



November 4, 2021

TO: [REDACTED]
Acting Assistant Director Custody Management

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

SUBJECT: **Annual Inspection of the Bluebonnet Detention Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 of the Bluebonnet Detention Center in Anson, Texas during the period of November 2-4, 2021. This is a DIGSA.

The annual inspection was performed under the guidance of [REDACTED], Lead Compliance Inspector. Team members were:

Subject Matter Field	Team Member
Safety	[REDACTED]
Security	[REDACTED]
Medical Care	[REDACTED]
Detainee Rights	[REDACTED]
Medical Care	[REDACTED]

Type of Inspection

This is a scheduled annual inspection to determine overall compliance with the ICE PBNDS 2011 for Over 72-hour facilities. The facility received a rating of Meets Standards during the July 2021 annual inspection.

Inspection Summary

The Bluebonnet 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) - 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 July 2021 and November 2021 PBNDS annual inspections:



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<i>July 2021 Annual Inspection</i>	
Meets Standards	41
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

<i>November 2021 Annual Inspection</i>	
Meets Standards	41
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

The inspection team identified zero (0) deficient components.

Facility Snapshot/Description

The Bluebonnet Detention Center is located in a rural area outside of Anson, Texas. The facility is owned by Jones County, Texas and operated by Management & Training Corporation (MTC, facility operator). During the first day of the inspection this DIGSA facility housed [REDACTED] adult male and female detainees of all classification levels. [REDACTED]

The facility was built in [REDACTED]. The complex is a large single one-story building. The secure outer perimeter of the compound is designed with two twelve-foot chain link fences with rows of razor ribbon affixed to both fencing runs. The interior fence is supplemented with a movement detection system (shaker fence). The facility is encircled by a perimeter road that is patrolled by an unarmed officer in a vehicle 24 hours a day. Surveillance cameras offer visibility around the entire perimeter, into the housing units, outdoor recreation yards, the common areas, and interior movement corridors. All building doors are controlled by central control staff and are under constant camera surveillance through a 144-surveillance camera network that is monitored 24 hours a day.

The facility has [REDACTED] individual general population housing units managed by direct and indirect supervision. All movement is escorted. The general population housing units are all dormitory settings ranging in size from [REDACTED] beds. There are two special management units (SMU): [REDACTED] These cells are dedicated to house only disciplinary and administrative segregation status detainees. There was one detainee housed in the SMU during this inspection. The health care unit is not an infirmary but does have three two-bed rooms that are used for treatment and/or observation.

The facility has dedicated sections of its housing units to serve as COVID-19 quarantine/isolation wings where newly admitted detainees and existing detainees are housed until negative testing results/protocols are complete. There were seven active COVID-19 patients quarantined for treatment and observation during the inspection.

Each housing unit has a common dayroom equipped with at least two televisions; fixed table/chair units for detainees to eat their meals, play games and gather for conversation; a bank of wall-mounted telephones; tablets 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 account balances, view the LexisNexis collection, access the handbooks and all announcements/schedules; and participate in fee-based entertainment programming. Dayrooms are accessible from 6:00 a.m. to 12:00 a.m. on Mondays to Fridays, and from 6:00 a.m. to 1:00 a.m. on weekends and holidays. Each detainee is assigned a lockable personal property storage bin. All detainees are provided daily indoor and outdoor recreation. The facility is maintaining an above average level of sanitation.



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The facility restored on-site non-contact general/family visitation on September 23, 2021. This action returns normal pre-COVID-19 visitation privileges that adhere to all visitation standards and their expectations. Legal visitation continued through COVID-19 conditions and is still offered as an on-site contact or non-contact option.

Optimal levels of compliance are present in the following standards: Special Management Units, outdoor recreation is provided at least two hours a day, seven days a week for administrative segregation status detainees, and at least one hour a day, seven days a week for disciplinary segregation detainees; Medical Care, the facility has adequate space and staffing are available for tele-health systems; Use of Force, audio visual records are retained for one year after conclusion of investigation or litigation; Recreation, detainees are provided wireless headsets for television viewing; Telephone Access, the telephone ratio is one telephone for every ten detainees; and Law Libraries and Legal Materials, access is more than fifteen hours per week.

The inspectors conducted 38 public and/or confidential detainee interviews during the inspection; four required an interpreter. Their length of stay in the facility ranged from one week to one year. There were no substantive comments/complaints raised about their treatment by staff or other detainees, their sense of safety in the facility, medical care, the food, recreation schedule, visitation privileges, cleanliness of their living area, accessibility to and response from ICE/ERO staff, law library access, or their overall satisfaction with the experience in the facility. Very few detainees had filed a grievance. Most detainees were unaware of the OIG and its service; they were subsequently informed of their purpose and how they could contact them.

There were no deaths, suicide attempts, escapes, hunger strikes, or immediate or calculated uses of force reported during this inspection period.

Medical, dental, and mental health are provided by MTC employees. Detainee telephone and tablet services are provided by Talton Communication. Detainees are not charged co-pays for medical, mental health, or dental care services.

Areas of Concern/Significant Observations

This was a hybrid inspection in which some of the inspectors work remotely. Remote inspectors were unable to personally observe practices and procedures within the facility and 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 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 Meet Standards.

LCI Assurance Statement

The findings are accurately and completely documented on the G-324 Inspection Form and are supported by documentation in the inspection file. An out-brief conference call was conducted at the facility. In addition to the entire Nakamoto Group, Inc. Inspection Team (some telephonically) the following were present:

