



December 20, 2018

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Montgomery Processing Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2011) of the Montgomery Processing Center in Conroe, TX, during the period of December 18-20, 2018. This is a CDF 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]
Medical Care	[REDACTED]
Safety	[REDACTED]

Type of Inspection

This is a scheduled annual/90 day follow-up inspection which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72 hour facilities.

Inspection Summary

The Montgomery Processing Center is currently accredited by:

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

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 pre-occupancy and the 90 day follow-up compliance inspections:



The Nakamoto Group, Inc.

2018 Pre-Occupancy Inspection	
Meets Standard	41
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	1

2018 Annual/90 Day Follow-Up Inspection	
Meets Standard	41
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	1

The inspection team identified eight (8) deficient components in the following five (5) standards:

Environment Health and Safety—2, both of which are repeat deficiencies
Admission and Release—1
Staff-Detainee Communication—1
Medical Care—2, one of which is a Priority and a repeat deficiency
Detainee Transfer—2

Facility Snapshot/Description

The Montgomery Processing Center, a contract detention facility (CDF), is located on Hilbig Road in an industrial section of northeast Conroe, TX. In addition to the Montgomery Processing Center, Hilbig Road is the home of several law enforcement/corrections entities in Conroe including the Texas Department of Public Safety, the Montgomery County Sheriff's Office and county jail, the Joe Corley Detention Facility and the Montgomery County Mental Health Facility. The GEO Group, Inc. owns the Montgomery Processing Center and operates it pursuant to a contract with ICE. [REDACTED]

The facility is a single two-story building with the secure perimeter surrounded by an outer twelve-foot J-bar chain link fence and an inner eight-foot chain link fence which is supplemented by razor ribbon at the top and bottom. The entire perimeter is under camera surveillance and is continuously monitored by central control officers. There is a paved road that encircles the entire compound which is patrolled 24 hours a day by armed officers. All exterior door egress is controlled by central control officers. The facility has 527 surveillance cameras. The housing units and all support departments are accessible off one long main corridor. All detainee movement outside of the housing units is escorted.

The facility has both dormitory and cell design housing. There are seventeen general population housing units ranging in capacities from 40-64 beds and two special management units; one for males and one for females. The restricted housing unit (RHU) for males contains 46 cells, each with two beds. The RHU for females consists of four cells each with two beds. [REDACTED]

[REDACTED] All housing units are under 24 hour direct supervision of at least one officer. General population housing units have an adjacent outdoor recreation area to which detainees have continuous access during daylight hours. There are three large soccer fields/yards which are available to all general population housing units on a rotating schedule.

The housing units each have a dayroom area equipped with two televisions, telephones, various table-top board games and two microwave ovens. Most general population housing units have two computers equipped with LexisNexis to which detainees have free access during waking hours. Additionally, electronic tablets were placed in each general population housing unit the week prior to the inspection. The tablets will eventually allow detainees, for a fee, to watch movies, play games, text with family or friends and have video visits. For no charge, detainees will be able to submit requests to facility and ICE staff, place commissary orders and review

both the local site-specific handbook and the ICE National Detainee Handbook. The entire facility is climate controlled. Sanitation throughout the facility was observed to be above average.

All housing units and common areas of the facility which are used by ICE detainees were visited and/or observed during the inspection. Numerous detainees were interviewed; some interviews were with small groups of detainees and several were private and confidential and included detainees with limited English proficiency (LEP). Language line was used to interview several detainees who spoke neither English nor Spanish. Interviews included detainees who had recently arrived at the facility and some who had been housed at the facility since it opened. The detainees voiced no concerns regarding life/safety issues. Detainees were generally satisfied with the interaction, responsiveness and professionalism of facility and ICE staff and with access to medical services, the law library, telephones, visitation and recreation. Detainees expressed no concerns regarding either the quality or quantity of food served at the facility.

One detainee complained that the computers equipped with LexisNexis in his housing unit were not working. At the request of the Lead Compliance Inspector (LCI), these computers were checked by the facility's information technology officer and were found to be in good working order. There were several detainees who voiced specific concerns regarding medical issues. The Medical SME followed-up on each of these concerns and found that the detainees had been seen by medical staff regarding the medical issues and concerns they expressed.

Detainee telephone services are provided by Talton Communications, Inc., via a contract with ICE. Medical services are provided by IHSC; detainees do not incur medical co-pays. All other services are provided by the Geo Group, Inc.

Areas of Concern/Significant Observations

Priority Component Rated Does Not Meet Standards

Medical Care

Component #47 (Repeat Finding): Each facility shall have a written emergency services plan for the delivery of 24-hour emergency health care.

A plan shall be prepared in consultation with the facility's clinical medical authority or the HSA. The plan will include the following:

- An on-call physician, dentist, and mental health professional, or designee, that are available 24 hours per day;
- A list of telephone numbers for local ambulances and hospital services available to all staff;
- An automatic external defibrillator (AED) will be maintained for use at each facility and accessible to staff;
- All detention and medical staff shall receive cardio pulmonary resuscitation (CPR, AED), and emergency first aid training annually;
- Security procedures that ensure the immediate transfer of detainees for emergency medical care.

Finding: The HSA provided a draft plan for the delivery of 24-hour emergency care which includes the elements listed in the component and required by the Standard; the plan is pending approval by IHSC officials.

Recommendation: A 24-hour emergency care plan which includes all of the elements required by the Standard should be approved and implemented.

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. No (0) standards were found Does Not Meet Standard and one (1) standard was Not Applicable (N/A). All remaining forty-one (41) 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 – [REDACTED]
- Facility Staff [REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector

Printed Name of LCI

December 20, 2018

Date