

January 6, 2021

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Inspection of the Houston Contract Detention Facility**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 Houston Contract Detention Facility in Houston, Texas during the period of January 4 - 6, 2021. This is a CDF.

The annual 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 inspection which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72-hour facilities. The facility received a rating of Meets Standards during the January 2020 annual inspection.

Inspection Summary

The Houston Contract Detention Facility 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) - 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 2020 and 2021 PBNDS annual inspections:



The Nakamoto Group, Inc.

| 2020 Annual Inspection | |
|-------------------------------|----|
| Meets Standards | 41 |
| Does Not Meet Standards | 0 |
| Repeat Finding | 0 |
| Not Applicable | 1 |

| 2021 Annual Inspection | |
|-------------------------------|----|
| Meets Standards | 41 |
| Does Not Meet Standards | 0 |
| Repeat Finding | 0 |
| Not Applicable | 2 |

The inspection team identified zero (0) deficient components.

Facility Snapshot/Description

The Houston Contract Detention Facility is owned and operated by CoreCivic (private detention management company). The facility is located fifteen miles north of downtown Houston off Interstate 69.

[REDACTED]

The facility was built in 1984. It is a stand-alone multi-storied facility that is surrounded by one twelve-foot high chain link fence supplemented with razor ribbon on top; the fence line is built into an eighteen-inch buried rat wall extension that runs between the fence post pilings. The perimeter fence is equipped with a movement detection system that sounds alarms on contact; it is tested daily. There is a path around the entire perimeter that is intermittently foot patrolled by an unarmed officer. Surveillance cameras offer visibility around the entire perimeter, into the housing units, the common areas, and interior movement corridors. All exterior building doors are under constant camera surveillance and are controlled by central control staff. The facility is equipped with a 257 surveillance camera network that is monitored 24 hours a day.

There are 26 individual general population housing units which are all dormitory design ranging in size from twenty to sixty beds. There are two special management units (SMU) for housing administrative and disciplinary segregation status detainees for a total of 36 one-bed cells; 32 cells for males and four cells for females. Two of the SMU cells can also be used for medical observation status. There were no detainees housed in the SMU during the inspection. The facility has dedicated portions of its housing units to serve as COVID-19 wings; they were empty during the inspection. The medical unit has sixteen beds; four are located in a negative air flow environment, four are dedicated to respiratory isolation, and eight are for housing short-stay admissions.

Each general population living area has a common dayroom which is equipped with a television, fixed table/chair units for detainees to eat their meals, play games, and gather for conversation. There are two kiosks in each housing unit on which detainees can place their weekly commissary orders. There are electronic tablets in each housing unit, currently available at a ratio of one for ten detainees, on which detainees can receive and send emails, conduct video-visits, make telephone calls, check their account balance, send requests directly to designated facility and ICE/ERO staff, file grievances, view the LexisNexis collection, and access fee-based entertainment programs. The facility handbook and all announcements, schedules, and information bulletins are posted on the tablets. Detainees are provided daily indoor and outdoor recreation. The indoor recreation areas, for both males and females, are equipped with stationary exercise bicycles and basketball courts.

Inspectors interviewed eighteen general population detainees; five of the interviews required an interpreter. Overall detainees were satisfied with the food, their medical treatment, recreational opportunities, the cleanliness of the facility, law library access, unfettered mail, commissary privileges, and law library services. One detainee stated he did not receive a facility handbook during in-processing. The safety SME



The Nakamoto Group, Inc.

discussed this allegation with the classification coordinator who is responsible for reception and discharge services. A review of the detainee's detention file revealed a signed acknowledgement for receipt of a facility handbook. Despite the discovery, the detainee was provided another handbook.

There were general comments about the detainees not being able to see their ICE/ERO officer in the housing unit. This situation was discussed by the LCI/Detainee Rights SME with the COR/deportation officer assigned to the facility. Current edicts issued by ICE/ERO headquarters prohibits staff from entering the housing units due to COVID-19 conditions. Communication is currently carried on through tablet communications which detainees stated they liked the availability and reliability of the service. On-site ICE/ERO staff received and responded to 7,734 detainee requests during this inspection period.

Most of the detainees were concerned about COVID-19 conditions and their overall health, but understood the practices put in place were for everyone's protection and safety. The safety protocols in place adhere to public health guidelines and ICE/ERO mandates.

In contrast to the detainees favorable comments about their treatment and respect they receive from staff and the fact they stated they felt safe at the facility, there were 58 grievances filed during the inspection period alleging staff misconduct. This represents seventy percent of all grievances filed. This aberration, to what inspectors heard, was discussed with the warden by the LCI/Detainee Rights SME. Almost all of the complaints revolved around the officers' control of the dayroom television remote control. This practice is their policy. When the detainees' demands for control were unmet, their subsequent action was to file a grievance. Per the warden and command staff comments, the bulk of these grievances came from an orchestrated effort by a handful of detainees. Over the last three months those detainees have transferred out of the facility and these types of grievances have subsided. Since most of these situations originated in the housing unit dayrooms, the warden and other select command staff reviewed camera coverage of the alleged incidents. No substance was established for staff misconduct on any of the allegations; it was simply detainees not getting what they wanted which was control of the television remote control. Detainees who filed a grievance, and were unaware of the OIG, were informed of its function and how to contact the resource.

An assessment of the general cleanliness of the facility could not be determined due to the remote nature of the inspection.

Medical services are provided by ICE Health Service Corp. Food service is managed by Trinity Services Group. Maintenance operations are provided by CoreCivic employees. Detainee telephone and tablet services are provided by Talton Communications. ICE detainees are not charged medical co-pays.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations noted during the inspection. The inspection was conducted remotely and inspectors were unable to personally observe practices and procedures within the facility. The inspection team relied upon photographs and/or videos to validate the observation of many standards.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards unless unobserved practices and conditions are contrary to what was reported to the inspection team. The facility complies with the ICE Performance-Based National Detention Standards (PBNDS) 2011 for Over 72-hour facilities. No (0) Standards were rated as Does Not Meet Standard and two (2) standards were Not Applicable (N/A). All remaining forty-one (41) standards were found to Meet Standards.

LCI Assurance Statement

The findings of compliance and noncompliance are accurately and completely documented on the G-324A Inspection Form and are supported by documentation in the inspection file. A call-in 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

January 6, 2021

Printed Name of LCI

Date