



May 13, 2021

TO: [REDACTED]
Assistant Director Custody Management

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

SUBJECT: **Annual Inspection of the Northwest ICE Processing Center**

The Nakamoto Group, Inc. performed a hybrid annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 (Revised 2016) of the Northwest ICE Processing Center in Tacoma, Washington during the period of May 11-13, 2021. This is a CDF.

The annual inspection was performed under the guidance of [REDACTED] Lead Compliance Inspector. 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 PBNDS 2011 (Revised 2016) for Over 72-hour facilities. The facility received a rating of Meets Standards during the December 2020 annual inspection.

Inspection Summary

The Northwest ICE Processing Center 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) - 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 2020 and 2021 PBNDS 2011 annual inspections:

<i>2020 Annual Inspection</i>	
Meets Standards	41
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

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

The inspection team identified four (4) deficient components in the following three (3) standards:

Hold Rooms in Detention Facilities – 1, which is a Priority Component
Visitation – 2, both of which are Priority Components
Staff-Detainee Communication – 1

Facility Snapshot/Description

The Northwest ICE Processing Center is located on the tide flats of Port of Tacoma, thirty miles south of Seattle. The facility is owned and operated by The GEO Group, Inc. [REDACTED]

[REDACTED] The facility houses all custody levels. [REDACTED]

The facility was constructed in 2004. It is surrounded by one fourteen-foot chain link fence supplemented with razor ribbon on top and bottom and encircled by a gravel perimeter road that is patrolled by an armed officer in a vehicle each shift. Surveillance cameras offer visibility around the entire perimeter and into the interior movement corridors. All exterior building doors and interior security gates are under constant camera surveillance and controlled by central control staff. The facility is equipped with a 208-surveillance camera network that is monitored 24 hours a day.

The physical plant includes six general population housing units; four of the housing units contain three housing pods, and two of the units contain four housing pods. All housing units/pods are configured into either a dormitory setting or a two-tier cell design which contain one or two beds per cell. Capacities of the celled housing units/pods range from 205-278 beds. Dormitory capacities range from 64 to 80 beds. There is one special management unit (RHU) which contains twenty two-bed cells. During the inspection there were four detainees in the SMU; three in administrative segregation status and one in disciplinary segregation status. The facility has designated sections of different housing units/pods to serve as COVID-19 wings. All housing areas are managed by direct supervision. The facility is ADA accessible.



Each living area, except the SMU, has a common dayroom equipped with a television, fixed table/chair units for detainees to eat their meals, play games, and gather for conversation. Electronic tablets are available in each housing unit to receive/send emails; conduct video-visits; make telephone calls; send requests directly to facility and ICE/ERO staff; order commissary; file grievances; check their account balance; view the LexisNexis collection, the facility handbook and all announcements and program schedules; and access fee-based entertainment programs. Detainees are provided indoor and outdoor recreation.

No detainees volunteered to be interviewed by the inspection team. Detainees were asked in writing, both in English and Spanish, to volunteer. Inspectors toured the housing units, work areas and program services and informally interviewed eighteen detainees including seventeen from general population and one from the segregation unit. An interpreter was used for one of the interview with the detainee in disciplinary segregation. The detainee in segregation said “this was the best facility he has been housed”. He was familiar with the rules of the facility, knew his deportation officer and said his questions are always answered. He appreciates the medical care.

One detainee was interviewed in the intake area while waiting for a medical appointment. When asked about the availability and reliability of telephone services, the detainee stated that four telephones on his housing unit were inoperable. The compliance manager provided the work order that had been submitted on April 30, 2021. The telephone vendor, Talton, is waiting on parts. The ratio of telephones to detainees continues to be within standard guidelines.

Generally, all of the detainees were satisfied with conditions of confinement, availability of services, the cleanliness of the facility and their treatment by staff. All detainees were asked if they had filed a grievance or contacted the OIG. No detainee had contacted the OIG hotline.

Medical services are provided by ICE Health Service Corp. Food service and maintenance operations are provided by The GEO Group, Inc. employees. Detainee telephone and tablet services are provided by Talton Communications. ICE detainees are not charged medical co-pays. The cleanliness standards were above average.

Areas of Concern/Significant Observations

During this assessment, the facility demonstrated optimal levels of compliance as described in the following standards: Sexual Abuse and Assault Prevention and Intervention, Special Management Unit, Use of Force, Medical Care, Medical Care (Women), Significant Self-Harm and Suicide Prevention and Intervention, Recreation, Telephone Access, and Law Libraries and Legal Materials. Details of optimal achievements have been documented in component comments and/or overall remarks of the applicable standard.

Two inspectors worked remotely and were unable to personally observe practices and procedures within the facility. They relied upon photographs and/or videos to validate the observation of many standards. There were three priority components rated as Does Not Meet Standard:



Visitation

Component #5: General visitation is permitted during set hours on Saturdays, Sundays, and holidays, and, to the extent practicable, the facility also establishes visiting hours on weekdays and during evening hours. The facility accommodates the scheduling needs of visitors for whom scheduled visiting hours pose a hardship. The number of visitors a detainee receives and the length of visits are limited only by reasonable constraints of space, scheduling, staff availability, safety, security, and good order.

Finding: General visitation has been suspended since March 13, 2020 due to COVID-19 concerns. There is a video visitation option available on the computer tablets available to detainees in the housing units, but these are not free. Indigent detainees do not have access to general visitation. They have continued to provide legal visitation.

Recommendation: The facility should provide an opportunity for detainees to participate in general visitation without paying a fee.

Component #9: The facility's written rules shall specify time limits for visits. Visits should be for the maximum period practicable but not less than one hour with special consideration given to family circumstances and individuals who have traveled long distances.

Finding: General visitation has been suspended since March 13, 2020 due to COVID-19 concerns. There is a video visitation option available on the tablets in the housing units, but these are not free. Indigent detainees do not have access to general visitation. The facility has continued to provide legal visitation.

Recommendation: The facility should provide an opportunity for detainees to participate in general visitation without paying a fee.

Hold Rooms in Detention Facilities

Component #17: Officers closely supervise hold rooms through direct supervision to ensure visual monitoring at irregular intervals at least every fifteen minutes.

Finding: The logbook reflected checks that were longer than fifteen-minute intervals.

Recommendation: Ensure that fifteen-minute checks are consistently completed within the standard guidelines.

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 (Revised 2016) 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 be Meet Standards.



The Nakamoto Group, Inc.

LCI Assurance Statement

The findings of compliance and noncompliance are accurately and completely documented on the G-324A Inspection Form and are supported by documentation in the inspection file. An out brief was conducted at the facility, and in addition to the on-site and remote Nakamoto Group, Inc. Inspection Team, the following participated:

- ICE Officials – [REDACTED]
- IHSC [REDACTED]
- Facility Staff – [REDACTED]
- [REDACTED] - Detention & Deportation Office-HQTRS

[REDACTED] Lead Compliance Inspector
Printed Name of LCI

May 13, 2021
Date