

November 11, 2020

TO: [REDACTED]
Assistant Director for Detention Management

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

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

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS 2019) of the Hardin County Jail in Eldora, Iowa during the period of November 9-11, 2020. This is an IGSA.

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 NDS 2019 for Over 72-hour facilities. The facility received a rating of Acceptable during the September 2019 inspection.

Inspection Summary

The Hardin 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 2019 and 2020 annual compliance inspections:

2019 Annual Inspection	
Meets Standards	37
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

2020 Annual Inspection	
Meets Standards	31
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

The inspection team identified twenty-eight (28) deficient components in the following eleven (11) standards:

- Environmental Health and Safety - 5
- Detainee Funds and Personal Property - 1
- Special Management Units- 4
- Sexual Abuse and Assault Prevention – 1
- Food Service – 3
- Medical Care – 4
- Suicide Prevention and Intervention – 3
- Disability Identification, Assessment, and Accommodations – 2
- Recreation – 1
- Visitation – 3
- Law Library and Legal Materials - 1

Facility Snapshot/Description

The Hardin County Jail is a [REDACTED] indirect-supervision facility located in downtown Eldora, Iowa. The facility, operated by the Hardin County Sheriff's Department, houses male and female detainees for Hardin County and adult male and female ICE detainees of all classification designations. [REDACTED]

[REDACTED] Hardin County Sheriff's Office employees provide all services except medical and food services. Medical services are provided by MEND Correctional Care and the food service department is operated by Summit Food Services, LLC. Detainees are not charged co-pay fees for medical, dental, or mental health services.

The facility is a one and one-half story building housing detainees in single, double, and quadruple bunk cells. There are eight housing units arranged in a circular design around a central control center. The capacity of the housing units ranges from four to thirty detainees. Officers assigned to roving 24-hour correctional posts provide supervision of the housing units while the control center officer maintains visual observation of each housing unit. Additionally, the control center officer continually monitors security cameras that cover all areas of the facility including each cell. ICE detainees are housed separately from local detainees. Detainees are permitted to be out of their cells the majority of the day socializing in the dayroom or participating in other indoor recreational activities. The dayrooms are equipped with televisions, cards, board games, telephones, and kiosks for detainees to use to communicate with facility and ICE staff and make video calls.

At the request of the inspection team, the facility posted sign-up sheets for detainees who wished to speak to the inspectors. Six detainees were interviewed. Two LEP detainees were interviewed by a bilingual inspector. The detainees' stay in the facility ranged from two months to one year. All stated that they felt safe at the facility and they reported no substantive complaints. All complained about the food and stated



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they are being served potatoes too often. One detainee indicated that he had a friend that had a growth on his neck and was only being treated with Tylenol. The detainee was interviewed by a Medical SME. A review of his medical record indicated that the growth is a fatty tumor that does not require removal except for cosmetic purposes.

The facility appears to be well-maintained with acceptable sanitation levels in all areas. During this remote inspection, photographs provided by the facility indicated that the shower areas and common areas are clean; no graffiti was observed. No clutter was observed in the photographs of the cells.

Due to COVID-19, this inspection was conducted remotely. The facility provided the inspection team all requested documentation, photographs, and videos as evidence of practices and procedures within the facility. In addition to these materials, the staff was interviewed by the inspection team. All staff interviewed were well versed in facility policy and the requirements of the standards and were responsive to all requests made by the inspection team.

The facility has developed a COVID-19 plan to limit exposures/infections. All newly admitted detainees are required to have been in ICE custody for fourteen days before being brought to the facility. During the inspection, there were no detainees that had tested positive for the virus.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations noted during the inspection. The inspection was conducted remotely and inspectors were unable to personally observe practices and procedures within the facility. The inspection team relied upon photographs and/or videos to validate the observation of many standards.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards. The facility complies with the ICE National Detention Standards (NDS 2019) unless unobserved practices and conditions are contrary to what was reported to the inspection team. No (0) standards were found Deficient and two (2) standards were Not Applicable (N/A). All remaining thirty-one (31) 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-324 Inspection Form and are supported by documentation in the inspection file. A telephone, call-in out brief was conducted with the facility. In addition to the entire Nakamoto Group Inspection Team, the following participated in the conference call:

- ICE Officials – [REDACTED]

- Facility staff – [REDACTED]

[REDACTED]

