October 3, 2019

TO: Assistant Director for Detention Management

FROM: Lead Compliance Inspector
The Nakamoto Group, Inc.

SUBJECT: Annual Detention Inspection of the Richwood Correctional Center

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2011) of the Richwood Correctional Center in Monroe, Louisiana during the period of October 1-3, 2019. This is an IGSA.

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

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<th>Subject Matter Field</th>
<th>Team Member</th>
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<tr>
<td>Security</td>
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<td>Detainee Rights</td>
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<td>Medical Care</td>
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<td>Safety</td>
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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 was not inspected in 2018.

Inspection Summary

The Richwood Correctional 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 2019 PBNDS 2011 compliance annual inspection:
The inspection team identified four (4) deficient components in the following four (4) standards:

- Hold Rooms in Detention Facilities – 1
- Staff-Detainee Communications – 1
- Food Service – 1
- Law Libraries and Legal Material – 1

**Facility Snapshot/Description**

The Richwood Correctional Center is located in Monroe, Louisiana. The indirect supervision facility is owned and operated by LaSalle Corrections under an IGSA in partnership with the City of Richwood, Louisiana. The facility holds male detainees for the Louisiana Department of Corrections (DOC) and ICE.

The general population housing units have a dayroom area with tables, chairs, televisions, microwave ovens, and a hot pot for heating water. Dayroom activities include board games, cards, leisure reading, and television. Outdoor recreational activities include basketball, soccer, handball, and walking. Correctional officers are responsible for the supervision of these activities and for distributing recreation materials daily. Detainees may participate in the voluntary work program.

Telephones are provided in the housing units and detainees have access to them during facility waking hours. Communication assistance such as bilingual staff and professional interpretation and translation services is provided to detainees with disabilities and detainees who are limited in their English proficiency (LEP). All written materials are provided to detainees in English and Spanish. The facility provides detainees with auxiliary aids as needed. The telephones are equipped with volume control handsets and a TTY machine is available.

The inspection team visited the housing units multiple times during the inspection and found the atmosphere to be calm. The facility began housing ICE detainees in April of 2019 and is in the process of training officers on the concepts of civil detention. All staff interviewed during the inspection were professional but some were not well-versed in the requirements of the standards. Interactions between facility staff and detainees were observed to be professional. ICE personnel were observed in the housing units meeting with detainees during the inspection. There are seven ICE officers assigned onsite at the facility.

Detainees were relaxed and approached the inspectors without hesitation. Detainees were interviewed in groups or in a private, confidential setting. LEP detainees speaking Spanish were interviewed using a telephonic translation line or by a bilingual inspector. A number of detainees complained about the food and some stated that they had been fed mainly rice and beans until recently. The menus were reviewed by the food service SME and no issues were noted in the diversity of food items. There were no concerns regarding the telephones, religious programs, law library, or their participation in in-dorm activities.
It was noted during a tour of housing Unit C that there was an outspoken Cuban detainee who was acting as the spokesman for several other detainees. During confidential interviews a common concern was that the Cuban detainees were trying to take over the housing unit controlling the microwave and television programming. They also kept telling the other detainees that they did not need to follow the facility rules. Many detainees felt intimidated. This was brought to the attention of facility staff.

A detainee complained that ICE officers never visit his housing unit and that they never respond to any requests. A review of the log that ICE officers sign when they visit the unit indicated that ICE officers were visiting several days each week. A review of the Detainee Request Log indicated that requests are responded to within one to two days.

Another concern was being exposed to some Hindu detainees that had not bathed since their arrival. Detainees were concerned that their clothing was being washed with everyone else’s and they felt they might be exposed to disease or that their clothes were not fully cleaned upon return from the laundry.

An inspection of the facility reflected average sanitation conditions being maintained. Housing units were observed to be generally clean and graffiti free but appeared cluttered with clothing and bed linens strewn about the bunk beds. Sinks and showers were observed to be in working condition providing hot and cold water as required. Showers were observed to be generally clean, mold and mildew free; but, in need of additional cleaning of the shower curtains and along the baseboards to remove soap scum. Sink and toilet areas were mold and mildew free. Several detainees expressed concern for the lack of privacy in the toilet and shower areas. Observation of these areas confirmed that the gang showers and toilets offered little or no privacy.

The current law library is located in a small room. There are four computers in the room and it was noted that if all computers were being used it would be crowded. Facility staff stated that this has not been a problem so far. During an interview with the law librarian it was noted that he did not seem to be well versed in the requirements of the standards. This was discussed with the OIC who stated that he was in the process of reassigning personnel in key areas. He also stated that the area that he had planned to use for an expanded law library was currently being used as office space for onsite ICE personnel. He is attempting to find other space.

Detainees are not charged co-pay fees for medical, dental, or mental health services. Medical care and food services are provided by LaSalle employees. Detainee telephone services are provided by Correct Solutions.

**Areas of Concern/Significant Observations**

There were no areas of concern or significant observations during the 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 (0) standards were found Does Not Meet Standards and two (2) standards were Not Applicable (N/A). All remaining forty (40) standards were found to be in compliance.
**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
- LaSalle Corporate Staff

[Redacted]

Lead Compliance Inspector

October 3, 2019

Printed Name of LCI

Date