

October 1, 2020

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Inspection of the Okmulgee County Jail -Moore Detention Facility**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 of the Okmulgee County Jail - Moore Detention Facility in Okmulgee, Oklahoma, during the period of September 29, 2020 - October 1, 2020. This inspection was conducted remotely due to the COVID-19 virus. This is an IGSA facility.

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 September 2019 annual inspection.

Inspection Summary

The Okmulgee County Jail-Moore Detention Facility is currently accredited by:

- The American Correctional Association (ACA) - Yes
- 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 PBNDS 2011 compliance annual inspections:

2019 Annual Inspection	
Meets Standards	40
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

2020 Annual Inspection	
Meets Standards	40
Does Not Meet Standards	0
Repeat Findings	0
Not Applicable	2

The inspection team identified six (6) deficient components in the following four (4) standards:

Sexual Abuse and Assault Prevention and Intervention - 1
Food Service - 1
Medical Care - 2
Detainee Transfers - 2

Facility Snapshot/Description

The Okmulgee County Jail - Moore Detention Facility in Okmulgee, Oklahoma is owned by Okmulgee County and operated under the jurisdiction of the Okmulgee County Criminal Justice Authority. The facility is an IGSA located approximately 40 miles south of Tulsa, Oklahoma. The facility has a [REDACTED] housing all custody levels of adult male ICE detainees and male U.S. Marshals Service detainees.

[REDACTED]

There are currently three housing units used to house ICE detainees; two of which are dormitories that house low to medium low custody detainees and one celled housing unit that houses medium high to high custody detainees. A review of detainee rosters verified that there is no commingling with other detainees with dissimilar custody levels. There is a dedicated special management unit containing ten cells with two-person occupancy. The facility is a two-story building operated under the indirect supervision model. Living units appear well lit with both natural and artificial light and have adequate open space for detainees. A housing unit floor plan, photographs, and video recordings of the housing units were provided for review. The living areas are furnished with tables and chairs for detainees to participate in leisure time activities and socializing. The compliance manager reported that board games, leisure reading material, playing cards, and televisions are among the amenities available to detainees. Staff reported that detainees have access to a desktop computer for legal research and computer tablets in each of the ICE housing units for reviewing the detainee handbook, checking account balances, and submitting electronic requests to ICE. The SDDO confirmed that electronic detainee requests were added to the computer tablets at the beginning of September 2020. Detainees reported that they have daily access to the outdoor recreation yard to jog, walk, and play soccer with other detainees housed in their living unit. General visitation and group religious services have been temporarily suspended due to health concerns associated with the COVID-19 virus. Video visitation is available to detainees and the facility chaplain conducts smaller group services in each of the housing units.

The facility is reported to be climate controlled and appeared to be in good repair based on photographs and videos reviewed by inspectors. Administrative and supervisory staff interviewed were well-versed in facility guidelines and operating procedures as well as the National Detention Standards. At the request of the facility, officers did not participate in formal interviews with SMEs. Staff were professional during interviews and detainees spoke willingly and respectfully. A review of photographs, videos, sanitation inspection reports, and interviews with staff and detainees concluded that the sanitation level of the facility was average.



The Nakamoto Group, Inc.

The inspection team interviewed twenty LEP and English-speaking detainees. Interviews were held telephonically and with the assistance of an interpreter when needed. There were no substantive concerns voiced when asked about their personal safety, treatment by staff, or law library services. The quality and quantity of food being served was reported by detainees as being plentiful and tasty. Some complained of not receiving enough fresh fruit. Two LEP detainees expressed concern for not being able to complete international calls to their family explaining that the telephone provider has not authorized the area code for the country that they are calling. The lead case manager confirmed that a work order was forwarded to the telephone provider last week to resolve this issue. Both detainees stated that they did not submit their concerns to the OIG because they are willing to give facility staff a chance to resolve the problem. A number of detainees complained of the lack of cleanliness of showers and restroom facilities, adding that cleaning supplies are limited and seldom offered to the detainees for use. Prior to staff receiving knowledge of this complaint, a video of the three housing units, kitchen, medical services, and the special management unit was requested and provided for review. The video showed that while showers and restrooms could benefit from more detailed cleaning, fixtures, walls and floors were free from mold and/or mildew and did not show the deplorable conditions described by the detainees in the interview. A review of sanitation inspection reports over the inspection period verified that consistent inspections were being completed and the results documented. A review of housing unit logs over the inspection period verified that cleaning supplies are brought into the housing unit daily. Close proximity of sleeping arrangements was also brought up during detainee interviews. Finally, on the first day of the inspection, a single detainee housed in SMU was interviewed by the security SME. This detainee has been in administrative segregation status for over sixty days. He reported daily access to medical, recreation, and law library services but stated that he does not like the exercise area and the legal reference material is inadequate for his needs so he seldom uses either service. The detainee reported that he has made numerous reports to OIG but has not received any response. When the SME ask for more specifics regarding his complaint, the detainee declined to comment further. This information was provided to facility staff to follow up as necessary.

Food services, medical services, and the facility medical doctor are Okmulgee County employees while dental and mental health services are contracted with a local provider. The facility does not charge co-pays for medical, mental health, or dental care.

Detainee telephone services are provided by Encartele via contract with the facility.

Areas of Concern/Significant Observations

There are no areas of concerns or significant observations.

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. No (0) standard was found as Does Not Meets and two (2) standards were Not Applicable (N/A). All remaining forty (40) 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-324A Inspection Form and are supported by documentation in the inspection file. An out brief was conducted telephonically with facility staff and ICE representatives. 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	October 1, 2020
Printed Name of LCI	Date