



October 15, 2020

TO: [Redacted]  
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Clay County Justice Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2008 of the Clay County Justice Center in Brazil, Indiana during the period of October 13-15, 2020. This is an IGSA facility.

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

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

**Type of Inspection**

This is a scheduled annual remote inspection, which is performed to determine overall compliance with the ICE PBNDS 2008 for Over 72 hour facilities. The facility received a rating of Meets Standards during the May 2019 inspection.

**Inspection Summary**

The Clay County Jail 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 2019 and 2020 PBNDS 2008 compliance annual inspections:



<b>2019 Inspection</b>		<b>2020 Inspection</b>	
Meets Standards	38	Meets Standards	39
Does Not Meet Standards	1	Does Not Meet Standards	0
Repeat Finding	0	Repeat Finding	0
Not Applicable	2	Not Applicable	2

The inspection team identified four (4) deficient components in the following four (4) standards:

- Special Management Units – 1, which is a repeat deficiency
- Personal Hygiene – 1, which is a repeat deficiency
- Recreation – 1, which is a repeat deficiency
- Staff Training – 1, which is a repeat deficiency

### Facility Snapshot/Description

The Clay County Justice Center (CCJC) is owned by Clay County and operated under the jurisdiction of the Clay County Sheriff’s Office. The facility is located approximately forty miles southwest of Indianapolis in Brazil, Indiana. The facility houses adult male and female Clay County detainees and adult male and female ICE detainees of all classification levels.

According to the jail commander, the CCJC physical plant consists of a two-story building housing the administrative offices of the Clay County Sheriff’s Office, Department of Natural Resources, and the jail. There is no perimeter fencing around the building. The perimeter is foot patrolled by an armed officer during select shifts. The exterior perimeter of the building is the exterior walls of the building. The entire perimeter is under camera surveillance. Access through all exterior doors is controlled by central control officers.

The jail consists of nine individual pod style housing units: two housing units are equipped with two-bed cells; four housing units are equipped with four-bed cells; and three dormitories range in size from six to 24 beds. The facility is under a multiple surveillance camera network which provides sight lines into all critical housing and common areas. Housing areas provide adequate open dayroom space which is accessible to detainees daily from 6:00 a.m. to 11:00 p.m. Photo images confirmed that each housing unit is equipped with a television, a telephone bank, an informational kiosk, and stainless-steel tables with attached stools. The facility does not offer outdoor recreation. The daily schedule governs detainee movement. All movement is escorted.

Visiting privileges are scheduled through a video visitation platform. Photo images confirmed the location of a video visiting station in each housing unit and a bank of monitors in a room adjacent to the front visitor entrance. Daily visits are permitted and can be conducted onsite or from a remote location.

The inspection team interviewed 21 detainees. Five detainees stated they had not received a copy of the local handbook, despite their signature on a receipt indicating they had received it. During day one of the inspection, all detainees were provided a copy of the local handbook in a language they could understand.

Detainees stated, without exception, that they did not fear for their safety and that officers treat them with respect. Detainees registered no substantive concerns regarding food, medical care, access to telephones, legal materials, conditions of confinement, or accessibility to ICE/ERO personnel. The detainees verified that ICE personnel visit the housing units every week and are prompt in responding to their requests. Two detainees stated that cleaning supplies were not always readily available. This concern was shared with the ICE liaison sergeant who confirmed that cleaning supplies are provided to detainees daily. No detainee tried to access the OIG

