

January 27, 2021

TO: [REDACTED]
Assistant Director for Detention Management

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

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

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS 2019) of the Chase County Detention Center in Cottonwood Falls, Kansas, during the period of January 25-27, 2021. This inspection was scheduled for 2020, but was postponed to 2021 due to the COVID-19 virus. 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 NDS 2019 for Over 72 hour facilities. The facility received a previous rating of Meet Standards during the July 2019 (NDS 2000) annual inspection.

Inspection Summary

The Chase 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) - 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 annual inspection and 2021 annual inspection:

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

2021 Annual Inspection	
Meets Standard	32
Does Not Meet Standard	1
Repeat Finding	0
Not Applicable	0

The inspection team identified forty-eight (48) deficient components in the following eighteen (18) standards:

Environmental Health and Safety – 3
 Admission and Release – 1
 Facility Security and Control – 2
 Detainee Funds and Personal Property – 3
 Hold Rooms in Detention Facilities – 2
 Post Orders – 2
 Searches of Detainees – 9
 Use of Force and Restraints – 3
 Special Management Units – 5
 Disciplinary System – 2
 Food Service – 6
 Medical Care – 2
 Personal Hygiene – 1
 Recreation – 1
 Voluntary Work Program – 2
 Detainee Handbook – 1
 Grievance Procedure – 2
 Detainee Transfers – 1

Facility Snapshot/Description

The Chase County Detention Center was opened in 1993 and is located in Cottonwood Falls, Kansas, approximately 100 miles southwest of Kansas City, Missouri. The facility is owned and operated by the County of Chase. The jail [REDACTED] and employs the indirect model of supervision to all custody levels of adult male and female detainees for ICE, Chase County inmates, and inmates from Morris County, Kansas. [REDACTED]

ICE detainees are comingled in nine independent housing units with populations of similar custody levels. Housing units are cells and open dormitories ranging in configuration of two-person cells to sixteen to twenty bed dormitories. The special management unit (SMU) has five cells with one-single occupancy cell and four double-occupancy cells. Living units appear well lit with both natural and artificial light and have adequate open space for detainees. A housing unit floor plan and photographs of the housing units were provided for review. The dayrooms in each of the housing units are furnished with tables and chairs for detainees to participate in leisure time activities and socializing. The assistant OIC reported that board games, leisure reading material, and televisions are among the amenities available to detainees. Playing cards may be purchased by detainees at the facility's commissary. Kiosks are available in the living units to assist detainees in communicating with family, video visitation, and submitting electronic detainee requests to ICE. The facility



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provides a dedicated area for detainee recreation. The recreation area is covered but equipped with screened openings that allow for natural light and fresh air to enter. Exercise includes walking, jogging, shooting basketball, handball, and kicking a soccer ball. General non-contact visitation and group religious services have been temporarily suspended due to health concerns associated with the COVID-19 virus. Visitors are offered free video visitation services located in the entrance lobby of the facility. Video visitation for a fee is also offered through the housing unit kiosk as an additional alternative for visiting. Currently detainees are receiving 500 free telephone minutes per month through the telephone provider to help maintain positive family ties. Visits from legal representatives have not been suspended. Other COVID-19 response operational changes include all newly received detainees have been quarantined and COVID-19 tested at day fourteen of admission to the Chase County Detention Center.

The facility is reported to be climate controlled and appeared to be in good repair based on photographs reviewed by inspectors. All staff interviewed were well-versed in facility guidelines and operating procedures as well as the National Detention Standards. Officers and staff were professional during interviews and detainees spoke willingly and respectfully. A review of photographs, videos, sanitation inspection reports, and interviews with staff and detainees concluded that the sanitation level of the facility was acceptable.

The inspection team interviewed fifteen LEP and English-speaking detainees housed at the facility. Interviews were held telephonically and with the assistance of an interpreter when needed. There were no substantive concerns voiced when asked about their personal safety, treatment by staff, mail services, recreation programs, or food being served. Two detainees complained of not being provided the medical attention necessary to treat their medical concerns; one complained of a delay in an optometry appointment stating that his vision was getting worse. The medical SME consulted with the Health Services Administrator (HSA) and found that the detainee is scheduled for an optometry appointment on 01/29/2021. The second detainee reported a history of throat cancer and complained that medical services was not responding quick enough to arrange follow up consultations with a medical provider. The medical SME again consulted with the HSA and found that the detainee was scheduled for a follow-up appointment with the medical provider on 01/28/2021. Two detainees stated during interviews that they needed to speak to ICE about their deportation. On the day of the interviews, an ICE officer was at the facility meeting with other detainees and included the two detainees to be interviewed. LEP detainees interviewed confirmed that facility memorandum, posters, and other types of key information are posted in English and Spanish throughout the facility, but some were not clear as to how to obtain interpreter services if needed. This information was provided to the OIC during the closeout briefing.

Finally, all detainees that raised substantive complaints or concerns during the interviews were asked if they had submitted their concerns to the Office of Inspector General. No detainee reported that they had submitted their concerns beyond facility staff.

Food, medical, and maintenance services are provided by Chase County personnel. The facility does not charge co-pays for medical, mental health, or dental care. The facility doctor and mental health services are contracted with local providers. The facility currently does not have a dental provider.

Detainee telephone and kiosk services are provided by Combined Public Communications (CPC) via contract with the facility.

Areas of Concern/Significant Observations

Food Service – Does Not Meet Standard

Policy: Every facility will provide detainees in its care with nutritious and appetizing meals prepared in accordance with the highest sanitary standards.



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Finding: The food service department is providing detainees with three meals per day, but has deviated from the nutritionally balanced diet that has been approved by a registered dietitian. Per the head cook, the approved menu dated 09/02/2020 has been routinely substituted with items recommended by the cooks without the approval of the dietitian. Additionally, the common-fare program menu was dated May 2017 and has not been updated, and items listed in the common-fare program are not always served.

Additionally, a review of documentation revealed that hot and cold food temperatures; refrigeration/freezer temperatures; and the water temperatures of the dishwasher after each meal are not always recorded as required by the standard. These issues may put the detainees at risk, and cannot provide assurance that nutritionally balanced meals are provided to the detainee population and that all meals are prepared, served, and stored in accordance with food service guidelines and the Food Service Standard

Recommendation: Corrective action should be taken to ensure that the approved regular menu is adhered to and that the dietitian review and update all common-fare, medical, and specialty diets. Additionally, efforts should be taken to ensure that all required temperatures are taken and recorded as outlined in the Food Service Standard.

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). One (1) standard was found Does Not Meet Standard and zero (0) standards were Not Applicable (N/A). All other thirty-two (32) standards were found to Meet Standards.

LCI Assurance Statement

The findings of compliance and non-compliance 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 telephonically with facility staff and ICE representatives. In addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials – [REDACTED]

- Facility Staff – [REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector

January 27, 2021

Printed Name of LCI

Date