

October 24, 2019

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Douglas County Department of Corrections**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2008; 2011 SAAP) of the Douglas County Department of Corrections Facility in Omaha, Nebraska during the period of October 22 - 24, 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
Detainee Rights	[REDACTED]
Security	[REDACTED]
Medical Care	[REDACTED]
Safety	[REDACTED]

Type of Inspection

This is a scheduled annual inspection, which is performed to determine overall compliance with the ICE PBNDS 2008 for Over 72 hour facilities. The facility received a previous rating of Meets Standards during the October 2018 inspection.

Inspection Summary

The Douglas County Department of Corrections is currently accredited by

- The American Correctional Association (ACA) - Yes
- 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 inspections:

<i>2018 Annual Inspection</i>	
Meets Standards	39
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	2

<i>2019 Annual Inspection</i>	
Meets Standards	39
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	2

The inspection team identified thirteen (13) deficient components in the following six (6) standards:

- Sexual Abuse and Assault Prevention and Intervention - 1
- Special Management Units - 3
- Staff-Detainee Communication - 1
- Food Service - 5
- Medical Care - 1, which is a priority component
- Law Library and Legal Material - 2

Facility Snapshot/Description

The Douglas County Department of Corrections is a [REDACTED] maximum security jail facility located in downtown Omaha, Nebraska. The facility is owned and operated by the Douglas County Board of Corrections. Currently a project to renovate all housing units is in progress. Two housing units (E and F) are under renovation and as a result 72 beds are not available for use. The facility houses adult male and female ICE detainees, Nebraska Department of Corrections inmates, U.S. Marshals Service detainees, and local county inmates. ICE detainees of all custody levels are housed in this facility. [REDACTED]

The facility is a four-story building comprised of both direct and indirect detainee supervision. Detainees are housed in both cells and dormitories. ICE detainees are housed with other detainees of the same security classification levels. The housing units provide adequate open space for leisure time activities. Due to a facility renovation project currently in progress, the gymnasium is not available and indoor recreation is limited to day room activities in each housing unit that include television, leisure reading, playing cards and board games. Currently all recreation is outdoors. Once the renovation project is completed, both outdoor and indoor recreation areas will be available on a regular basis.

The inspection team interviewed ICE detainees in a private setting including LEP detainees. Confidential detainee interviews gave no indication of any issues or concerns and interviews with LEP detainees revealed that they had no problems obtaining services. Detainees voiced general satisfaction with living conditions and with access to the law library, facility personnel, telephones, health care, mail, visitation, and translation services if needed. There were no complaints or issues related to the quality of life. All detainees stated that they felt safe at the facility. Detainees were familiar with ICE officers and understood how to obtain assistance from them.

Detainee telephone services are provided by GTL. Food services are provided by Aramark Correctional Services. Medical services are provided by Wellpath. All other services are provided by Douglas County employees.

The housing units provide adequate open space and detainees were observed socializing in the dayrooms and watching television. The atmosphere in all areas of the facility was relaxed; detainees were observed interacting in a positive manner with facility staff and other detainees.

All areas of the facility were visited during the inspection and it was noted that sanitation is average throughout. The facility does not charge co-pays for medical, mental health, or dental care.

Areas of Concern/Significant Observations

Priority Component Rated Does Not Meet Standard

Medical Care

Component #31: Any detainee referred for mental health treatment shall receive a comprehensive evaluation by a licensed mental health provider as clinically necessary, but no later than fourteen days of the referral. The provider shall develop an overall treatment/management plan that may include transfer to a mental health facility if the detainee's mental illness or developmental disability needs exceed the treatment capability of the facility.

Finding: The review of ten detainee health records revealed that fifty percent of the detainees referred for mental health evaluation as a result of in-processing mental health screenings did not receive the screening within fourteen days of the referral.

Recommendation: Develop and implement procedures to ensure any detainee referred for mental health treatment receives a comprehensive evaluation by a licensed mental health provider as clinically necessary, but no later than fourteen days of the referral.

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 2008 and 2011 SAAP and Significant Self-Harm and Suicide Prevention and Intervention. No (0) standards were found Does Not Meet Standard and two (2) standards were Not Applicable (N/A). All remaining thirty-nine (39) standards were found to be in compliance.

LCI Assurance Statement

The findings of compliance and non-compliance 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 – There were no ICE personnel present during the out brief.
- Facility Staff – [REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector

October 24, 2019

Printed Name of LCI

Date