

January 13, 2021

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Imperial Regional Detention Facility**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2011 with 2016 revisions) of the Imperial Regional Detention Facility in Calexico, California during the period of January 11-13, 2021. This is a CDF 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]
Security	[REDACTED]
Medical Care	[REDACTED]
Medical Care	[REDACTED]
Safety	[REDACTED]

Type of Inspection

This is a scheduled annual inspection that is performed to determine overall compliance with the ICE PBNDS 2011 (with 2016 revisions) for Over 72-hour facilities. The facility received a previous rating of Meets Standards as a result of the January 2020 annual inspection.

Inspection Summary

The Imperial Regional Detention Facility is currently accredited by:

- The American Correctional Association (ACA) – Yes
- The National Commission on Correctional Health Care (NCCCHC) – 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 2020 and 2021 annual compliance inspections:



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2020 Annual Inspection	
Meets Standards	41
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	1

2021 Annual Inspection	
Meets Standards	42
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	1

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

Staff-Detainee Communication—1
Visitation – 1, which is a priority component

Facility Snapshot/Description

The Imperial Regional Detention Facility is owned by the Imperial Valley Gateway Center, LLC. Management and Training Corporation (MTC) contracts with ICE to operate the facility. The facility is located in the eastern outskirts of Calexico, California, approximately 130 miles east of the San Diego International Airport. The facility, constructed in 2014, [REDACTED]
[REDACTED] The facility houses adult male ICE detainees of all classification levels and female ICE detainees classified as low and medium custody. [REDACTED]
[REDACTED]

The facility is a single-level structure containing eleven general population housing units each with a capacity of 64 beds. Both cell and dormitory beds are available. The facility also has a special management unit (SMU) which contains 64 beds. All housing units are provided direct supervision by detention officers; oversight of housing units and hallways is supplemented by multiple cameras mounted inside the units and throughout the facility. Two fourteen-foot fences surround the perimeter. Both fences are enhanced with razor ribbon on and between the fences. Additionally, a vibration sensor shaker system is installed on the interior fence. Mounted cameras provide visual surveillance.

Each general population housing unit has a dayroom area equipped with tables, chairs, two televisions, seven telephones, nine electronic tablets, board games, card games, and a sufficient number of showers and washbasins. There is an outdoor recreation area attached to each general population housing unit which is available to detainees daily between the hours of 7:30 a.m. and 9:00 p.m. The facility has a large recreation yard where detainees may engage in various exercise activities such as walking, jogging, basketball, volleyball, and intramural games. Detainees housed in general population have access to this large outdoor recreation area two hours per day, seven days a week. Detainees housed in the SMU have access to recreation and/or leisure time areas out of their cells two to three hours per day, seven days a week. Detainees in low and medium-low custody are permitted to participate in the voluntary work program outside of their housing unit. The facility offers a variety of educational and training classes to detainees.

In addition to access to telephones for communications, nine electronic tablets are provided in each housing unit; a lesser number are available in the SMU. Detainees may use an electronic tablet to communicate with various facility and ICE staff, file a grievance, order commissary, and access various educational and gaming applications. For a fee, detainees may communicate with family and friends via email, engage in a video visit, or download music and videos.



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All detainees arriving at the facility are placed in a fourteen-day cohort (quarantine status) due to COVID-19 protocols. Detainees are classified prior to placement in the cohort status. Additionally, ICE suspended on-site general/social visitation for ICE detainees in March 2020. Legal and professional visitation are exempt from this suspension. To mitigate the impact of the visitation suspension, ICE provides each detainee with thirteen, ten-minute free telephone calls each week. The suspension of non-employee volunteers entering the facility has also impacted various programs.

The facility achieves optimal compliance by providing telephones at a ratio of at least one telephone per ten detainees; two televisions per dayroom so that one is tuned to English and the other to Spanish; wireless headsets for television viewing; a variety of educational programming; a TTY phone and video relay phone for detainees who are deaf or hard of hearing; and two hours of recreation, seven days per week in the SMU.

Eleven detainees were interviewed individually by telephone. Two of the interviews were with detainees with limited English proficiency (LEP) who spoke Nepali; a telephonic language line interpreter service was used to facilitate these interviews. Three of the eleven interviews were with detainees housed in the SMU. Most of the detainees interviewed told the inspectors that at least some of the tablets in their housing unit are frequently inoperable. This issue was also cited in the OIG report dated December 18, 2020. Facility staff are aware of this issue and stated they work diligently with the vendor, Talton Communications, to repair and keep the tablets operational. Documentation reviewed supported that the facility communicates frequently with the vendor regarding the tablets and the telephones. One female detainee stated that the water in the shower was too hot and made her skin very dry. Logs maintained by the facility indicated that water temperatures in the showers were within the acceptable range. The medical staff examined the detainee during the inspection and concluded that her skin appeared normal in color and appearance with no evidence of a rash or burns. Another detainee asserted several complaints all of which in some way involved the behavior or actions of an officer. The inspector followed-up on the complaints and found that for each complaint the detainee had filed a grievance and received a response. All of the grievances were determined to be unfounded by facility staff. A detainee housed in the SMU stated that the television was not working correctly. The inspector followed-up with the compliance manager and learned that the facility is currently changing service providers and channel selection is limited until the conversion is completed. The detainee also complained that the printer for the law library computer was not working. Printing services for the law library at the facility are handled by the library clerk who makes daily rounds to all the housing units including the SMU. The detainees interviewed did not state any concerns regarding their physical safety. They were generally satisfied with the interaction, responsiveness, and professionalism of facility and ICE staff and with access to medical services, mail, the law library, telephones, and recreation. The detainees interviewed were aware of the process for filing a grievance or contacting the OIG. Detainees understood that some services and programs were more limited than usual due to protocols implemented in response to the COVID-19 pandemic.

Detainee telephone services are provided via a contract with Talton Communications. All other services are provided by MTC.

ICE detainees do not incur medical co-pays.

Areas of Concern/Significant Observation

The inspection team did not identify any areas of concern or 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 a review of policies, procedures, logs, photographs, and/or videos to validate the observation of many standards. Additionally, interviews were conducted with multiple key staff members.



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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 with 2016 revisions). No (0) standards were found Does Not Meet Standard and one (1) standard was Not Applicable (N/A). All remaining forty-two (42) standards were found to Meet Standards.

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 by telephone conference call and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following persons participated in the call:

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

[REDACTED]

[REDACTED], Lead Compliance Inspector

January 13, 2021

Printed Name of LCI

Date