



**U.S. Department of Homeland Security**  
U.S. Immigration and Customs Enforcement  
Office of Professional Responsibility  
Inspections and Detention Oversight Division  
Washington, DC 20536-5501

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**Office of Detention Oversight**  
**Follow-Up/Interim Compliance Inspection**

**Enforcement and Removal Operations**  
**ERO San Antonio Field Office**

**Limestone County Detention Center**  
**Groesbeck, Texas**

**July 19-22, 2021**

**FOLLOW-UP/INTERIM COMPLIANCE INSPECTION**  
**of the**  
**LIMESTONE COUNTY DETENTION CENTER**  
Groesbeck, Texas

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## **FOLLOW-UP/INTERIM COMPLIANCE INSPECTION TEAM MEMBERS**



Acting Team Lead  
Assistant Team Lead  
Contractor  
Contractor  
Contractor  
Contractor

ODO  
ODO  
Creative Corrections  
Creative Corrections  
Creative Corrections  
Creative Corrections

## FACILITY OVERVIEW

The U.S. Immigration and Customs Enforcement (ICE) Office of Professional Responsibility (OPR) Office of Detention Oversight (ODO) conducted a follow-up/interim compliance inspection of the Limestone County Detention Center (LCDC) in Groesbeck, Texas, from July 19 to 22, 2021.<sup>1</sup> The facility opened in 1990, is owned by Limestone County, and is operated by LaSalle Corrections. The ICE Office of Enforcement and Removal Operations (ERO) began housing detainees at LCDC in 2019 under the oversight of ERO’s Field Office Director in San Antonio (ERO San Antonio). ODO’s last inspection of LCDC was March 1 to 4, 2021, during which the facility operated under the National Detention Standards (NDS) 2019. The facility now operates under the NDS 2000.

ERO does not have assigned deportation officers or a detention services manager to the facility. An LCDC warden handles daily facility operations and manages █████ support personnel. LaSalle Corrections provides food services and medical care, and Correct Commissary provides commissary services at the facility. The facility does not hold any accreditations from any outside entities.

Capacity and Population Statistics	Quantity
ICE Detainee Bed Capacity <sup>2</sup>	████
Average ICE Detainee Population <sup>3</sup>	████
Male Detainee Population (as of July 19, 2021)	████
Female Detainee Population (as of July 19, 2021)	N/A

During its last inspection, in Fiscal Year (FY) 2021, ODO found 23 deficiencies in the following areas: Environmental Health and Safety (2); Admission and Release (1); Custody Classification System (1); Facility Security and Control (1); Funds and Personal Property (3); Use of Force and Restraints (1); Special Management Units (6); Sexual Abuse and Assault Prevention and Intervention (1); Medical Care (5); and Significant Self-Harm and Suicide Prevention and Intervention (2).

<sup>1</sup> This facility holds male detainees with low, medium-low, medium-high, and high-security classification levels for periods longer than 72 hours.

<sup>2</sup> Data Source: ERO Facility List Report as of July 12, 2021.

<sup>3</sup> *Ibid.*

## **FOLLOW-UP/INTERIM COMPLIANCE INSPECTION PROCESS**

ODO conducts oversight inspections of ICE detention facilities with an average daily population of 10 or more detainees, and where detainees are housed for longer than 72 hours, to assess compliance with ICE National Detention Standards. These inspections focus solely on facility compliance with detention standards that directly affect detainee life, health, safety, and well-being. In FY 2021, to meet congressional requirements, ODO began conducting follow-up inspections at all ICE ERO detention facilities, which ODO inspected earlier in the FY.

Follow-Up/Interim Compliance Inspections focus on facilities that changed their contractually required ICE National Detention Standards (i.e., from NDS 2019 to NDS 2000) following their first ODO inspection of the FY. ODO will conduct a complete review of several core standards, in accordance with the facility's new contractually required ICE National Detention Standards, which include but are not limited to Medical Care/Health Care, Medical Care (Women)/Health Care (Females), Hunger Strikes, Suicide Prevention, Food Service, Environmental Health and Safety, Emergency Plans, Use of Force and Restraints/Use of Physical Control Measures and Restraints, Special Management Units, Educational Policy (FRS only), Behavior Management (FRS only), Admission and Release, Classification, and Funds and Personal Property. ODO may decide to conduct a second full inspection of a facility in the same FY based on additional information obtained prior to ODO's arrival on-site. Factors ODO will consider when deciding to conduct a second full inspection will include the total number of deficiencies cited during the first inspection, the number of deficient standards found during the first inspection, the completion status of the first inspection's UCAP, and other information ODO obtains from internal and external sources ahead of the follow-up compliance inspection. Conditions found during the inspection may also lead ODO to assess new areas and identify new deficiencies or areas of concern should facility practices run contrary to ICE standards.

ODO was unable to conduct an on-site inspection of this facility, as a result of the COVID-19 pandemic, and instead, conducted a remote inspection of the facility. During this remote inspection, ODO interviewed facility staff, ERO field office staff, and detainees, reviewed files and detention records, and was able to assess compliance for at least 90 percent or more of the ICE national detention standards reviewed during the inspection.

## FINDINGS BY NATIONAL DETENTION STANDARDS 2000 MAJOR CATEGORIES

NDS 2000 Standards Inspected <sup>4</sup>	Deficiencies
<b>Part 1 – Detainee Services</b>	
Admission and Release	4
Detainee Classification System	0
Food Service	0
Funds and Personal Property	0
<b>Sub-Total</b>	<b>4</b>
<b>Part 2 – Security and Control</b>	
Emergency Plans	0
Environmental Health and Safety	20
Special Management Units (Administrative Segregation)	0
Special Management Unit (Disciplinary Segregation)	0
Use of Force	0
<b>Sub-Total</b>	<b>20</b>
<b>Part 3 – Health Services</b>	
Hunger Strikes	0
Medical Care	1
Suicide Prevention and Intervention	0
<b>Sub-Total</b>	<b>1</b>
<b>Other Standard Inspected</b>	
NDS 2019 Sexual Abuse and Assault Prevention and Intervention	0
<b>Sub-Total</b>	<b>0</b>
<b>Total Deficiencies</b>	<b>25</b>

<sup>4</sup> For greater detail on ODO's findings, see the *Follow-Up Compliance Inspection Findings* section of this report.

## DETAINEE RELATIONS

ODO interviewed 12 detainees, who each voluntarily agreed to participate. None of the detainees made allegations of discrimination, mistreatment, or abuse. Most detainees reported satisfaction with facility services except for the concern listed below. ODO attempted to conduct detainee interviews via video teleconference; however, ERO San Antonio and the facility were not able to accommodate this request due to technology issues. As such, the detainee interviews were conducted via telephone.

*Admission and Release:* Three detainees stated they did not receive the ICE National Detainee Handbook nor the facility supplemental handbook.

- Action Taken: ODO reviewed the detainees' detention files, interviewed the facility compliance officer, and found signed acknowledgements from each detainee indicating their receipt of both the ICE National Detainee Handbook and facility supplemental handbook during their respective intake processing. On July 21, 2021, the facility provided additional copies of the handbooks to the detainees.

## FOLLOW-UP/INTERIM COMPLIANCE INSPECTION FINDINGS

### DETAINEE SERVICES

#### ADMISSION AND RELEASE (AR)

ODO reviewed [REDACTED] detainee detention files and found [REDACTED] of the files contained an Order to Detain or Release Form (Form I-203 or I-203a) (**Deficiency AR-34<sup>5</sup>**).

ODO interviewed facility staff and found ERO San Antonio did not approve the facility's orientation procedures (**Deficiency AR-54<sup>6</sup>**).

ODO reviewed [REDACTED] detainee release files and found [REDACTED] of the files contained a Form I-203a, which authorizes the release process (**Deficiency AR-72<sup>7</sup>**).

ODO interviewed facility staff and found ERO San Antonio did not approve the facility's release procedures (**Deficiency AR-73<sup>8</sup>**).

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<sup>5</sup> "An order to detain or release (Form I-203 or I-203a) bearing the appropriate official signature shall accompany the newly arriving detainee." See ICE NDS 2000, Standard, Admission and Release, Section (III)(H).

<sup>6</sup> "In IGSA's, the INS office of jurisdiction shall approve all orientation procedures." See ICE NDS 2000, Standard, Admissions and Release, Section (III)(J).

<sup>7</sup> "Staff must complete certain procedures before any detainee's release, removal, or transfer from the facility. Necessary steps include completing and processing forms, closing files, fingerprinting; returning personal property; and reclaiming facility-issued clothing, bedding, etc." See ICE NDS 2000, Standard, Admission and Release, Section (III)(2nd J).

<sup>8</sup> "INS will approve the IGSA release procedures." See ICE NDS 2000, Standard, Admission and Release, Section (III)(2nd J).

## SECURITY AND CONTROL

### ENVIRONMENTAL HEALTH AND SAFETY (EHS)

ODO interviewed a facility lieutenant and found the facility allows detainees to use barber tools successively on multiple detainees without disinfecting the tools between each use (**Deficiency EHS-83<sup>9</sup>**).

ODO interviewed a facility lieutenant and found the facility does not have a separate room for the barber shop (**Deficiency EHS-84<sup>10</sup>**). Additionally, because the facility does not have a barber shop:

- The facility does not have a barber shop with a smooth floor that is nonabsorbent and easily cleaned (**Deficiency EHS-85<sup>11</sup>**).
- The facility does not have a barber shop with walls painted a light color (**Deficiency EHS-86<sup>12</sup>**).
- The facility does not have a barber shop with artificial lighting with a rating of at least 50-foot candles (**Deficiency EHS-87<sup>13</sup>**).
- The facility does not have a barber shop with mechanical ventilation rated of 5 air changes per hour if there are no operable windows to provide fresh air (**Deficiency EHS-88<sup>14</sup>**).
- The facility does not have a barber shop with at least one lavatory (**Deficiency EHS-89<sup>15</sup>**).
- The facility does not have a barber shop with hot and cold water available (**Deficiency EHS-90<sup>16</sup>**).
- The facility does not have a barber shop with all the equipment and facilities necessary for maintaining sanitary procedures of hair care (**Deficiency EHS-91<sup>17</sup>**).
- The facility does not have a barber shop with appropriate cabinets, covered metal containers for waste, disinfectants, dispensable headrest covers, laundered towels and haircloths (**Deficiency EHS-92<sup>18</sup>**).

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<sup>9</sup> “Instruments such as combs and clippers will not be used successively on detainees without proper cleaning and disinfecting.” *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P).

<sup>10</sup> “The operation will be located in a separate room not used for any other purpose.” *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

<sup>11</sup> “The floor will be smooth, nonabsorbent and easily cleaned.” *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

<sup>12</sup> “Walls and ceiling will be in good repair and painted a light color.” *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

<sup>13</sup> “Artificial lighting of at least 50-foot candles will be provided.” *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

<sup>14</sup> “Mechanical ventilation of 5 air changes per hour will be provided if there are no operable windows to provide fresh air.” *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

<sup>15</sup> “At least one lavatory will be provided.” *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

<sup>16</sup> “Both hot and cold water will be available, and the hot water will be capable of maintaining a constant flow of water between 105 degrees and 120 degrees.” *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

<sup>17</sup> “Each barbershop will be provided with all equipment and facilities necessary for maintaining sanitary procedures of hair care.” *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(2).

<sup>18</sup> “Each shop will be provided with appropriate cabinets, covered metal containers for waste, disinfectants,



ODO interviewed a facility lieutenant and found the facility does not disinfect barber equipment after use between each detainee (**Deficiency EHS-93<sup>19</sup>**).

Furthermore, because the facility does not have a barber shop, there are no posted and detailed hair care sanitation regulations (**Deficiency EHS-95<sup>20</sup>**). In addition, because the facility does not have detailed rules, the facility does not inform detainees to:

- Disinfect scissors, combs, and other tools before use on another detainee (**Deficiency EHS-96<sup>21</sup>**).
- Immerse clipper blades in disinfectant solution before use on another detainee (**Deficiency EHS-97<sup>22</sup>**).
- Refrain from using any headrest cover, neck strap, towel or washcloth that has been used another detainee, unless it had been properly laundered since its last use (**Deficiency EHS-99<sup>23</sup>**).
- Refrain from making shaving lather in a wash basin or lavatory (**Deficiency EHS-104<sup>24</sup>**).
- Refrain from removing or treating blackheads, carbuncles, infected hairs, or any sores or lesions (**Deficiency EHS-106<sup>25</sup>**).
- Refrain from pulling hair from ears, nostrils, eyebrows, and moustaches (**Deficiency EHS-107<sup>26</sup>**).
- Refrain from serving any detainee with inflamed, scaling, pus-filled, or erupted skin (**Deficiency EHS-108<sup>27</sup>**).
- Refrain from serving any detainees infested with head lice (**Deficiency EHS-109<sup>28</sup>**).

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dispensable headrest covers, laundered towels and haircloths.” See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(2).

<sup>19</sup> “Between detainees, all hair care tools coming in contact with the detainees will be cleaned and effectively disinfected.” See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(3).

<sup>20</sup> “Each barbershop will have detailed hair care sanitation regulations posted in a conspicuous location for the use of all hair care personnel and detainees.” See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4).

<sup>21</sup> “All scissors, combs or other tools (except clippers) will be thoroughly washed with soap and hot water to remove film and debris and effectively disinfected immediately after use on each detainee and before being used for the service of any other detainee.” See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(a).

<sup>22</sup> “After cleaning, the clipper blades will be immersed in the disinfectant solution and agitated for a period of not less than 15 seconds before use on any other detainee. The solution will be replaced as often as necessary.” See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(b).

<sup>23</sup> “No hair care specialist will use for the service of a detainee any headrest cover, neck strap, towel, or washcloth that has been used for any other detainee, unless the same will have been properly laundered since its last use.” See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(c).

<sup>24</sup> “The making of shaving lather in a wash basin or lavatory for use in serving a detainee is prohibited.” See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(g).

<sup>25</sup> “The removal or treatment of blackheads, carbuncles, infected hairs, or any sores or lesions is prohibited.” See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(l).

<sup>26</sup> “The pulling of hair from ears, nostrils, eyebrows, and moustaches is prohibited.” See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(j).

<sup>27</sup> “No barber or beautician will serve any detainee when the skin of the detainee’s face, neck, or scalp is inflamed, scaling, contains pus, or is erupted, unless service of such detainee is performed in accordance with the specific authorization of the Chief Medical Officer.” See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(k).

<sup>28</sup> “No person will be served when infested with head lice.” See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(i).

## **HEALTH SERVICES**

### **MEDICAL CARE (MC)**

ODO reviewed [REDACTED] detainee health records and found in [REDACTED] a registered nurse conducted the initial dental screening instead of a physician, physician's assistant, or nurse practitioner (**Deficiency MC-51<sup>29</sup>**).

## **CONCLUSION**

During this inspection, ODO assessed the facility's compliance with 12 standards under NDS 2000 and 1 standard under NDS 2019 and found the facility in compliance with 9 of those standards. ODO found 25 deficiencies in the remaining 3 standards. ODO commends facility staff members for their responsiveness during this inspection. ODO recommends ERO San Antonio work with the facility to resolve any deficiencies that remain outstanding in accordance with contractual obligations. ODO has not received the uniform corrective action plan for ODO's last inspection of LCDC in March 2021.

<b>Compliance Inspection Results Compared</b>	<b>First FY 2021 (NDS 2019)</b>	<b>Second FY 2021 (NDS 2000)/ (NDS 2019)</b>
Standards Reviewed	18	12/1
Deficient Standards	10	3
Overall Number of Deficiencies	23	25
Repeat Deficiencies	0	N/A
Areas of Concern	0	0
Corrective Actions	0	0

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<sup>29</sup> "If no on-site dentist is available, the initial dental screening may be performed by a physician, physician's assistant or nurse practitioner." See ICE NDS 2000, Standard, Medical Care, Section (III)(E).