

November 25, 2020

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Inspection of the Jerome Combs Detention Center**

The Nakamoto Group, Inc. performed a remote annual inspection for compliance with the ICE National Detention Standards (NDS) of the Jerome Combs Detention Center in Kankakee, Illinois, during the period of November 23-25, 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
Detainee Rights	[REDACTED]
Medical Care	[REDACTED]
Security	[REDACTED]
Safety	[REDACTED]
Medical Care	[REDACTED]

Type of Inspection

This is an annual inspection which is performed to determine overall compliance with the ICE NDS for Over 72 hour facilities. The April 2019 inspection was rated Meets Standards.

Inspection Summary

The Jerome Combs 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) – 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 NDS compliance inspections:

2018 Annual Inspection	
Meets Standard	38
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	1

2019 Annual Inspection	
Meets Standard	38
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	1

The inspection team identified six (6) deficient components in the following five (5) standards:

- Access to Legal Materials - 1
- Correspondence and Other Mail - 2, both of which are repeat deficiencies
- Environmental Health and Safety - 1
- Staff/Detainee Communications - 1
- Detainee Transfer Standard - 1, which is a repeat deficiency

Facility Snapshot/Description

The Jerome Combs Detention Center (JCDC) is located approximately sixty miles southeast of Chicago in Kankakee, Illinois. Adult male ICE detainees of all custody levels, adult male U.S. Marshals Service detainees, and adult male Kankakee County inmates are housed at the detention center. [REDACTED]

The facility was described by the corporal as a one single story building. The perimeter of the facility is comprised of the exterior walls of the building. An armed officer foot patrols the entire perimeter once each shift. The exterior doors of the building are alarmed and accessed by restricted keys. Master control officers monitor the perimeter through a series of fixed and pan/tilt surveillance cameras. The interior of the jail is observed by a surveillance camera network which provides sight lines to all movement in corridors, housing units, and common areas. All movement is escorted.

The facility has eleven housing units including nine units (pods) for general population and two special management units (SMU). The general population housing units are comprised of three twenty to 48-bed dormitories and six units with twelve to 28 two-bed cells. The two SMUs each have eight single-bed cells. ICE detainees are not housed with other jurisdictions. Photo images confirmed that each general population housing unit has a dayroom which contains a television, a sufficient number of telephones, video visitation stations, electronic tablets (with e-mail capability); and a kiosk for ordering commissary, filing requests, and accessing announcements and bulletins. There is no outdoor recreation. Indoor recreation is offered daily.

Sixteen detainees were interviewed during the remote inspection. A language line assisted in the communication with non-English speaking detainees. Detainees indicated general satisfaction with their living area, conditions of confinement, safety, treatment by staff, and ICE officer availability. Three detainees requested larger meal portions, while another stated that the food was "bland." One detainee indicated he was concerned because he has chronic diseases and is worried about COVID-19. The detainee was referred to the HSA, who planned to answer his questions. One detainee indicated that his "dental fillings" had been broken during a cell search and he had not been able to get new ones. Follow up with the HSA and review of the medical record confirmed that the detainee was receiving timely and appropriate care from the dentist and medical staff.

Several detainees stated that the law library was available upon request and that program services were "fine". When asked about cleanliness, the majority of detainees indicated that the facility is clean. Photo



The Nakamoto Group, Inc.

images confirmed that the housing unit was maintained in an acceptable level. All detainees were asked if they had tried to contact the OIG hotline.

Food service is provided by The Country Table (catering vendor) and Kankakee County employees. All other services are provided by county employees. There is no medical co-pay.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations from this remote inspection. Photo and video images were used to facilitate observations during the inspection.

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). No (0) standards were found Does Not Meet Standard and one (1) standard was Not Applicable (N/A). All remaining thirty-eight (38) 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. An out brief was conducted remotely and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following participated:

- ICE Officials – [REDACTED]
- Facility Staff – [REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector

November 25, 2020

Printed Name of LCI

Date