



The Nakamoto Group, Inc.

October 7, 2021

TO: [REDACTED]
Acting Assistant Director Custody Management

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

SUBJECT: **Annual Inspection of the El Valle Detention Facility**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance Based National Detention Standards (PBNDS 2011) of the El Valle Detention Facility in Raymondville, Texas during the period of October 5-7, 2021. This is an IGSA.

The 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 for Over 72 hour facilities. The facility received a rating of Meets Standards during the December 2020 inspection.

Inspection Summary

The El Valle 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 2020 and 2021 compliance annual inspections:



<i>2020 Annual Inspection</i>	
Meets Standards	40
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	3

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

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

Disciplinary System – 1

Hunger Strikes – 1

Significant Self-Harm and Suicide Prevention and Intervention – 1

Facility Snapshot/Description

The El Valle Detention Facility is located in Raymondville, Texas. The facility is owned and operated by Management and Training Corporation (MTC). During the inspection the facility is housing male and female ICE detainees of all classification levels. Detainees are classified by facility staff using the information provided by ICE. [REDACTED]

The [REDACTED] facility is located on a 55-acre compound consisting of two distinct sections inside the fence: the administrative services area and a section that includes the detainee housing units, kitchen/dining halls, and the receiving and discharge area. The space between these areas is dedicated to two large outdoor recreation yards. The perimeter of the compound is encircled by a paved road and two parallel twelve-foot chain link fences supplemented with razor ribbon. The exterior fence line is equipped with an intrusion/shaker detection system. The perimeter fence is checked once each shift by a designated officer and is under constant surveillance via camera which is monitored by control center officers. The 226-camera network affords watch into all housing units and main movement corridors. General population detainees are housed in open dormitories under direct supervision by an officer. All movement is either escorted or permitted by sight line observations from post officers. All exterior building doors are alarmed and controlled by central control officers. The housing units are furnished with fixed dining/seating tables where detainees can play board games, cards, and engage in social interactions with one another. The units are equipped with televisions, a microwave, video games, and various board games and puzzles. An optimal number of telephones are also provided along with electronic tablets which may also be used for video calls.

Several housing units were on cohort status during the inspection due to the detainees being under various stages of quarantine for COVID-19. There were thirteen detainees who had tested positive for COVID-19.

A total of ten detainees were interviewed in a confidential setting. None of the detainees voiced any concerns regarding their treatment or care by facility staff. There were no complaints regarding food service or medical care, and all felt safe at the facility. Detainees were aware of the law library, but none reported using it. Detainees stated that LexisNexis is also available on the tablets. Detainees are permitted an optimal fifteen hours per week in the law library. Detainees reported that ICE personnel visit the housing units often and respond to their requests. One detainee stated that there was a detention officer who was very rude. This complaint was reported to the lieutenant who then spoke to the detainee regarding the



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complaint. The detainee had not filed a grievance nor contacted the Office of Inspector General (OIG); he was instructed on how to reach the OIG.

There was one death reported during this inspection period. A female detainee was brought to the facility by Border Patrol on 07/27/2021. She was in the facility for approximately five hours. She was assessed by medical staff during the medical intake screening process and found to have signs and symptoms of COVID-19, shortness of breath, and low O2 saturation. The nurse practitioner on call was notified and the detainee was sent to Valley Baptist Medical Center for further evaluation. The detainee was admitted to Valley Baptist Medical Center on 07/28/2021 for COVID-19 pneumonia and passed away from COVID-19 related complications on 08/03/2021.

A total of fifty staff interviews were conducted; 119 medical files and nineteen detention files were reviewed by inspectors during the inspection. Inspectors noted that facility practices meet optimal compliance in the following eight standards: 2.1 Admission and Release, 4.3 Medical Care, 4.4 Medical Care (Women), 4.6 Significant Self-Harm and Suicide Prevention and Intervention, 4.7 Terminal Illness, Advance Directives and Death, 5.4 Recreation, 5.6 Telephone Access, and 6.3 Law Libraries and Legal Materials.

Food Service and medical services are provided by MTC employees. Detainee telephone services and electronic tablets are provided by Talton Communication. Detainees are not charged co-pay fees for medical, dental, or mental health services. Sanitation throughout the facility was good with the exception of the shower areas where mold was noted in the caulking. Facility staff stated that maintenance staff were in the process of replacing the caulking in these areas.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations from this inspection. This inspection was conducted as a hybrid with two inspectors working remotely. The remote inspectors were unable to personally observe practices and procedures within the facility and relied upon telephonic interviews, documentation provided by the facility, and on-site inspector observation.

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) for Over 72 hour facilities unless unobserved practices and conditions are contrary to what was reported to the inspectors working remotely. No (0) standards were rated 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 with the facility. In addition to the on-site Nakamoto Group Inspection Team and two inspectors working remotely, the following participated:

- ICE Officials – [REDACTED]



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- Facility Staff – [Redacted]

[Redacted]
Lead Compliance Inspector
Printed Name of LCI

October 7, 2021
Date