



The Nakamoto Group, Inc.

July 1, 2021

TO: [REDACTED]
Assistant Director Custody Management

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

SUBJECT: **Annual Inspection of the Bluebonnet Detention Center**

The Nakamoto Group, Inc. performed an annual hybrid inspection for compliance with the ICE Performance Based National Detention Standards (PBNDS 2011 with 2016 revisions) of the Bluebonnet Detention Center in Anson, Texas during the period of June 29-July 1, 2021. This is a DIGSA facility.

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 hybrid inspection which is performed to determine overall compliance with the ICE PBNDS 2011 with 2016 revisions for Over 72-hour facilities. The facility received a previous rating of Meets Standards during the October 2020 inspection.

Inspection Summary

The Bluebonnet Detention 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) - 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 90-day follow up inspection and the 2021 compliance inspection:

<i>2020 Annual Inspection</i>	
Meets Standard	41
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	1

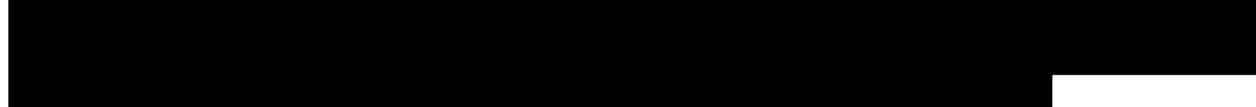
<i>2021 Annual Inspection</i>	
Meets Standard	41
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	2

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

- Staff-Detainee Communication – 2
- Food Service - 1
- Correspondence and Other Mail—1
- Visitation – 2, both of which are priority components

Facility Snapshot/Description

The Bluebonnet Detention Center is located in a rural area of Anson, Texas. The facility is owned by Jones County, Texas and operated by Management & Training Corporation (MTC).



Detainees are housed in dormitories with various capacities including 28, 56, 60, 72 and 82 beds. The special management unit (SMU) for males consists of 26 beds. Five detainees were housed in the SMU during the inspection; three were housed in administrative segregation and two were housed in disciplinary segregation. There is one detention cell available for the segregation of female detainees, if needed. Each dormitory dayroom area is equipped with televisions, telephones, various games, and two microwave ovens. Additionally, detainees may request issuance of a tablet on which they may, for a fee, listen to music, play games, send messages, and have video visits with family or friends. For no fee, the tablets facilitate electronic request forms to staff, sick call requests, video relay services for deaf detainees, composition and transmission of grievances, play free games, and order commissary. The local handbook is also programmed on the tablets. Outdoor recreation yards are available to detainees daily on a published schedule.

The facility achieves optimum compliance with standards to include: issuance of headsets that permit detainees to listen to the television of their choice in the dormitories; recreation opportunities for detainees in disciplinary segregation; the required presence of medical personnel during transgender strip searches; adequate space and staff for telemedicine; providing telephones at a ratio of one telephone per every ten detainees; the availability of the video relay system for deaf detainees; and law library is available no less than fifteen hours per week.

Pursuant to COVID-19 protocols, ICE suspended on-site general/social visitation at all ICE facilities in March 2020. Legal and professional visitation are exempt from this suspension. To mitigate the impact of





the visitation suspension, ICE provides each detainee at the facility with fifteen, ten-minute telephone calls each week.

Fifteen formal interviews were completed with detainees who volunteered to speak to the inspection team. Thirty-seven additional detainees were interviewed informally in two female housing units, two male housing units and the intake area during release. Interviews with detainees with limited English proficiency were conducted by the bilingual inspector and use of the Language Line, a telephonic interpreter service. No detainees expressed any concerns related to their physical safety or conditions of confinement. All of the detainees expressed satisfaction with the quality and quantity of the food provided to them. No detainee called the OIG number. The detainees in the special management unit voiced no issues. The detainees exiting the facility stated that “there were no issues with food service, medical services, or communication with facility staff or ICE staff.”

Two detainees were interviewed confidentially. One detainee uses a walker for assistance and would like a new one with four wheels. Also, he indicated his medication was discontinued. The medical SME conducted a follow-up and stated the detainee has two appointments scheduled for July 3 and 10, 2021. Both issues are to be addressed at that time.

One detainee stated he was told that all outside recreation was going to be cancelled this summer due to the heat. The recreation SME conducted a follow-up and determined this is not true and staff has never communicated this directive. However, when the temperature reaches 110 degrees, outdoor recreation will be black flagged for that time period and indoor recreation will be offered.

Three detainees were interviewed confidentially by the medical SME. One detainee complained that detainees that were with him during intake knew his file information. He complained about officers being very strict and about commissary prices. The OIC confirmed that he will look into the cases. On-site observation of the intake screening area verified exam rooms are close but privacy is maintained by closing the door. The second detainee complained that his dental appointments were postponed several times. The HSA scheduled the detainee's appointment and will escort him to the dentist. Another detainee looked depressed after a call. After a voluntary interview, mental health staff were informed and an appointment was scheduled. The detainee refused the appointment. Another appointment was scheduled during the next two days.

Two detainees were informally interviewed and expressed they had suffered from headaches and cramps. The detainees stated they were not seen by medical staff in a timely manner. The medical SME provided follow-up and discovered both detainees were seen several times by medical staff and did not express these concerns during their visits.

The facility does not charge co-pays for medical, mental health, or dental care. Medical care and food services are provided by MTC. Detainee telephone services are provided via the ICE national telephone contract with Talton Communications, Inc.

Areas of Concern/Significant Observations

There were no areas of concern or significant observation noted during the inspection. The inspection was conducted with four inspectors on-site and one inspector working remotely. The inspector working remotely was unable to personally observe practices and procedures within the facility. The inspector relied upon photographs and/or videos to validate the observation of many standards. Additionally, interviews were conducted with multiple key staff members.



Two priority components were found Does Not Meet Standard:

Visitation

Priority 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 was suspended by ICE in March 2020 due to the COVID-19 pandemic. Per the OIC and substantiated by a review of policy and procedures, prior to the imposition of the suspension, the facility met the requirements of the standard. Detainees continue to have access to social visits, seven days per week, via the electronic tablets located in each housing unit. However, these visits are all fee based. Detainees do not have a no-fee option available for social visits in order to meet the basic requirements of the standard. The telephone vendor is providing detainees with fifteen, ten-minute free telephone calls each week to mitigate the impact of the suspension. Per the OIC, whenever ICE authorizes on-site general visitation to resume, visitation will be permitted seven days per week, including Saturdays, Sundays and holidays, and will be limited only by reasonable constraints of space, scheduling, staff availability, safety, security, and good order as required by the component.

Recommendation: Provide visitation as required by the standard.

Priority 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 was suspended by ICE in March 2020 due to the COVID-19 pandemic. Per the OIC and substantiated by a review of policy, prior to the imposition of the suspension the facility met the requirements of the standard. Detainees continue to have access to social visits, seven days per week, with no time constraints, via the electronic tablets located in each housing unit. However, these visits are all fee based. Detainees do not have a no-fee option available for social visits to meet the basic requirements of the standard. The telephone vendor is providing detainees with thirteen, ten-minute free telephone calls each week to mitigate the impact of the suspension. Per the OIC and the compliance administrator, whenever ICE authorizes on-site general visitation to resume, visitation will be permitted seven days per week, including Saturdays, Sundays and holidays, and will permit on-site visits of no-less than one hour with special consideration given to family circumstances and individuals who have traveled long distances.

Recommendation: Provide visitation as required by the standard.

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). No (0) standards were found Does Not Meet Standard and two (2) standards were 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. In addition to the entire Nakamoto Group, Inc. Inspection Team, the following facility and ICE/ERO field office personnel participated:

- ICE Officials - [REDACTED]

- Facility Staff - [REDACTED]

[REDACTED] Lead Compliance Inspector July 1, 2021
Printed Name of LCI Date