

March 14, 2019

TO: [REDACTED]
Assistant Director for Detention Management

FROM: [REDACTED]
Lead Compliance Inspector
The Nakamoto Group, Inc.

SUBJECT: **Annual Detention Inspection of the Pulaski County Detention Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 of the Pulaski County Detention Center in Ullin, Illinois during the period of March 12-14, 2019. This is an IGSA facility.

The inspection was performed under the guidance of [REDACTED], Lead Compliance Inspector. Team Members were:

Subject Matter Field	Team Member
Security	[REDACTED]
Medical Care	[REDACTED]
Safety	[REDACTED]
Medical Care	[REDACTED]
Detainee Rights	[REDACTED]

Type of Inspection

This is a scheduled annual inspection, which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72 hour facilities. The facility received a previous rating of Meets Standards during the March 2018 inspection.

Inspection Summary

The Pulaski County Detention Center is currently accredited by:

- The American Correctional Association (ACA) - No
- The National Commission on Correctional Health Care (NCCHC) - Yes
- The Joint Commission (TJC) - No
- Prison Rape Elimination Act (PREA) - Yes

Standards Compliance

The following information is a summary of the standards that were reviewed and overall compliance that was determined as a result of the 2018 and 2019 annual compliance inspection:

<i>2018 Annual Inspection</i>	
Meets Standards	42
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	0

<i>2019 Annual Inspection</i>	
Meets Standards	41
Does Not Meet Standards	0
Repeat Deficiency	0
Not Applicable	1

The inspection team identified four (4) deficient components in the following three (3) standards:

Correspondence and Other Mail - 1 (repeat deficiency)
 Funds and Personal Property - 1 (repeat deficiency)
 Special Management Units – 2 (one of which is a repeat deficiency)

Facility Snapshot/Description

The Pulaski County Detention Center is owned and operated by Pulaski County. The facility is located on the southern tip of Illinois; approximately thirty miles north of Paducah, Kentucky. [REDACTED]

[REDACTED] The facility houses all classification levels of male ICE detainees. Low and medium low custody female detainees are housed in the Pulaski County Detention Center. ICE detainees are not housed with any other jurisdiction.

The facility is a single structure building built in 1997 [REDACTED]. There are seven housing units. Five housing units are dedicated to ICE detainees. The housing units range from 50 bed dormitories to two bed cell configurations. The exterior walls of the facility serve as its secure perimeter. The perimeter is patrolled by an unarmed detention officer at least once each shift. The entire perimeter is under camera surveillance. All exterior doors are alarmed and monitored by the control center.

Detainees are monitored through indirect supervision. There is one elevated control tower that is centered and rises above the round pie-shaped layout of housing units. This center post configuration provides 360-degree high ground sight lines into each of the contiguous housing units. ICE detainees hold work assignments at this facility. The indoor and outdoor recreation areas are large enough to accommodate all populations. There is one indoor gymnasium and two outdoor recreation areas furnished with exercise equipment.

Detainees spend the majority of their time socializing in the dayrooms, watching television, working, or participating in indoor/outdoor recreation activities. Each housing unit dayroom is furnished with wall mounted televisions, a microwave, board games, and two Homewavs (web-based video-visitation monitors) which permit remote visitation 24 hours a day. Facility employees were knowledgeable of the daily schedule, their responsibilities during emergency situations, and the requirements of the ICE standards.

Approximately 85 LEP and English-speaking ICE detainees were interviewed in open as well as confidential settings. There were no issues regarding living conditions, health care, ICE officer access, food, programs, services, and treatment by staff. Using the language line, confidential interviews were conducted with twelve LEP detainees. The detainees stated that they were receiving services, offered recreation frequently, and did not fear for their safety. Detainees were pleased with food services. One detainee stated that she had been at the facility for fifty days and had not seen or spoke to an ICE official. The detainee



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was referred to the assigned ICE officer who interviewed her the same day. There were no concerns regarding access to telephones, law library, or sending and/or receiving mail.

Advanced Correctional Health Services provides medical services. All other services are provided by Pulaski County employees. ICE detainees do not incur medical co-payments. The facility maintains an average level of cleanliness and sanitation.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards. The facility complies with the ICE Performance Based National Detention Standards (PBNDS) 2011. Forty-one (41) standards were found to Meet Standards. One standard was found Not Applicable.

LCI Assurance Statement

The findings of Meets Standards and Does Not Meet Standards are accurately and completely documented on the G-324 Inspection Form and are supported by documentation in the inspection file. An out brief was conducted at the facility and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials - [REDACTED] (telephonically)
- Facility Staff - [REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector
Printed Name of LCI

March 14, 2019
Date