

December 17, 2020

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Inspection of the Northwest Contract Detention Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 of the Northwest Contract Detention Center in Tacoma, Washington during the period of December 15-17, 2020. This is a CDF.

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 PBNDS 2011 for Over 72-hour facilities. The facility received a rating of Meets Standards during the May 2019 annual inspection.

Inspection Summary

The Northwest Contract Detention Center is currently accredited by:

- The American Correctional Association (ACA) - Yes
- 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 annual inspections:



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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	2

The inspection team identified two (2) deficient components in the following two (2) standards:

Emergency Plans – 1, a priority component

Environmental Health and Safety – 1, a priority component

Facility Snapshot/Description

The Northwest Detention Center is located on the tide flats of the Port of Tacoma which is thirty miles south of Seattle. The facility is a CDF that is owned and operated by The GEO Group, Inc. [REDACTED]

The facility was constructed in 2004. It is surrounded by one fourteen-foot chain link fence supplemented with razor ribbon on top and bottom, and it is encircled by a gravel perimeter road that is patrolled by an armed officer in a vehicle each shift. Surveillance cameras offer visibility around the entire perimeter and into the interior movement corridors. All exterior building doors and interior security gates are under constant camera surveillance and controlled by central control staff. The facility is equipped with a 208-surveillance camera network that is monitored 24 hours a day.

There are six general population housing units; four of the housing units contain three housing pods, and two of the units contain four housing pods. All housing units/pods are configured into either a dormitory setting or a two-tier cell design which contain one or two-beds per cell. Capacities of the celled housing units/pods range from 205-278 beds; and the dormitories from 64-80 beds. There is one special management unit (SMU) which contains twenty two-bed cells. The SMU is dedicated for housing administrative and/or disciplinary segregation status detainees. During the inspection there were nine detainees in the SMU; seven in administrative segregation status and two in disciplinary segregation status. The facility has designated sections of different housing units/pods to serve as COVID-19 wings; they housed 41 detainees during the inspection. All housing areas are managed by direct supervision. The facility is ADA accessible.

Each living area, except the SMU, has a common dayroom which is equipped with a television, fixed table/chair units for detainees to eat their meals, play games, and gather for conversation. There are tablets in each housing unit on which detainees can receive/send emails; conduct video-visits; make telephone calls; send requests directly to facility and ICE/ERO staff; order commissary; file grievances; check their account balance; view the LexisNexis collection, the facility handbook and all announcements and program schedules; and access fee-based entertainment programs. Detainees are provided indoor and outdoor recreation.

Inspectors interviewed eighteen detainees; fourteen from general population and four from the SMU. The sampling included detainees who have been at the facility from one month to fifteen months. An interpreter was used for six of the interviews. Generally, the detainees were satisfied with their stay at the facility. There were several comments and discontent about the food. Some of the detainees felt their medi-



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cal treatment had not cured their condition. The food concerns were discussed with the food service administrator by the safety SME. The menu has been approved by a registered dietician as meeting or exceeding USRDA requirements and the review of the cycle menu showed ethnic diversity in the entrée selections. No further action is necessary. The minor medical concerns raised were discussed with the health services administrator by the medical SME. All complainants had been seen by a medical professional and were provided acceptable and documented care. No further action was required.

Almost all of the detainees were concerned about COVID-19 conditions. The Asian contingent stated, in unison, they were being harassed by the American detainees during their stay. They reported the situations to the officers but felt like they offered no solutions. They wanted more respect from the officers. These matters were brought to the attention of the facility administration by the detainee rights SME.

There were complaints raised about the reliability and serviceability of some housing unit telephones. These allegations, and specific locations, were discussed with the compliance administrator by the detainee rights SME. A telephone company representative is on-site multiple times each week; plans were set for that individual to focus attention to the problem areas.

Overall, the detainees were relatively content with their living conditions, the cleanliness of the facility and their treatment by staff. All detainees were asked if they had filed a grievance or contacted the OIG. If they responded in the negative, they were informed of the grievance process and the availability of the OIG.

An assessment of the general cleanliness of the facility could not be determined due to the remote nature of the inspection.

Medical services are provided by ICE Health Service Corp. Food service and maintenance operations are provided by The GEO Group, Inc. employees. Detainee telephone and tablet services are provided by Talton Communications. ICE detainees are not charged medical co-pays.

Areas of Concern/Significant Observations

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. There were two priority components rated as Does Not Met Standard:

1.1 Emergency Plans:

Component #3 - The facility shall have in place contingency plans for responding to emergencies including a locally approved and annually updated evacuation plan.

Finding: A review of documentation confirmed that the facility has contingency plans for responding to emergencies. The emergency plans include an evacuation plan; however, the evacuation plan was not reviewed by the local fire department during this report period. The emergency plans were reviewed by the facility administrator 4/12/2020.

Recommendation: Submit the evacuation plan to a local fire authority for review and approval.

1.2 Environmental Health and Safety:

Component #14 - The facility has an approved fire prevention, control, and evacuation plan.



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Finding: Priority Component #14 in the PBNDS 2011 Environmental Health and Safety requires that the facility will have an approved fire prevention, control, and evacuation plan. The standard also states that under: ACA 4-ALDF-1C-02 (Mandatory) An evacuation plan is used in the event of fire or major emergency. The plan is approved by an independent outside inspector trained in the application of national fire safety codes and is reviewed annually, updated if necessary, and reissued to the local fire jurisdiction. Although the facility administrator approved the plan on 04/12/2020 it has not been approved by an independent outside inspector since 2016.

Recommendation: The facility should have their fire prevention and evacuation plan approved by an outside source annually.

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 Performance-Based National Detention Standards (PBNDS) 2011 for Over 72-hour facilities. No (0) Standards were rated as Does Not Meet Standard and two (2) standards were Not Applicable (N/A). All remaining forty-one (41) standards were found to be 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. A call-in 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

December 17, 2020

Printed Name of LCI

Date