

March 12, 2020

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Pulaski County Detention Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 of the Pulaski County Detention Center in Ullin, Illinois during the period of March 10-12, 2020. 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
Safety	[REDACTED]
Security	[REDACTED]
Medical Care	[REDACTED]
Detainee Rights	[REDACTED]
Medical Care	[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 previous rating of Meets Standard during the March 2019 annual inspection.

Inspection Summary

The Pulaski County Detention Center is currently accredited by:

- The American Correctional Association (ACA) - No
- The National Commission on Correctional Health Care (NCCHC) – Yes
- 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 2019 and 2020 PBNDS 2011 annual compliance inspections.

2019 Annual Inspection	
Meets Standards	41
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	1

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

The inspection team found four (4) component deficiencies in the following four (4) standards:

Funds and Personal Property – 1, which is a repeat deficiency

Use of Force and Restraints – 1

Significant Self-Harm and Suicide Prevention and Intervention – 1

Correspondence and Other Mail – 1, which is a repeat deficiency

Facility Snapshot/Description

The Pulaski County Detention Center is operated under the jurisdiction of the Pulaski County Sheriff's Department. The facility is located on the southern tip of Illinois approximately thirty miles north of Paducah, Kentucky. [REDACTED] The facility houses adult male and female ICE detainees of all classification levels, and adult male and female Pulaski and Alexander County inmates. [REDACTED]

The facility is a single structure building built in 1997. There are eight separate general population housing units, of which six are dedicated to ICE detainees; five for males and one for females. General population housing units are either a dormitory setting ranging from 50-56 beds or a cell block consisting of twelve two-bed cells. There is one male special management unit consisting of eight two-bed cells; it is used for all populations. Female detainees are sheltered in place inside their assigned housing unit. There were three ICE detainees in segregation status during the inspection. All housing units are governed by an indirect supervision model of management. The health care unit does not contain an infirmary unit.

The exterior perimeter of the compound is a combination of the exterior walls of the building and segments of chain-link fencing, which are supplemented with razor ribbon. The facility's perimeter road is patrolled by an unarmed officer in a vehicle when detainees are using the outdoor recreation yard, and/or at least once each shift. The entire perimeter, all housing units and movement corridors are monitored by central control officers controlling a 58-surveillance camera network. All exterior doors of the building are alarmed and under camera surveillance; their access is governed by central control personnel.

Each housing unit is designed with a dayroom area consisting of four televisions; fixed table/stool seating units, on which detainees eat their meals, play board and/or card games or simply converse; a bank of mounted telephones; a microwave; and two mounted video-visit stations.

The facility offers indoor and outdoor recreation. General population ICE detainees receive at least four hours of outdoor recreation daily; SMU detainees in administrative segregation status receive at least two hours of outdoor recreation daily plus one hour of extra out-of-cell time daily; SMU detainees in disciplinary segregation status receive at least one hour of outdoor recreation daily. All outdoor recreation is offered as weather permits. There is one indoor gymnasium; it is available to all detainees on a weekly schedule.



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Detainees spoke freely with the inspectors. Interaction between detainees and facility and ICE/ERO staff was observed to be courteous and businesslike. The atmosphere throughout the facility was quiet and orderly. Facility staff were professional in appearance and seemed knowledgeable of the daily schedule and emergency response protocols.

Approximately forty general population LEP and English-speaking ICE detainees, plus all of the detainees in segregation status, were interviewed in open and confidential settings. Many of the interviews were aided by use of a language line interpreter. The detainees voiced no concerns regarding life/safety issues. Detainees were satisfied with the interaction from facility staff and the treatment they receive from the officers. There were no issues regarding conditions of confinement, access to or responsiveness from on-site ICE/ERO personnel, medical services, quality of food, cleanliness or access to programs or activities.

Pulaski County employees provide medical, food service and maintenance service. ICE detainees do not incur medical co-payments. The facility maintains an average level of cleanliness and sanitation.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations.

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. Forty-one (41) standards were found to Meet Standards. One standard was found Not Applicable.

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. 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]

[REDACTED], Lead Compliance Inspector

March 12, 2020

Printed Name of LCI

Date