January 17, 2019

TO: Assistant Director for Detention Management

FROM: 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) of the Imperial Regional Detention Facility in Calexico, California, during the period of January 15-17, 2019. This is a DIGSA facility.

The inspection was performed under the guidance of Lead Compliance Inspector. Team members were:

<table>
<thead>
<tr>
<th>Subject Matter Field</th>
<th>Team Member</th>
</tr>
</thead>
<tbody>
<tr>
<td>Detainee Rights</td>
<td></td>
</tr>
<tr>
<td>Security</td>
<td></td>
</tr>
<tr>
<td>Medical Care</td>
<td></td>
</tr>
<tr>
<td>Medical Care</td>
<td></td>
</tr>
<tr>
<td>Safety</td>
<td></td>
</tr>
</tbody>
</table>

**Type of Inspection**

This is a scheduled annual inspection, which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72 hour facilities. The facility received a previous rating of Meets Standards during the January 2018 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 (NCCHC) - Yes
- 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 2018 and 2019 annual inspections:
Facility Snapshot/Description

The Imperial Regional Detention Facility is designated as an ICE dedicated IGSA (DIGSA) facility owned by the city of Holtville, CA. The city of Holtville has an IGSA with ICE and has contracted with Management and Training Corporation (MTC) to operate the facility. The facility is physically located in the eastern outskirts of Calexico, CA, approximately 130 miles east of the San Diego International Airport. The facility opened in 2014. This DIGSA houses adult male ICE detainees of all classification levels and currently houses female ICE detainees classified as low custody. The facility accepts medium custody female detainees. Juveniles are not housed in this facility.

The facility is a single level structure containing eleven general population housing units. Of the eleven units, two housing units consist of double bed cells. The other nine are open bay dormitories. Both cell and dormitory housing units have a 64 bed capacity. Direct supervision is provided in all housing units. The facility also has a restrictive housing unit which contains 64 beds. However, the beds are not counted as part of the operational capacity.

Each general population housing unit has a dayroom area with tables, chairs, two televisions, seven telephones, board games, card games and a sufficient number of showers and wash basins. There is a small 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 also has a large recreation yard where detainees may engage in various exercise activities such as walking, jogging, basketball, volleyball and intramural games between housing units of appropriate custody designations. 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 restrictive housing unit, for administrative reasons, have access to recreation areas out of their cells for two hours per day, seven days a week, and those housed in disciplinary segregation status have access to the recreation areas one hour per day, seven days a week. Detainees are permitted to participate in the voluntary work program. The facility also offers a variety of educational and training classes to detainees.

In general, the team found the atmosphere in the facility to be calm with no obvious indicators of high stress. Facility staff was observed interacting with detainees; the interactions appeared to be professional and productive. Sanitation and cleanliness was observed to be above average.
Numerous ICE detainees, selected at random from all classification levels, were interviewed during the course of the inspection. Both male and female detainees, some with limited English proficiency, were interviewed. Some interviews were in a group forum and several were private and confidential. The detainees voiced no concerns regarding life/safety issues. In general, detainees were satisfied with living conditions and with the interaction and responsiveness of facility and ICE staff. Except for minor concerns about the amount of food provided, the detainees interviewed did not express any other concerns. The food service inspector confirmed that the food portions provided by food service are in compliance with the requirements of the standard.

The facility does not charge co-pays for medical, mental health or dental care.

Detainee telephone services are provided via the ICE contract with TALTON Communications.

**Areas of Concern/Significant Observations**

There were no areas of concern or significant observations identified during this inspection.

**Recommended Rating and Justification**

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards. The facility complies with the ICE Performance Based National Detention Standards (PBNDS-2011). No standards were found Does Not Meet Standards and one (1) standard was Not Applicable (N/A). All remaining forty-one (41) 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 at the facility and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- **ICE Officials** -

- **Facility Staff** -

  and various other facility employees.

, Lead Compliance Inspector January 17, 2019

Printed Name of LCI Date