

October 28, 2021

TO: [REDACTED]
Acting Assistant Director Custody Management

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

SUBJECT: **Annual Inspection of the Aurora ICE Processing Center Annex**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 of the Aurora ICE Processing Center Annex in Aurora, Colorado during the period of October 26-28, 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
Safety	[REDACTED]
Security	[REDACTED]
Medical Care	[REDACTED]
Detainee Rights	[REDACTED]
Medical Care	[REDACTED]

Type of Inspection

This is a scheduled annual inspection to determine overall compliance with the ICE PBNDS 2011 for Over 72-hour facilities. The facility received a rating of Meets Standards during the January 2021 annual inspection (postponed from 2020).

Inspection Summary

The Aurora ICE Processing Center Annex 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 January 2021 and October 2021 PBNDS annual inspections:



<i>January 2021 Annual Inspection</i>	
Meets Standards	37
Does Not Meet Standards	1
Repeat Finding	0
Not Applicable	5

<i>October 2021 Annual Inspection</i>	
Meets Standards	39
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	4

The inspection team identified six (6) deficient components in the following four (4) standards:

- Staff - Detainee Communication – 1
- Food Service – 1
- Disability Identification, Assessment and Accommodation – 3
- Visitation – 1, which was a repeat deficiency

Facility Snapshot/Description

The Aurora ICE Processing Center Unit Annex (Annex) is located in Aurora, Colorado which is approximately ten miles east of Denver. The facility opened in [REDACTED] and is owned and operated by The GEO Group, Inc., a private corrections company. The facility is connected with the Aurora ICE Processing Center (North Unit); together they comprise the entire compound. They are linked by an outside fenced corridor. During the first day of the inspection, the entire facility/compound housed [REDACTED] detainees which included [REDACTED]. There were [REDACTED] ICE detainees assigned to the South Unit (Annex). All female ICE detainees are housed in the Annex.

The facility was built in [REDACTED]. The entire compound consists of two one-story buildings which are separated into two distinct sections: the Aurora ICE Processing Center (North Unit) and the Annex (South Unit). Most of the Annex support services are shared with the North Unit. Travel between the two buildings is frequent. The compound’s exterior perimeter combines the outside walls of the buildings, intermittent runs of twelve-foot chain link fence sections which are supplemented with razor ribbon and a motion detection (shaker fence) system, and twelve-foot block walls around the recreation yards. There is a perimeter road around the compound that is continuously patrolled by two unarmed officers in separate vehicles. Surveillance cameras offer visibility around the entire perimeter, into the recreation areas, and down the interior movement corridors. All exterior building doors and interior security gates and doors are under constant camera surveillance and controlled by central control staff. The compound is equipped with a 261 surveillance camera network that is monitored 24 hours a day. All movement is escorted.

There are thirteen individual housing units in the Annex which are either dormitory settings ranging in size from [REDACTED]. There is one special management unit (SMU) in the Annex that contains [REDACTED]; it is currently used to house segregation status female detainees only. Male detainees worthy of segregation status are escorted to and housed in the North Unit SMU. There were no detainees in the Annex SMU during the inspection. The facility has dedicated sections of its housing units, North Unit and the Annex, to serve as COVID-19 wings. There were thirty active COVID-19 patients quarantined for treatment and observation during the inspection. The Annex is maintaining an above average level of sanitation and cleanliness.



The Annex housing units are supervised by direct and indirect supervision models. Each general population housing unit has a common dayroom which is equipped with: two televisions; fixed table/chair units for detainees to eat their meals, play games and gather for conversation; a bank of wall-mounted telephones; tablets on which detainees can receive/send emails, conduct video visits, make telephone calls, send requests directly to facility and ICE/ERO staff, order commissary, file non-medical grievances, check account balances, view the LexisNexis collection, access the handbooks and all announcements/schedules, and participate in fee-based entertainment programming. Each detainee is assigned a lockable personal property storage bin. All detainees are provided daily indoor and outdoor recreation.

Optimal levels of compliance are present in the following standards: Special Management Units, outdoor recreation is provided at least two hours a day, seven days a week for administrative segregation status detainees, and at least one hour a day, seven days a week for disciplinary segregation detainees; Medical Care, the facility is NCCHC accredited, and adequate space and staffing are available for tele-health systems; Medical Care Women, the facility and its clinics are NCCHC accredited; Significant Self-Harm and Suicide Prevention and Intervention, the facility and its prevention, treatment and therapeutic aftercare for suicidal or at risk detainees for self-harm are NCCHC accredited; Terminal Illness, Advance Directives and Death, the facility and its medical care for terminally ill detainees are NCCHC accredited; Use of Force, audio visual records are retained for one year after conclusion of investigation or litigation; Recreation, detainees are provided wireless headsets for television viewing; Telephone Access, the telephone ratio is one telephone for every ten detainees; and Law Libraries and Legal Materials, access is more than fifteen hours per week.

All officers and medical staff carry a radio. The facility does not currently offer on-site visitation due to COVID-19 conditions, except for legal visits. Only a remote video-visit format is permissible for general visitation. It is a fee based system. No accommodations have been established to permit all detainees the opportunity to participate in general visitation at no charge.

Inspectors interviewed 36 general population detainees; some required the use of a language line. Overall detainees were satisfied with the food, their medical treatment, recreational opportunities, the cleanliness of the facility, law library access, mail deliveries, commissary privileges, law library services, and access to and response from ICE/ERO personnel. All of the detainees stated they did receive a facility handbook during in-processing.

There were five detainees who registered slight medical care concerns. All of these were discussed with the health services administrator by the medical SME. All of the detainees had been previously seen/treated for their complaint and those in need of further care were already scheduled for follow-up appointments. No further action was necessary. Overall, the detainees were very content with their living conditions, their safety and treatment, the cleanliness of the facility, the food, medical care, and responsiveness from facility and ICE/ERO staff. All detainees interviewed were asked if they had filed a grievance and/or contacted the Office of Inspector General. If they replied in the negative, they were informed of the grievance process and the availability of the OIG.

There were no deaths, suicide attempts, escapes, hunger strikes or calculated uses of force reported during this inspection period.

Medical, food service and maintenance services are provided by The GEO Group, Inc. employees. Detainee telephone and tablet services are managed by Talton Communications. ICE detainees are not charged medical co-pays.



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Areas of Concern/Significant Observations

This was a hybrid inspection in which some of the inspectors worked remotely. Remote inspectors were unable to personally observe practices and procedures within the facility and relied upon photographs and/or videos to validate the observation of many standards. There were no areas of concern or significant observations noted during the inspection

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 for Over 72-hour facilities. No (0) standards were rated as Does Not Meet Standard and four (4) standards were Not Applicable (N/A). All remaining thirty-nine (39) standards were found to Meet Standards.

LCI Assurance Statement

The findings 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. In addition to the entire Nakamoto Group, Inc. Inspection Team (some telephonically) the following were present:

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

[REDACTED] Lead Compliance Inspector

Printed Name of LCI

October 28, 2021

Date