

Department Of Homeland Security  
Immigration and Customs Enforcement

Detention Review Summary Form  
Facilities Used Over 72 hours

**A. Type of Facility Reviewed**

- ☐ ICE Service Processing Center  
☐ ICE Contract Detention Facility  
☒ ICE Intergovernmental Service Agreement

**B. Current Inspection**

Type of Inspection  
☐ Field Office ☒ HQ Inspection

Date[s] of Facility Review  
1/15/2019 - 1/17/2019

**C. Previous/Most Recent Facility Review**

Date[s] of Last Facility Review  
1/17/2018 - 1/19/2018

Previous Rating  
☒ Meets Standards ☐ Does Not Meet Standards

**D. Name and Location of Facility**

Name  
Imperial Regional Detention Facility

Address (Street and Name)  
1572 Gateway Road

City, State and Zip Code  
Calexico, CA 92231

County  
Imperial

Name and Title of Facility Administrator  
(Warden/OIC/Superintendent)  
[REDACTED]

Telephone # (Include Area Code)  
[REDACTED]

Field Office / Sub-Office (List Office with oversight responsibilities)  
San Diego

Distance from Field Office  
120 miles

**E. ICE Information**

Name of Inspector (Last Name, Title and Duty Station)  
[REDACTED] / LCI / Nakamoto Group

Name of Team Member / Title / Duty Location  
[REDACTED] / Medical SME / Nakamoto Group

Name of Team Member / Title / Duty Location  
[REDACTED] / Safety/Food Service SME / Nakamoto Group

Name of Team Member / Title / Duty Location  
[REDACTED] / Security SME / Nakamoto Group

Name of Team Member / Title / Duty Location  
[REDACTED] / Medical SME / Nakamoto Group

**F. CDF/IGSA Information Only**

Contract Number [REDACTED] Date of Contract or IGSA [REDACTED]

Basic Rates per Man-Day  
[REDACTED]

Other Charges: (If None, Indicate N/A)  
[REDACTED]

Estimated Man-days Per Year  
[REDACTED]

**G. Accreditation Certificates**

List all State or National Accreditation[s] received:  
ACA and NCCHC

☐ Check box if facility has no accreditation[s]

**H. Problems / Complaints (Copies must be attached)**

The Facility is under Court Order or Class Action Finding  
☐ Court Order ☐ Class Action Order

The Facility has Significant Litigation Pending  
☐ Major Litigation ☐ Life/Safety Issues

☒ Check if None.

**I. Facility History**

Date Built  
[REDACTED]

Date Last Remodeled or Upgraded  
[REDACTED]

Date New Construction / Bedspace Added  
[REDACTED]

Future Construction Planned  
☐ [REDACTED] ☒ [REDACTED] Date: [REDACTED]

Current Bedspace [REDACTED] Future Bedspace (# New Beds only)  
Number: [REDACTED] Date: [REDACTED]

**J. Total Facility Population**

Total Facility Intake for previous 12 months  
[REDACTED]

Total ICE Mandays for Previous 12 months  
[REDACTED]

**K. Classification Level (ICE SPCs and CDFs Only)**

	L-1	L-2	L-3
Adult Male	N/A	N/A	N/A
Adult Female	N/A	N/A	N/A

**L. Facility Capacity**

	Rated	Operational	Emergency
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**M. Average Daily Population**

	ICE	USMS	Other
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**N. Facility Staffing Level**

Security: [REDACTED] Support: [REDACTED]

### **Significant Incident Summary Worksheet**

For The Nakamoto Group to complete its review of your facility, the following information must be completed prior to the scheduled review dates. The information on this form should contain data for the past twelve months in the boxes provided. The information on this form is used in conjunction with the ICE Detention Standards in assessing your Detention Operations against the needs of the ICE and its detained population. This form should be filled out by the facility prior to the start of any inspection. Failure to complete this section will result in a delay in processing this report and the possible reduction or removal of ICE' detainees at your facility.

<b><i>Incidents</i></b>	<b><i>Description</i></b>	<b>Jan – Mar</b>	<b>Apr – Jun</b>	<b>Jul – Sept</b>	<b>Oct – Dec</b>
Assault: Offenders on Offenders <sup>1</sup>	Types (Sexual <sup>2</sup> , Physical, etc.)	P	P	P	P
	With Weapon	0	0	0	0
	Without Weapon	8	7	16	10
Assault: Detainee on Staff	Types (Sexual Physical, etc.)	P	P	P	P
	With Weapon	0	0	0	0
	Without Weapon	1	0	1	3
Number of Forced Moves, incl. Forced Cell moves <sup>3</sup>		1	3	4	5
Disturbances <sup>4</sup>		0	0	0	0
Number of Times Chemical Agents Used		0	0	0	0
Number of Times Special Reaction Team Deployed/Used		0	0	0	0
# Times Four/Five Point Restraints applied/used	Number/Reason (M=Medical, V=Violent Behavior, O=Other)	0	0	0	0
	Type (C=Chair, B=Bed, BB=Board, O=Other)	0	0	0	0
Number of Times Canines Used in Facility		0	0	0	0
Offender / Detainee Medical Referrals as a result of injuries sustained.		2	0	5	1
Escapes	Attempted	0	0	0	0
	Actual	0	0	0	0
Grievances:	# Received	58	102	55	64
	# Resolved in favor of Offender/Detainee	5	5	2	12
Deaths	Reason (V=Violent, I=Illness, S=Suicide, A=Attempted Suicide, O=Other)	0	0	A	A
	Number	0	0	1	1
Psychiatric / Medical Referrals	# Medical Cases referred for Outside Care	102	110	147	128
	# Psychiatric Cases referred for Outside Care	2	2	1	3

<sup>1</sup> Any attempted physical contact or physical contact that involves two or more offenders

<sup>2</sup> Oral, anal or vaginal penetration or attempted penetration involving at least 2 parties, whether it is consenting or non-consenting

<sup>3</sup> Routine transportation of detainees/offenders is not considered "forced"

<sup>4</sup> Any incident that involves four or more detainees/offenders, includes gang fights, organized multiple hunger strikes, work stoppages, hostage situations, major fires, or other large scale incidents.

DHS/ICE Detention Standards Review Summary Report					
1. Meets Standards   2. Does Not Meet Standards   3.Repeat Finding   4. Not Applicable		1	2	3	4
<b>PART 1 SAFETY</b>					
1	Emergency Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2	Environmental Health and Safety	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3	Transportation (By Land)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>PART 2 SECURITY</b>					
4	Admission and Release	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5	Classification System	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6	Contraband	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7	Facility Security and Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8	Funds and Personal Property	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9	Hold Rooms in Detention Facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10	Key and Lock Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11	Population Counts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12	Post Orders	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13	Searches of Detainees	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14	Sexual Abuse and Assault Prevention and Intervention	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15	Special Management Units	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16	Staff-Detainee Communication	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17	Tool Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18	Use of Force and Restraints	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>PART 3 ORDER</b>					
19	Disciplinary System	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>PART 4 CARE</b>					
20	Food Service	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
21	Hunger Strikes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
22	Medical Care	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
23	Personal Hygiene	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
24	Suicide Prevention and Intervention	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25	Terminal Illness, Advance Directives, and Death	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>PART 5 ACTIVITIES</b>					
26	Correspondence and Other Mail	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
27	Escorted Trips for Non-Medical Emergencies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
28	Marriage Requests	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
29	Recreation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
30	Religious Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
31	Telephone Access	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
32	Visitation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
33	Voluntary Work Program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>PART 6 JUSTICE</b>					
34	Detainee Handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
35	Grievance System	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
36	Law Libraries and Legal Material	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
37	Legal Rights Group Presentations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>PART 7 ADMINISTRATION &amp; MANAGEMENT</b>					
38	Detention Files	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
39	News Media Interviews and Tours	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
40	Staff Training	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
41	Transfer of Detainees	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## LCI Review Assurance Statement

By signing below, the Lead Compliance Inspector (LCI) certifies that all findings of noncompliance with policy or inadequate controls contained in the Inspection Report are supported by evidence that is sufficient and reliable. Furthermore, findings of noteworthy accomplishments are supported by sufficient and reliable evidence. Within the scope of the review, the facility is operating in accordance with applicable law and policy, and property and resources are efficiently used and adequately safeguarded, except for the deficiencies noted in the report.

Lead Compliance Inspector: (Print Name) [REDACTED]	Signature [REDACTED]
Title & Duty Location Lead Compliance Inspector, The Nakamoto Group, Inc.	Date 1/17/2019

### Team Members

Print Name, Title, & Duty Location [REDACTED], Security SME, The Nakamoto Group, Inc.	Print Name, Title, & Duty Location [REDACTED], Medical SME, The Nakamoto Group, Inc.
Print Name, Title, & Duty Location [REDACTED], Safety SME, The Nakamoto Group, Inc.	Print Name, Title, & Duty Location [REDACTED], Medical SME, The Nakamoto Group, Inc.

### Recommended Rating:

☒ Meets Standards  
☐ Does Not Meet Standards

Comments: This inspection was conducted to determine overall compliance with the ICE Performance Based National Detention Standards (PBNDS 2011) which include the following additions/changes to the standards listed on page three:

- Medical Care (Women), a new standard, was rated Meets Standards;
- Classification System is now titled Custody Classification System;
- Suicide Prevention and Intervention is now titled Significant Self-Harm and Suicide Prevention and Intervention;
- Escorted Trips for Non-Medical Emergencies is now titled Trips for Non-Medical Emergencies;
- News Media Interviews and Tours is now titled Interviews and Tours, and;
- Transfer of Detainees is now titled Detainee Transfer.

There were nine allegations of sexual abuse/assault since the last inspection; of which one was unfounded, one was substantiated, six were unsubstantiated and one was referred to ICE. The allegation referred to ICE was a female detainee who alleged that while she was being transported to this facility, she was sexually assaulted by an ICE agent. One allegation that was substantiated involved a detainee touching the buttocks area of another detainee. One other detainee, who was placed in an observation room because he was under the influence of drugs and alcohol, claimed that he was sexually assaulted while in the observation room. The claim was unfounded. Six other allegations were claims of detainee-on-detainee sexual abuse/assault. The allegations ranged from inappropriate touching to harassment incidents which were found to be unsubstantiated. Case files were reviewed. Procedures conducted by medical and detention staff were found to comply with the requirements of the standard.

There were two suicide attempts during this inspection period. On 7/31/2018, a 32-year-old detainee was observed by a detention officer lying on the shower floor with self-inflicted superficial lacerations on his upper and lower extremities. Medical staff responded and the detainee was taken to the emergency room of El Centro Regional Medical Center. He was discharged from the hospital on the same day and continued on suicide watch. He stated that people in his country would hurt him if he were sent back and would rather die here. He was released to general population on 8/7/2018. On 10/20/2018, a 39-year-old male detainee wrapped a phone cord around his neck while he was using the phone in the observation room. The detention officer was able to take the phone away from him; a medical referral was made. Medical staff referred the detainee to the emergency room for evaluation and treatment. He was sent back on the same day and was placed on suicide watch. On 11/1/2018, when he was being escorted to the shower room, he grabbed the phone extension cord that was being used by another detainee and attempted to wrap it around his neck. The officer was

able to restrain him. The detainee was referred to medical. He was taken to the emergency room but was returned to the facility after evaluation. He continued on suicide watch until a bed was available at the Alvarado Parkway Institute. The detainee was then transferred from the hospital to another facility. Actions taken complied with the requirements of the standard.

There was one hunger strike incident during this inspection period. A forty-year-old male was placed on hunger strike monitoring for eleven days. He went on hunger strike because his immigration status was not being addressed expeditiously. Procedures conducted by medical and detention staff comply with the requirements of the standard.

During the past inspection period there were thirteen incidents in which officers used force to control a detainee. All thirteen incidents involved immediate uses of force. There were no calculated uses of force. Four incidents involved detainees assaulting officers, three incidents involved detainees acting in an aggressive manner, three incidents involved detainees refusing to comply with staff orders, one incident involved a detainee resisting during an escort to the RHU and one incident involved a detainee on detainee fight where the aggressor detainee refused staff orders to stop the assault. In all of the mentioned incidents staff used physical force and holds to control and place the detainees in restraints. There were no detainee injuries. The final incident involved a detainee attempting self-harm. This incident was classified as an attempted suicide. Staff intervened and used physical force and holds to restrain and control the detainee. The detainee suffered no injuries. OC was not used in any of the incidents. All thirteen incident reports were reviewed and were found to fully document the incidents. Medical attention was prompt. With one exception, the force used in each incident was appropriate for the circumstances faced by the officers. In one incident, the after-action review committee felt the force used by the officer was not necessary and appropriate administrative action was taken. Each incident was reviewed by the after-action review committee in a timely manner. In each case the reviews conducted by the after-action review committee were found to be in-depth and identified a range of issues requiring follow-up; training was conducted. A review of the use of force incidents found that the amount of force used by staff, in all incidents, was justified and appropriate. All after-action review reports are forwarded to the FOD.

There were no escapes or deaths during the inspection period. The only chemical agent authorized for use is OC (oleoresin capsicum)/pepper spray. The disturbance control team members and transportation staff have been trained in the application of OC/pepper spray. The use of unsafe types of force such as choke holds, carotid control holds and neck restraints are prohibited by policy. The use of Tasers is prohibited.