the standards for <b>Programs – Healthcare Services</b>.</p>
Wyoming	<p><a href="#">Wyoming Department of Corrections Policy and Procedure – Policy #4.305</a> (Jul. 2020)</p> <p><a href="#">Wyoming Department of Corrections Policy and Procedure – Policy #4.307</a> (Jul. 2020)</p> <p><a href="#">Wyoming Department of Corrections Policy and Procedure – Policy #4.312</a> (Nov. 2019)</p> <p><a href="#">Wyoming Department of Corrections Policy and Procedure – Policy #4.313</a> (Nov. 2019)</p>	<p>These policy documents regulate the standards for <b>Inmate Health Screen and Appraisal</b> (#4.305), <b>Inmate Access to Health Care</b> (#4.307), <b>Communicable Disease and Infection Control</b> (#4.312), and <b>Inmate Mental Health Services</b> (#4.313).</p>

*\*Note:* This table is not meant to list *every* policy statement in which the state referenced NCCHC standards. Rather, it is meant to show which states referenced NCCHC standards in *at least one* of their DOC’s policy statements, though more than one example may have been provided.

**Table 4: States that have mandated adherence to NCCHC standards within published RFPs\***

State	RFP & Issuance Date	Description
Alaska	<a href="#">Alaska Department of Corrections Request for Proposals #2019-2000-4219</a> (Oct. 2019)	This document is an <b>RFP</b> that requires that any contractor seeking to submit a proposal and provide Health Care Services within Alaska correctional facilities must adhere to NCCHC standards.
Mississippi	<a href="#">Mississippi Department of Corrections Request for Proposals #16-009</a> (Dec. 2015)	This document is an <b>RFP</b> that claims that each of Mississippi’s three major facilities (CMCF, MSP and SMCI) are accredited by the NCCHC, and that any Vendor seeking to submit a proposal must comply with all NCCHC accreditation measures established within each facility.
New York	<a href="#">New York Corrections and Community Supervision Request for Proposals #2022-01</a> (Jan. 2022)	This document is an <b>RFP</b> that requires that any contractor seeking to submit a proposal and provide health care services within the correctional facilities must be NCCHC accredited and remain accredited throughout the term of the contract.
Ohio	<a href="#">Ohio Department of Rehabilitation and Correction Request for Proposals #CSP901412</a> (Apr. 2011)	This document is an <b>RFP</b> that penalizes vendors with a price deduction should the contractor fail to comply with NCCHC standards if applicable.
Tennessee	<a href="#">State of Tennessee Department of Correction Request for Proposals #32901-31266</a> (Apr. 2021)	This document is an <b>RFP</b> that states that “all Behavioral Health care services shall ... meet the generally accepted standards of Behavioral Health care as promulgated by the NCCHC.”

\*Note: Again, please note that the search methods described in this memo yielded [an RFP issued by the Maryland Department of Public Safety and Correctional Services](#) in December 2011, mandating adherence to NCCHC policies for all providers of Inmate Mental Health Care Services.

**Table 5: States with some other indication of adherence to NCCHC standards (websites, legal directives, etc.)**

State	Supporting Evidence & Issuance Date	Description
California	<a href="#">Title 15 Minimum Standards for Local Detention Facilities</a> (May 2021)	This document features <b>Proposed Revisions for ESC Initial Review</b> , and claims that California’s current regulation is aligned with the NCCHC standard (J-A-09, Procedure in the Event of an Inmate Death). Pg. 42.
Hawaii	<a href="#">State of Hawaii Department of Public Safety – About Corrections</a>	This website claims that the health care services that are provided by the health care clinics located in every correctional facility in Hawaii are <b>rendered in a manner consistent with the NCCHC</b> . It further claims that all health care clinics’ operations adhere to the NCCHC accreditation standards.
Idaho	<a href="#">Idaho Department of Correction – Health Services</a>  <a href="#">Idaho Department of Correction – Mental Health Services</a>	The first linked website (Health Services) claims that Idaho DOC’s contract medical services provider, Centurion, <b>adheres to NCCHC standards</b> , and the terms of the service contract are used to measure contract compliance.  This second linked website (Mental Health Services)

		claims that <b>all Idaho DOC prisons are accredited through the NCCHC</b> . It also claims that all prisons are periodically audited independently by NCCHC to ensure the highest standard of care are met for ongoing accreditation.
New Hampshire	<p><a href="#">New Hampshire Department of Corrections Website</a> (March 2021)</p> <p><a href="#">New Hampshire Department of Corrections Website</a> (May 2021)</p>	The New Hampshire DOC received a Technical Assistance Proposal in Oct. 2020 from the NCCHC as a result of communications with NCCHC during 2019 on what the most appropriate process would be in the accreditation analysis process. The New Hampshire DOC used the NCCHC standards as a reference to help bring existing practices, policies, and rules in line with NCCHC standards.
Wisconsin	<a href="#">Prison Health Care Evaluation – Department of Corrections</a> (May 2001)	According to this document, the Wisconsin Department of Corrections “currently requires contractors that provide health care services in Wisconsin institutions to be NCCHC-accredited, and it recently completed an internal assessment based on NCCHC standards.” Pg. 8.

**Endnotes**

---

<sup>i</sup> The National Commission on Correctional Health Care, <https://www.ncchc.org/standards/>  
<sup>ii</sup> Centurion Health, <https://www.centurionmanagedcare.com>  
<sup>iii</sup> Alabama, Arizona, Arkansas, Connecticut, Delaware, Georgia, Indiana, Kansas, Maryland, Massachusetts, Montana, Nevada, New Jersey, New Mexico, North Carolina, Rhode Island, South Dakota, Texas, Vermont, Wyoming  
<sup>iv</sup> Alaska, Mississippi, New York, Ohio, Tennessee  
<sup>v</sup> California, Hawaii, Idaho, New Hampshire, Wisconsin.  
<sup>vi</sup> Colorado, Florida, Illinois, Iowa, Kentucky, Louisiana, Maine, Michigan, Minnesota, Missouri, Nebraska, North Dakota, Oklahoma, Oregon, Pennsylvania, South Carolina, Utah, Virginia, Washington, West Virginia