

August 29, 2019

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Howard County Jail**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 of the Howard County Jail in Jessup, MD during the period of August 27-29, 2019. 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
Security	[REDACTED]
Detainee Rights	[REDACTED]
Medical Care	[REDACTED]
Safety	[REDACTED]
Medical Care	[REDACTED]

Type of Inspection

This is a scheduled annual/180-day re-inspection, which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72 hour facilities. The facility received a previous rating of Does Not Meets Standards during the November 2018 inspection.

Inspection Summary

The Howard County Jail 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) – Yes

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 annual PBNDS 2011 compliance inspection and 2019 annual/180-day PBNDS 2011 compliance re-inspection:

2018 Inspection		2019 180-Day Re-Inspection	
Meets Standards	38	Meets Standards	38
Does Not Meet Standards	0	Does Not Meet Standards	0
Repeat Finding	0	Repeat Finding	0
Not Applicable	4	Not Applicable	4

The inspection team found eleven (11) component deficiencies in the following three (3) standards:

Environmental Health and Safety- 1

Post Orders- 1

Food Service- 9, two of which are repeat deficiencies

Facility Snapshot/Description

The Howard County Detention Center is a [REDACTED] indirect supervision facility located in the northern part of Jessup, MD. The facility is operated by Howard County and managed by the Director of Corrections. The facility houses adult male and female detainees for Howard County and local surrounding counties, the U.S. Marshals Service, and adult male ICE detainees. [REDACTED]

The two-story structure has twelve general population housing units and housing units designated for administrative segregation, disciplinary segregation, and special confinement. Roving corrections officers and cameras provide supervision.

Each housing unit has a dayroom area with tables, chairs, a television, telephones and a sufficient number of showers and wash basins. Dayroom activities include card games, board games, and television. Outdoor recreation is offered daily for one hour, weather permitting. Sanitation throughout the facility was acceptable. The detainee shower and toilet facilities were especially clean, compared to previous inspections.

Detainees spend the majority of their time socializing in the dayrooms. They have access to commissary and visits, as well as, most facility information via kiosks in the housing units. While a number of detainee interviews were conducted, only one detainee approached the inspection team during the inspection to initiate conversation. This leaves the impression that, overall, detainee issues are being addressed. Due to the nature of indirect supervision, facility staff were not noticeably engaged with detainees, as in direct supervision facilities. ICE officers were very familiar with the detainees and their individual issues.

The facility is undergoing renovation of their kitchen. As a result, food is being prepared at a neighboring facility and trucked in to be served to detainees. The neighboring facility's food preparation was inspected by the Safety SME to ensure compliance with the Food Service Standard. The suicide watch cells are also being renovated and cannot be used at present. Detainees requiring suicide watch are sent to yet another neighboring facility and placed in the safe cell under observation. The Medical SME inspected the safe cell at the neighboring facility to ensure compliance with the Standards.

The inspection team conducted no less than 41 interviews, including 25 formal interviews. One detainee pointed out a telephone that was broken, although the inspector had already made note of it. The telephone provider repair technician was notified. Telephone repair generally occurs within one or two work-



The Nakamoto Group, Inc.

ing days from the time of report. A number of detainees complained about the meal service, due largely to the food service area being renovated and the lack of hot meals and meal variety. The Director assured the inspection team that the food service renovations will be complete by October 2019. Several detainees stated that their commissary is taken at the ICE sub office during the transfer process from one facility to another; and that their telephone cards from other facilities do not work at this facility; yet no system is in place for them to get their money refunded. The inspection team made the ICE staff aware of these complaints and urged them to seek solutions to any practice that resulted in unnecessary financial loss to detainees, due to no fault of their own. Five detainees stated that they were not issued their individual sporks and cups, as were the other detainees in their housing unit. The facility corrected this oversight immediately. One detainee stated that the printer in the low security law library was broken. The facility replaced the printer during the inspection. Four detainees complained that they were not given the required amounts of clothing and bedding. The Medical SME checked the issuance for each of them and it was determined that two of the detainees had in fact signed for the appropriate amount of clothing and bedding. It could not be determined if the other two had received the items, so the facility staff immediately issued them. A detainee stated that there were some officers that were not responsive to his requests, but could furnish no names or identifying information for investigation. A detainee stated that the milk was outdated. The Safety SME checked the milk supply and determined that none of the milk was beyond expiration dates. Detainees expressed no concerns about their safety, even when asked in confidential settings. Interviews with LEP detainees affirmed that they are able to access needed services.

There are no medical co-payments for ICE detainees. Health services are provided through a contract with Wellpath. All other services are provided by Howard County employees.

Areas of Concern/Significant Observations

The facility has instituted the plans and changes as they committed to during the April 2019 Technical Assessment Review.

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 as Does Not Meet and four (4) standards were Not Applicable (N/A). All remaining thirty-eight (38) standards were found to be in compliance.

LCI Assurance Statement

The findings of Meets Standards and Does Not Meet Standards 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 at the facility and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials – [REDACTED]
- Facility Staff – [REDACTED], and various other staff and supervisors

[REDACTED]

[REDACTED], Lead Compliance Inspector
Printed Name of LCI

August 29, 2019
Date