

November 11, 2020

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Morgan County Adult Detention Center**

The Nakamoto Group, Inc. performed a remote annual inspection for compliance with the ICE National Detention Standards (NDS 2019) of the Morgan County Adult Detention Center in Versailles, Missouri, during the period of November 9-11, 2020. 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]
Medical Care	[REDACTED]
Safety	[REDACTED]

Type of Inspection

This is a scheduled remote annual inspection, which is performed to determine overall compliance with the ICE NDS 2019 for Over 72 hour facilities. The facility received a rating of Meets Standards during the February 2019 inspection (NDS 2000).

Inspection Summary

The Morgan County Adult Detention 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 2019 and 2020 annual inspections:



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2019 Annual Inspection	
Meets Standards	37
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

2020 Annual Inspection	
Meets Standards	30
Does Not Meet Standards	1
Repeat Finding	0
Not Applicable	2

The inspection team identified thirty-two (32) deficient components in the following fifteen (15) standards:

- Environmental Health and Safety – 2
- Detainee Funds and Personal Property – 3
- Searches of Detainees – 1
- Special Management Units – 1
- Food Service – 4
- Hunger Strikes – 1
- Medical Care – 4
- Suicide Prevention and Intervention – 5
- Terminal Illness, Advance Directives and Death – 1
- Disability Identification, Assessment, and Accommodation – 4
- Correspondence and Other Mail – 1
- Recreation – 1
- Telephone Access – 2
- Detainee Handbook – 1
- Detainee Transfers – 1

Facility Snapshot/Description

As confirmed by the operations sergeant, the Morgan County Adult Detention Center is owned and operated by Morgan County under the supervision of the Sheriff. The facility is located in the city of Versailles, Missouri, which is approximately three hours southeast of Kansas City, Missouri. The facility houses adult male and female detainees for ICE, U.S. Marshals Service, City of Versailles and Morgan County. [REDACTED]

[REDACTED] The facility houses ICE detainees of all classification levels.

The facility is described as a podular remote design consisting of housing units furnished with triple bunked cells and dormitory-style pods. ICE detainees are commingled with detainees from other jurisdictions with compatible classification levels. The control tower is centrally located and provides indirect supervision, as well as, camera surveillance. Photo images confirmed that each dayroom is equipped with televisions, telephones, a video visitation kiosk, and stainless-steel tables and stools. According to the sergeant and confirmed by photo images each cell is equipped with a table and stool.

Sixteen ICE detainees were interviewed. One detainee was interviewed regarding grievances he had filed. The detainee indicated that grievances “are not answered timely, and that he had not received a response from two grievances that he had filed”. A review of his detention file revealed that the administration had responded. The detainee was advised. He stated that “they hold the grievances until you complain a lot” and then will show a date to meet the requirements of their policy. A review of grievances in his deten-



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tion file did not support his claims. Follow up confirmed that grievances submitted on 2/19/2020 were answered on 2/22/2020; submitted 4/22/2020, answered 4/23/2020; submitted 5/18/2020, answered 5/21/2020; and submitted 7/4/2020, answered 7/7/2020. The detainee filed an appeal on one grievance regarding his diet. He wanted to have eggs as a source of protein on his vegetarian diet and was denied. He appealed the decision, and that appeal was denied. He voluntarily changed from a vegetarian diet to a regular diet because he was getting too many meals with beans which was a main protein entrée on the vegetarian diet. Other grievances concerned bulk shampoo where he and a group of detainees stated that shampoo was not available to them. The facility had changed from bulk to individual shampoo containers and they all received individual bottles. He also filed a grievance complaining of back pain. He was seen by the doctor and was told to take a hot shower and was offered some pain medication.

Another detainee expressed concerns about COVID-19 and how the staff was handling the virus. He did not identify any specific concerns other than expressing concern about the medical treatment and exposure and the possibility of someone dying. His name was forwarded to the HSA to provide follow up education regarding COVID-19.

Two non-English speaking detainees were interviewed. One detainee said they did not use a translator at intake but indicated that he did see the medical providers. He also stated that he did not receive a handbook and was told that the handbook is on the kiosk in his unit and he could also ask the staff for one. Both indicated they were adjusting well and felt safe at the facility and simply wanted to be released. Detention files receipts confirmed that both detainees had received a handbook. The balance of detainees interviewed expressed no substantive complaints.

All detainees interviewed stated that they felt safe at the facility. No detainee had used the OIG hotline.

Food services are provided by a contract with Trinity. Medical care is provided by Advanced Corrections Healthcare, Inc. (ACH). ICE detainees do not incur medical copayments.

Areas of Concern/Significant Observations

One Standard was rated Does Not Meet during this remote inspection. Photo and video images were used to facilitate observations during the inspection.

Suicide Prevention and Intervention

Policy:

This standard protects the health and well-being of ICE detainees through a comprehensive suicide prevention and intervention program that minimizes risk.

Findings:

The suicide prevention and intervention course is online education. A review of topics covered was not available to confirm inclusion of the requirements.

Detainees identified as at-risk for suicide or self-harm are immediately referred to a mental health provider. However, the evaluation may not take place for several days as the mental health provider is only onsite one day per week.

Review of health records of detainees on suicide watch did not confirm a mental health provider documents the suicide risk assessment requirements.



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Health care personnel are absent from the facility twelve hours per day five days per week and eighteen hour each day on the weekends. Welfare checks are not performed per the standard. Review of health records confirmed multiple times when checks were not documented for over an hour.

Recommendation:

Ensure staffing plan includes availability of staff for completing “watches” within standard guidelines. Ensure that required wellness checks are completed. Ensure that health record documentation is completed within standard guidelines.

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 National Detention Standards (NDS 2019) for Over 72 hour facilities. One (1) standard was found Does Not Meet and two (2) standards were Not Applicable (N/A). All remaining thirty (30) standards were found to Meet Standards.

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 remotely, with the entire Nakamoto Group, Inc. Inspection Team participating in the Conference Call, as well as, the following:

- ICE Officials – [REDACTED]

- Facility Staff – [REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector

November 11, 2020

Printed Name of LCI

Date