



The Nakamoto Group, Inc.

August 4, 2022

TO: [REDACTED]
Acting Assistant Director Custody 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 hybrid 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 August 2-4, 2022. This is an IGSA.

The inspection was performed under the guidance of Lead Compliance [REDACTED] 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 for Over 72-hour facilities. The facility received a previous rating of Meets Standards during the August 2021 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 2021 and 2022 annual compliance inspections:



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

2022 Annual Inspection	
Meets Standard	33
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	0

The inspection team identified twenty-two (22) deficient components in the following thirteen (13) standards:

- Custody Classification – 2, one of which is a repeat deficiency
- Facility Security and Control – 1
- Hold Rooms in Detention Facilities – 3
- Post Orders – 1
- Special Management Units – 1
- Sexual Abuse and Assault Prevention – 2
- Food Service – 1
- Medical Care – 4
- Suicide Prevention and Intervention – 2, both of which are repeat deficiencies
- Disability Identification, Assessment and Accommodation – 1
- Correspondence and Other Mail – 1
- Telephone Access – 2, one of which is a repeat deficiency
- Legal Rights Group Presentations – 1

Facility Snapshot/Description

The Chase County Detention Center 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. With a capacity of [REDACTED] beds, this IGSA houses all custody levels of adult male and female detainees for ICE and the U.S. Marshals Service. [REDACTED]

The facility is a single-story structure with [REDACTED]-tiered housing units that includes open dormitory and celled housing ranging in configuration of [REDACTED]-person cells to [REDACTED] bed dormitories. There is one special management unit (SMU) containing [REDACTED]-occupancy cells and [REDACTED]-occupancy cells totaling [REDACTED] isolation beds. No detainee was housed in SMU during the inspection. The medical unit has [REDACTED] negative pressure observation rooms; each is [REDACTED] occupancy. The facility does not maintain infirmary beds.

The living units were found to be well lit with both natural and artificial light and adequate open space for detainees. The dayrooms are furnished with picnic style tables with attached chairs for detainees to participate in leisure time activities, play board games, and play cards. Televisions are available to view in each housing unit as well as kiosks that are programmed for video visitation, family communications and submitting electronic detainee requests to ICE. Group religious services have been suspended due to health concerns associated with the COVID-19 virus. An onsite video visitation kiosk is available to families of detainees at no cost, seven days per week, allowing for thirty minutes of virtual visiting each session. Detainees are not limited to the number of visits that they receive each week. Remote video visitation is also available to detainees through a video call provider as a general visitation option; however, this service is not free. As a COVID-19 precaution, all newly received detainees are quarantined upon admission to the facility for five days. Detainees complaining of symptoms will be COVID-19 tested immediately. The facility provides a dedicated recreation area this is covered but equipped with screened openings that allow for natural light and fresh air to enter. Exercise activities include walking, jogging, pull up bar, shooting basketball, handball and kicking a soccer



ball. The recreation area has drinking water available, but detainees are escorted back to their housing unit if a restroom break is required. Detainees participate in the voluntary work program limited to work assignments in the laundry.

The facility is climate controlled, and the physical plant was found to be in good repair. All staff interviewed were well-versed in facility guidelines and operating procedures as well as the National Detention Standards. Officers and other staff were professional during interviews and detainees interviewed spoke willingly and respectfully. The facility employs a small number of bilingual staff, so translation services are largely relied upon but easily accessible to assist in communicating with limited English proficient (LEP) detainees. A review of sanitation inspection reports, interviews with staff and detainees, and observation by onsite inspectors concluded that the sanitation level of the facility was acceptable.

The inspection team interviewed or offered an interview to all 66 detainees housed at the facility during the inspection including twenty formal interviews. Limited English proficient detainees were interviewed with the assistance of an interpreter or bilingual inspection team members. There were no substantive concerns voiced when asked about personal safety, access to mail, treatment by staff, access to recreation or assistance from ICE personnel. Inspectors verified that memoranda, posters, and other types of key information are posted in English and Spanish throughout the facility. While conducting formal interviews, all detainees confirmed receiving a National Detainee Handbook and local supplement upon admission to the facility. Some detainees complained that the volume of the television in the housing units made it difficult to hear and speak to family members on the telephone. This concern was brought to the attention of the OIC who agreed that this was an obvious distraction and committed to looking into installing a wireless headphone system for detainees to use while watching television. All detainees spoke highly of the quality of food and portion sizes; however, two detainees complained that when food was carted to the living areas food trays were left uncovered. The safety subject matter expert (SME) observed the preparation and delivery of the lunch meal on the second day of the inspection and found that meal trays are being left open when delivered to the housing units. The safety SME shared his observations with the head cook and the OIC and reminded both of Food Service Standard requirements. A follow-up inspection of meal delivery on the final day of the inspection found that individual meals were properly covered when being carted to the housing units. One detainee complained that his wisdom teeth needed extracted and was causing him pain. He indicated that he was assessed by medical and referred to the contract dentist for oral surgery, but has yet to be treated. The medical subject matter expert (SME) reviewed medical notes regarding the detainee's concern and found that medical staff referred the detainee to the contracted dentist for oral surgery which is scheduled for August 15, 2022. The medical SME found that the delay in treatment was caused by patient backlog of the contract dentist. Finally, two LEP detainees alleged that the shower curtain liners were seldom changed, are worn and periodically develop mold build up. In a follow-up inspection by the safety SME, he found that staff removed all existing shower curtain liners and replaced them with new. Detainees were reminded of the proper procedures for filing grievances and the availability of the OIG hotline for submitting complaints.

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. Combined Public Communications (CPC) provides detainee telephone and kiosk services including video visitation.

Areas of Concern/Significant Observations

The inspection was conducted as a hybrid. Four inspectors were on site and one inspector worked remotely. The remote inspector was unable to personally observe practices and procedures within the facility and relied on on-site inspector's observations, photographs, and/or videos to validate the observation of many standards. There were no areas of concern or significant observations.



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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 National Detention Standards. No (0) standard was rated as Does Not Meet Standard and no (0) standard was Not Applicable (N/A). All thirty-three (33) 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, with some participating telephonically, was conducted and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following participated:

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

[REDACTED] Lead Compliance Inspector August 4, 2022
Printed Name of LCI Date