

October 24, 2019

TO: [REDACTED]  
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Kay 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 Kay County Detention Center in Newkirk, Oklahoma during the period of October 22-24, 2019. 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 annual inspection, which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72 hour facilities. This was the first inspection of the facility.

### **Inspection Summary**

The Kay County 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) - 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 annual inspection:

<i>2019 Annual Inspection</i>	
Meets Standards	40
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

The inspection team identified twenty-eight (28) deficient components in the following ten (10) standards:

- Emergency Plans - 3
- Environmental Health and Safety - 6
- Hold Rooms in Detention Facilities - 1
- Key and Lock Control - 2
- Special Management Units - 2
- Tool Control - 1
- Disciplinary System - 1
- Food Service - 9
- Detainee Handbook - 1
- Staff Training - 2

#### **Facility Snapshot/Description**

The Kay County Detention Facility is [REDACTED] located in Newkirk, Oklahoma. The facility is operated by a governmental authority, The Kay County Justice Facilities Authority. The facility began housing ICE detainees on June 24, 2018. The facility currently houses male and female Kay County detainees, Oklahoma DOC inmates, Bureau of Indian Affairs detainees and female ICE detainees. [REDACTED]

The facility consists of a west side having housing pods surrounding a control tower where males are housed and an east side where pods also surround a control tower where females are housed. Currently county female detainees are housed in one pod and female ICE detainee are housed in four pods [REDACTED]. There is a pod dedicated for a Special Management Unit although no ICE detainees have been housed in it. Two of the pods have fifteen cells with two beds per cell and two have an open dormitory design. Detainees are supervised by roving officers and are under constant observation by the officer in the control tower. Cameras also monitor each unit from the facility's central control room located in between the two sides. Both cell and dormitory beds are available. Each housing unit has a dayroom which provides open space and seating for detainees to socialize and tables for board games. The dayrooms contain board games, a television, microwave, and video visitation kiosks. A law library computer and printer are available in a separate room. Each pod is equipped with a television, a bank of electronic tablets, and three detainee telephones. Detainees may visit with family and friends through on-site video equipment, through remote video equipment, or through an on-site non-contact visitation room. Recreation is provided through a gymnasium and an outdoor recreation yard.

Medical, dental and mental health services are provided by employees or contractors of Turn Key Health Clinics. ICE detainees are not charged co-pays for medical, dental or mental health services. All other services are provided by Kay County employees.



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All staff were professional and cordial to the inspection team. All personnel interviewed had an understanding of the National Detention Standards and had a fair understanding of the concept of civil detention.

The inspection team found the atmosphere in the facility to be calm with no obvious indicators of high stress. Staff was observed interacting with detainees in a professional and respectful manner. The inspection team visited the housing units' multiple times during the inspection, interviewing detainees in groups and in a private, confidential settings. There were eighteen detainee interviews conducted in a confidential setting, including ten LEP detainees via the language line, and forty detainee interviews in an open setting. None of the detainees interviewed voiced any concerns with their conditions of confinement. Most remarks were somewhat complimentary of how they were treated by staff and of services provided. All stated that they had frequent contact with ICE officers and key facility staff. All stated that they felt safe at the facility.

### **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. No (0) standards were found Does Not Meet Standard and two (2) standards were Not Applicable (N/A). All remaining forty (40) standards were found to Meet Standard.

### **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 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]

Lead Compliance Inspector

October 24, 2019

Printed Name of LCI

Date