LEGAL AND POLICY ANALYSIS

# Why Delaware DOC Facilities Must Redirect Mail

Transfers, releases, returned mail, legal duties, and the change-of-address excuse

**Scope:** Delaware Department of Correction facilities and contractors
**Date:** August 21, 2026
**Reading level:** Plain-language legal report
**Purpose:** Support a statewide prompt-forwarding policy and individual grievances

## Bottom line

> **"the mail must be redirected to the current address, if known"** *USPS Domestic Mail Manual 508.1.6.1 [2]*

A Delaware DOC facility should not automatically return mail merely because the person was moved. When DOC knows the new address - especially another DOC facility - the current federal postal rule says the institution must redirect the mail. The official USPS interpretation says the same thing. A binding Third Circuit decision also says prison officials have a responsibility to promptly forward mail. Delaware law separately requires DOC to authorize correspondence under reasonable conditions. [1]-[5]

A change-of-address request is helpful, but it is not a condition written into the institution-forwarding rule. It is a backup tool, not a license for DOC to ignore a destination that DOC itself selected and recorded. Automatic return may be proper only when the current address is truly unknown, the mail is lawfully rejected under a valid rule, the addressee actually refused it, or the mail class cannot be forwarded under postal standards.

### Legal-strength guide

| Level | What it means |
|---|---|
| **Direct / strongest** | USPS DMM 508.1.6.1; USPS PS-206; binding Third Circuit decision in Bryan v. Werner; 11 Del. C. § 6537. |
| **Constitutional** | First Amendment communication, notice before rejection, and access to courts when legal mail is involved. Facts and harm matter. |
| **Persuasive examples** | Federal BOP forwarding rule, Simkins, Penton, and Wolfish. Helpful reasoning, but not all are binding in Delaware. |
| **Policy reasons** | Fairness, family contact, reentry, lower cost, accuracy, public trust, and avoiding preventable court or benefit losses. |

# 1. The direct federal postal rule

## 1.1 The Domestic Mail Manual applies

The Domestic Mail Manual is not merely an informal suggestion. Title 39 C.F.R. § 111.1 incorporates the DMM into the federal postal regulations. [1] That does not automatically create a private damages lawsuit, but it makes the DMM the controlling postal standard and gives DOC a poor basis for claiming that an opposite local practice is the postal rule.

> **"The DMM is incorporated by reference into this part"** *39 C.F.R. § 111.1 [1]*

## 1.2 The rule speaks directly to institutions

DMM 508.1.6.1 covers mail addressed to a patient or inmate at an institution. USPS delivers that mail to institutional authorities. If the person is no longer there, the institution has two choices, based on what it knows:

- **Known current address:** redirect the mail to that address.
- **Unknown current address:** endorse the mail properly and return it to the Post Office.

The words are important. The rule does not say, 'return every piece because the inmate did not file a change-of-address form.' It makes knowledge of the current address the dividing line. [2]

## 1.3 USPS's official prisoner-mail ruling confirms the same duty

USPS Customer Support Ruling PS-206 explains mail addressed to prisoners, including forwarding and undeliverable mail. It says the institution must redirect the mail when the person is no longer there. Only when the forwarding address is unknown does the ruling direct return to the Post Office. [3]

> **"If the forwarding address is unknown, the mail is returned to the post office."**
> *USPS Customer Support Ruling PS-206 [3]*

## 1.4 'Return to sender' is not always the same as a proper postal return

If the address is unknown, the institution must endorse the item appropriately and return it to the Post Office. A vague stamp, unexplained return, or direct return that does not follow postal handling rules may prevent the sender from knowing what went wrong. If the institution rejects a letter because of content, contraband, format, or a no-contact order, that is a different decision and should use the applicable notice and review procedure. A transfer should not be mislabeled as a refusal or a mail-rule violation.

PS-206 also distinguishes unopened refusal from mail that was already opened. Once a piece has been opened after delivery, it generally cannot simply be treated as refused

mail. [3] This matters when a facility opens an item, discovers that the person moved, and then tries to send it back without proper remailing procedures.

## 2. Binding Third Circuit law supports prompt forwarding

Delaware is in the United States Court of Appeals for the Third Circuit. In Bryan v. Werner, the Third Circuit considered prison mail and access to courts. It recognized that isolated delays caused by other inmates did not prove state liability on that record. But it stated a clear institutional responsibility:

> **"officials do have a responsibility to promptly forward mail"** *Bryan v. Werner, 516 F.2d 233, 238 (3d Cir. 1975) [4]*

Bryan involved mail sent in care of a prison law clinic after the person was no longer working there. The exact facts are not identical to a facility transfer. Even so, the rule comes from the binding federal appellate court for Delaware and speaks directly about prompt forwarding by prison officials. It is much stronger support than a general fairness argument. [4]

### Why an automatic policy is more serious than one mistake

Bryan declined to grant relief based on two delays caused by inmate workers where state responsibility was not shown. The court said state responsibility could be shown through direct action or complete inattention to continued delays. An announced automatic-return practice is not a random, one-time mistake. It is state policy or repeated state action, which makes the legal concern stronger. [4]

## 3. Delaware statutes support continued correspondence

### 3.1 Delaware law says DOC shall authorize correspondence

> **"shall authorize, under reasonable conditions ... correspondence with, inmates"** *11 Del. C. § 6537(a) [5]*

This statute does not use the word 'forward.' It therefore should not be described as a complete standalone forwarding code. But it does impose a mandatory duty to authorize correspondence under reasonable conditions. Automatically breaking an otherwise lawful line of correspondence because DOC moved the person can conflict with the statute's purpose, especially when routing the mail to another DOC address is simple. [5]

### 3.2 Forwarding fits DOC's rehabilitation and reentry mission

> **"treatment, rehabilitation and restoration of offenders as useful, law-abiding citizens"** *11 Del. C. § 6502(a) [6]*

Mail can contain family support, education, treatment information, job leads, identification records, benefits notices, and legal papers. Destroying continuity at transfer works against preparation for release and aftercare. Delaware law directs that Chapter 65 be liberally construed to carry out its purposes. [6]

### 3.3 The Commissioner controls transfers and operations

The Commissioner has full and active charge of DOC, its facilities, and its services. The Commissioner's duties include operation and management of institutions, training staff, governing transfers, and doing what is necessary to carry out Chapter 65. A facility cannot fairly claim ignorance of a destination created by DOC's own transfer order. [7]

> **"doing any and all things necessary to carry out ... the purposes of this chapter"**
> *11 Del. C. § 6517(11) [7]*

## 4. Constitutional support

### 4.1 Mail carries First Amendment rights for both sides

The Supreme Court has recognized that censorship of direct personal correspondence burdens the speech rights of incarcerated people and their outside correspondents. The outside sender's rights matter too. The institution may adopt reasonable security rules, but it cannot treat communication as having no constitutional value. [8], [10]

> **"First Amendment liberties of free citizens are implicated in censorship of prisoner mail"** *Thornburgh v. Abbott, 490 U.S. 401 (1989) [10]*

### 4.2 Incoming-mail restrictions must have a legitimate penological reason

Under Turner v. Safley, a prison rule that burdens constitutional rights is valid only if it is reasonably related to legitimate penological interests. Courts consider the rational connection, alternative means of communication, impact on staff and resources, and ready alternatives. [9] Applied to automatic returns after a transfer:

- **Rational connection:** forwarding mail already accepted and screened does not ordinarily create a new security problem. The receiving facility can apply its normal screening rules.
- **Alternatives:** telephone and electronic messaging are not complete substitutes for court orders, original records, family letters, or items that must arrive by mail.
- **Burden:** the old facility already must handle and endorse the piece. Looking up a known destination and routing it through DOC's courier or USPS is a limited task.
- **Ready alternatives:** a statewide transfer roster, SBI-number lookup, central mail unit, vendor data feed, or 30-day forwarding procedure can protect mail at low cost.

> **“reasonably related to legitimate penological interests”** *Turner v. Safley, 482 U.S. 78, 89 (1987) [9]*

The Turner standard is deferential to correctional administrators. It is not a guarantee that every challenge will win. Still, an unexplained automatic-return practice is hard to defend when a specific federal postal rule and a ready, low-cost routing option point the other way.

### 4.3 A rejected letter requires basic notice and review

Procunier v. Martinez held that censoring or withholding a particular letter requires minimum procedural safeguards. The inmate must receive notice, the author must have a reasonable opportunity to protest, and a different official should review the complaint. Later cases changed the level of First Amendment review for incoming mail, but the basic notice principle remains important. [8], [10]

> **“minimum procedural safeguards against arbitrariness or error”** *Procunier v. Martinez, 416 U.S. 396, 417-19 (1974) [8]*

A simple transfer-related redirection is not censorship. But if DOC chooses to reject and return mail instead of forwarding it, the people affected should receive the true reason and a way to correct an error. An unexplained return prevents both the sender and the recipient from challenging a wrong facility record or mistaken identity.

### 4.4 Legal mail can involve the constitutional right of access to courts

The strongest constitutional claim arises when failure to forward legal mail hinders a nonfrivolous case: for example, a missed response, appeal, hearing, grievance deadline, or attorney communication. In Simkins v. Bruce, the Tenth Circuit held that intentionally holding transferred legal mail for more than a year could violate access to courts. The person had to show that the non-delivery frustrated, impeded, or hindered a nonfrivolous legal claim; he did not have to prove he would have won the underlying case. [11]

> **“frustrating, impeding, or hindering his efforts to pursue a legal claim”** *Simkins v. Bruce, 406 F.3d 1239 (10th Cir. 2005) [11]*

Penton v. Johnson is an unpublished Ninth Circuit decision and is not binding in Delaware. It is still useful because it collected older cases, cited Bryan, and held that a prolonged failure to forward mail during a temporary transfer could defeat qualified immunity on the record before it. [12]

> **“seriously delay or otherwise fail to forward legal mail ... violate clearly established law”** *Penton v. Johnson (9th Cir. 2023) (unpublished) [12]*

## 5. The change-of-address excuse does not answer the problem

DOC may argue that the person should file a USPS change-of-address request and notify all correspondents. That is good advice, but it does not erase the institution's separate duty. The best replies are below.

1. **The DMM contains no such condition.** DMM 508.1.6.1 says to redirect when the current address is known. It does not say the rule applies only after PS Form 3575 is filed. [2]
2. **DOC usually created and recorded the transfer.** For an internal transfer, DOC has the transfer order, SBI number, receiving facility, and custody record. Calling the destination 'unknown' would usually be factually wrong.
3. **Two responsibilities can exist at the same time.** A person should notify correspondents, and staff should forward mail during the transition. The federal BOP model expressly imposes both duties and still requires 30 days of general-mail forwarding. [14]
4. **Transfers may be sudden.** A person may have no useful advance notice. Mail already in transit cannot be stopped by a last-minute address card.
5. **The sender may not know.** Courts, lawyers, agencies, families, schools, and benefit offices may continue using the last official address until told otherwise.
6. **USPS identity verification may be inaccessible.** USPS says a person must verify identity for a change of address and may need to appear at a Post Office with acceptable photo identification. Many people in custody cannot do that. [15]
7. **A COA is not a perfect solution.** Not every mail class forwards, names may not match, facility addresses may use special routing, and a transfer may be temporary.
8. **Returning also takes work.** Staff still must identify the person as gone, stamp or endorse the piece, log it when required, and place it back into the mail stream. Routing to a known DOC destination may take comparable effort.
9. **DOC cannot create the disruption and shift all risk.** Because DOC controls custody and transfer, it is the party best able to maintain continuity while the person and correspondents update records.
10. **The central scanning system makes routing easier, not harder.** Delaware DOC's public mail page directs much non-legal mail to a central Las Vegas address and uses names and SBI numbers. A current-location data feed should allow routing despite facility changes. [16]

### A court already rejected this exact excuse as poor reasoning

In United States ex rel. Wolfish v. Levi, a federal district court confronted the argument that incarcerated people could send change-of-address notices instead of requiring the jail to forward mail. The court observed that transfers can be sudden, mail may already be in

transit, and the item must be handled either way. [13] Wolfish is persuasive reasoning only; it is not binding Delaware precedent, and later appellate proceedings addressed other parts of the case. Its practical answer to the change-of-address excuse remains useful.

> **"The piece of mail must be handled in any case whether to be returned or sent to its addressee."** *Wolfish v. Levi, 439 F. Supp. 114 (S.D.N.Y. 1977) [13]*

### USPS verification creates a real barrier

> **"To submit a change of address, you must verify your identity."** *USPS Standard Forward Mail [15]*

USPS currently explains that if online verification fails, the customer may need to visit a Post Office with acceptable photo ID. A person at Level V or Level IV usually cannot make that visit. DOC could provide forms and identity-proofing help at transfer or release, but until it does, it should not use lack of a COA as the reason to discard a known routing destination.

## 6. When forwarding is required, strongly supported, or not possible

| Situation | Best legal reading | Proper action |
|---|---|---|
| **Transfer within Delaware DOC** | Current address is ordinarily known. This is the strongest forwarding case. | Promptly route to the receiving facility using the SBI number and normal screening. |
| **Transfer to another jail, state, or federal custody** | If DOC records show the destination, the address is known. | Redirect to the destination or coordinate with the receiving authority. |
| **Temporary writ or court trip** | Location and return date may be known; legal deadlines may run during the trip. | Forward time-sensitive and legal mail; hold only under a reasonable written rule and for a short, defined period. |
| **Release to a known residence, program, or supervision office** | DMM text still turns on whether the current address is known. Privacy and safety must be protected. | Use a confidential forwarding process, central unit, or USPS method; do not disclose a protected address to the sender. |
| **Release with no verified address** | The current address may truly be unknown. | Endorse appropriately and return to the Post Office; give the sender an accurate reason. |
| **Mail violates a lawful content or security rule** | This is rejection, not transfer forwarding. | Use the applicable rule, notice, opportunity to protest, and independent review. |

| Situation | Best legal reading | Proper action |
|---|---|---|
| **Addressee actually refuses the item** | Refusal is separate from a transfer. It should reflect the addressee's decision or a lawful institutional rule. | Follow USPS refusal rules and document the basis; do not falsely mark a transfer as refusal. |
| **Mail class is not forwardable** | Postal treatment may vary by class and endorsement. | Follow USPS treatment for that class and explain the result; preserve legal and special mail where possible. |

## 7. Why forwarding matters beyond the legal text

- **Court access and due process.** Orders, briefing schedules, notices of appeal, hearing dates, discovery, and attorney letters can carry strict deadlines.
- **Attorney-client communication.** Returning legal mail can delay confidential advice and prevent counsel from obtaining signatures or decisions.
- **Family stability.** Transfers already disrupt contact. Forwarding prevents family members from believing they were ignored or blocked.
- **Reentry and rehabilitation.** Mail may include education, treatment, employment, housing, identification, veteran, Social Security, Medicaid, and other transition information.
- **Financial protection.** Returned bills, benefit notices, tax papers, and identity documents can cause lost money, late fees, closed claims, or identity problems.
- **Health and safety.** Time-sensitive medical information, family emergencies, protection orders, or release-plan information may arrive by mail.
- **Accuracy and accountability.** A logged forwarding system creates a record of where an item went. Automatic return hides whether staff checked the correct database.
- **Lower cost for the public.** Forwarding reduces duplicate postage, repeated calls, grievances, court motions, and staff time spent correcting preventable mistakes.
- **Public trust.** Families and advocates reasonably expect one state facility to route mail to another state facility when the person remains in the same statewide system.
- **Fair treatment of people with limited literacy or resources.** Some people cannot complete postal procedures without help, do not know their exact destination in advance, or cannot buy extra postage.

## 8. Common DOC arguments and concise answers

### 'We do not have to forward.'

The current DMM says the institution must redirect if the current address is known, and Bryan says officials have a responsibility to promptly forward mail. [2], [4]

### 'The person should tell the sender.'

Yes, when possible. But that duty coexists with forwarding during the transition and cannot fix mail already in transit. [14]

### 'We do not know the address.'

That may be true after an unplanned release with no destination. It is usually not true after a DOC transfer documented in DACS or another custody record.

### 'Security prevents forwarding.'

Forwarding does not require bypassing screening. The receiving facility applies the same lawful screening rules. A blanket return is broader than needed.

### 'It costs too much.'

Return also requires handling. A database lookup, facility-code label, state courier, or central routing unit is a ready lower-cost alternative.

### 'A contractor handles general mail.'

Contracting out processing does not erase DOC's statutory and managerial responsibility. The contract and data feed should require current-location routing.

### 'The person was released.'

If DOC knows a safe forwarding address, DMM 508.1.6.1 still points to redirection. If truly unknown, proper endorsed return is allowed.

### 'The sender used the old address.'

That is the very situation forwarding rules exist to address. An old address is not proof that the addressee refused the mail.

### 'Other communication methods exist.'

Electronic messaging and calls do not replace original legal documents, court notices, signatures, or correspondence from agencies that use postal mail.

## 9. Recommended statewide rule

DOC should issue one written statewide directive that applies to every Level V, Level IV, community corrections, transportation unit, central mail operation, and mail contractor. The rule should contain the following minimum requirements:

1. Before every planned transfer or release, record a forwarding destination and provide the person with address-change forms and notice cards.

2. When mail arrives for a person who moved, search the current-location record by SBI number before returning the piece.
3. For transfers within DOC, forward promptly for as long as the person remains in DOC custody and the destination is known; do not impose an artificial short cutoff when a current facility remains available.
4. For release or transfer outside DOC, use at least the federal 30-day general-correspondence benchmark, and use all practicable means for legal, court, government, and other time-sensitive mail. [14]
5. Do not return mail merely because no PS Form 3575 was filed when DOC independently knows the current destination.
6. Keep legal and privileged mail sealed and tracked; send it by a method that documents the old facility's receipt and the new facility's acceptance.
7. If an address is truly unknown, endorse the item accurately and return it to the Post Office under DMM 508.1.6.1.
8. If mail is rejected for a rule violation, notify the recipient and sender of the specific reason, the rule, and how to appeal or correct it.
9. Protect confidential release addresses. Forward through a central unit or confidential postal method without unnecessarily disclosing the destination to the sender.
10. Require the scanning contractor to receive daily current-location updates keyed to the SBI number and prohibit automatic return based only on an old facility code.
11. Audit monthly: pieces forwarded, pieces returned, reasons, average routing time, legal-mail exceptions, and complaints sustained.
12. Train mailroom, records, transport, intake, release, and vendor staff; hold supervisors accountable for repeated avoidable returns.

## 10. How to document and challenge the practice

### 10.1 Preserve proof

- Keep the complete returned envelope, every label, barcode, postmark, stamp, and handwritten note.
- Photograph both sides before remailing anything.
- Record the date sent, date received back, old facility, known new facility, SBI number, and mail type.
- Obtain proof of the transfer date and destination from a public locator, court record, counsel, or the person in custody.
- For legal mail, preserve the court deadline, docket entry, attorney letter, and any harm caused by delay.

- Collect more than one example if the problem is systemic. A policy or pattern is easier to prove than a single negligent mistake.

### 10.2 Use the grievance process and ask for specific relief

A person still in custody should use and complete DOC's available grievance and appeal process. The federal Prison Litigation Reform Act generally requires exhaustion before a prison-conditions action under 42 U.S.C. § 1983 or another federal law. [18] Keep copies and dates. If staff block the process, document exactly how the remedy was unavailable.

> **"until such administrative remedies as are available are exhausted"** *42 U.S.C. § 1997e(a) [18]*

Requested relief should include: forward the identified item; correct the current address; stop automatic returns; issue a written statewide instruction; train staff; provide sender and recipient notice; preserve mail logs and video; and reimburse documented duplicate postage where authorized.

### 10.3 Ask USPS to enforce its delivery rule

Send the evidence and a short written complaint to the Postmaster serving the old facility and request review under DMM 508.1.6.1 and Customer Support Ruling PS-206. Ask the Postmaster to tell the institution how to redirect known-address mail and how to endorse unknown-address mail. A USPS complaint is especially useful because DOC may treat this as a prison-policy issue while USPS treats it as a condition of mail delivery.

### 10.4 Escalate within Delaware

Send the same packet to the Warden, Bureau Chief, Commissioner, DOC Office of Community Relations, and the Council on Correction. As of this report date, the Council's statutory goals include improving DOC policy efficiency, accountability, and the Department's relationship with the public. [17]

> **"Enhance the efficiency of Department of Correction policies."** *29 Del. C. § 8905(a)(2) [17]*

### 10.5 Act quickly if a deadline was missed

If the returned item involved a court, lawyer, benefit, medical issue, or other deadline, contact the court or agency immediately. File the appropriate request for an extension, reopening, reconsideration, or relief and attach the envelope and transfer proof. The correct motion and deadline depend on the court and case. Do not wait for the grievance to finish before protecting an outside deadline.

## 11. Ready-to-use argument

Delaware DOC should immediately end the automatic return of mail for people whose current location is known. The Domestic Mail Manual, incorporated into federal postal regulations by 39 C.F.R. § 111.1, states that when an inmate is no longer at an institution, the mail must be redirected to the current address if known. USPS Customer Support Ruling PS-206 confirms that the institution redirects the mail and returns it only when the forwarding address is unknown. The Third Circuit, whose decisions bind federal courts in Delaware, has also stated that prison officials have a responsibility to promptly forward mail. Bryan v. Werner, 516 F.2d 233, 238 (3d Cir. 1975). Delaware law separately requires DOC to authorize correspondence under reasonable conditions. 11 Del. C. § 6537(a). A USPS change-of-address request may help, but it is not a condition stated in DMM 508.1.6.1 and cannot excuse DOC from using a transfer destination in its own records. Please forward all mail on hand, correct the recipient's address, issue a statewide routing directive, provide written reasons and review rights for any actual rejection, and train all facilities and contractors.

## 12. Important limits and cautions

- Not every returned item is unlawful. Return may be proper when the current address is genuinely unknown or the item is lawfully rejected, actually refused, or nonforwardable under postal rules.
- DMM noncompliance is strong evidence and a basis for USPS and policy enforcement, but the DMM may not itself provide a private right to money damages.
- A constitutional damages claim normally needs intentional or systemic interference, personal involvement, and other elements. A single negligent delay may not be enough. Bryan itself drew that distinction. [4]
- For an access-to-courts claim, the person generally must show that the mail problem hindered a nonfrivolous legal matter. [11] A free-speech or notice claim may use a different injury analysis.
- Qualified immunity, sovereign immunity, limitation periods, PLRA exhaustion, and proof problems can restrict available relief. Injunctive or policy relief may be more practical than damages.
- This report provides legal information and advocacy arguments, not legal advice for a particular case. A licensed lawyer should review any planned lawsuit or emergency filing.

## Appendix A. Short quotations from the main authorities

*Each quotation below is intentionally short. The linked source should be read in full before filing it in court.*

**[1] 39 C.F.R. § 111.1:** *"The DMM is incorporated by reference into this part."* Direct federal regulation.

**[2] DMM 508.1.6.1:** *"the mail must be redirected to the current address, if known"* Direct institution-forwarding rule.

**[3] USPS PS-206:** *"If the forwarding address is unknown"* Official USPS interpretation; the fuller excerpt appears in § 1.3.

**[4] Bryan v. Werner:** *"officials do have a responsibility to promptly forward mail"* Binding Third Circuit authority.

**[5] 11 Del. C. § 6537(a):** *"shall authorize, under reasonable conditions ... correspondence with, inmates"* Delaware statutory duty.

**[6] 11 Del. C. § 6502(a):** *"treatment, rehabilitation and restoration of offenders as useful, law-abiding citizens"* Delaware statutory purpose.

**[7] 11 Del. C. § 6517(11):** *"doing any and all things necessary to carry out ... the purposes of this chapter"* Commissioner's operational responsibility.

**[8] Procunier v. Martinez:** *"minimum procedural safeguards against arbitrariness or error"* Notice and review for rejection or withholding.

**[9] Turner v. Safley:** *"reasonably related to legitimate penological interests"* Constitutional reasonableness standard.

**[10] Thornburgh v. Abbott:** *"First Amendment liberties of free citizens are implicated in censorship of prisoner mail"* Outside correspondents also have rights.

**[11] Simkins v. Bruce:** *"frustrating, impeding, or hindering his efforts to pursue a legal claim"* Legal-mail actual injury.

**[12] Penton v. Johnson:** *"seriously delay or otherwise fail to forward legal mail ... violate clearly established law"* Persuasive, unpublished decision.

**[13] Wolfish v. Levi:** *"must be handled in any case"* Persuasive response to the COA excuse; the fuller excerpt appears in § 5.

**[14] 28 C.F.R. § 540.25(f):** *"Staff shall forward inmate general correspondence to the new address for a period of 30 days."* Federal BOP model, not binding on Delaware DOC.

**[15] USPS Standard Forward Mail:** *"To submit a change of address, you must verify your identity."* Practical access barrier.

**[16] Delaware DOC mail page:** *"a centralized mail scanning system will be used"* Existing centralized routing infrastructure.

**[17] 29 Del. C. § 8905(a)(2):** *"Enhance the efficiency of Department of Correction policies."* Council on Correction goal.

**[18] 42 U.S.C. § 1997e(a):** *"until such administrative remedies as are available are exhausted"* Litigation caution.

## Appendix B. Sources and links

*Sources were checked online on August 21, 2026. Court opinions hosted by legal databases reproduce the cited judicial text; verify official reporters before filing.*

**[1]** 39 C.F.R. § 111.1 - Incorporation of the Domestic Mail Manual

**[2]** USPS Domestic Mail Manual 508.1.6.1 - Patient or Inmate

**[3]** USPS Customer Support Ruling PS-206 - Mail Addressed to Prisoners

**[4]** Bryan v. Werner, 516 F.2d 233 (3d Cir. 1975)

**[5]** 11 Del. C. § 6537 - Inmate contacts outside institution

**[6]** 11 Del. C. § 6502 - Purposes and construction; custody of inmates

**[7]** 11 Del. C. §§ 6516-6517 - Commissioner in charge; duties

**[8]** Procunier v. Martinez, 416 U.S. 396 (1974)

**[9]** Turner v. Safley, 482 U.S. 78 (1987)

**[10]** Thornburgh v. Abbott, 490 U.S. 401 (1989)

**[11]** Simkins v. Bruce, 406 F.3d 1239 (10th Cir. 2005)

**[12]** Penton v. Johnson, No. 22-15665 (9th Cir. Oct. 30, 2023) (unpublished)

**[13]** United States ex rel. Wolfish v. Levi, 439 F. Supp. 114 (S.D.N.Y. 1977)

**[14]** 28 C.F.R. § 540.25 - Federal Bureau of Prisons forwarding rule

**[15]** USPS - Standard Forward Mail and identity verification

**[16]** Delaware DOC - Mail to Inmate

**[17]** 29 Del. C. § 8905 - Council on Correction

**[18]** 42 U.S.C. § 1997e(a) - Exhaustion of available administrative remedies