



The Nakamoto Group, Inc.

December 17, 2021

TO: [REDACTED]
Acting Assistant Director Custody Management

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

SUBJECT: **Annual Inspection of the Montgomery Processing Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2011) of the Montgomery Processing Center in Conroe, Texas during the period of December 14-17, 2021. This a CDF facility.

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 an annual inspection which was performed to determine overall compliance with the ICE PBNDS 2011 for Over 72-hour facilities. The facility received a previous rating of Meets Standards during the December 2020 inspection.

Inspection Summary

The Montgomery Processing Center is currently accredited by:

- The American Correctional Association (ACA) –Yes
- 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 and 2021 annual inspections:



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

<i>2021 Annual Inspection</i>	
Meets Standards	40
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	3

The inspection team identified one (1) deficient component in the following one (1) standard:

Significant Self-Harm and Suicide Prevention and Intervention – 1

Facility Snapshot/Description

The Montgomery Processing Center, a contract detention facility (CDF) owned by The GEO Group, Inc., is located in an industrial area of northeast Conroe, Texas. The facility operates pursuant to a contract with ICE and houses adult male and female ICE detainees of all classification levels. ICE maintains an on-site presence in the facility. There are several law enforcement/corrections entities nearby including the Montgomery County Sheriff's Office and county jail, the Joe Corley Detention Facility, the Texas Department of Public Safety, and the Montgomery County Mental Health Facility. The current operational capacity is 1,444 beds. [REDACTED]

The facility is a single two-story building with the secure perimeter surrounded by an outer twelve-foot Jbar chain link fence and an inner eight-foot chain link fence which is supplemented by razor ribbon at the top and bottom. The entire perimeter is under camera surveillance and is continuously monitored by central control officers. There is a paved road that encircles the entire compound which is patrolled 24 hours a day by armed officers. All exterior door egress is controlled by central control officers. The facility has 535 surveillance cameras. The housing units and all support departments are accessible off one long main corridor. All detainee movement outside of the housing units is escorted.

The facility has both dormitory and cell design housing for general population. There are two special management units (SMU); one for males and one for females. All housing units are under 24-hour direct supervision of at least one officer. General population housing units have an adjacent outdoor recreation area to which detainees have continuous access during daylight hours. There are three large soccer fields/yards which are available to all general population housing units on a rotating schedule.

The housing units provide a dayroom equipped with two televisions, telephones, various table-top board games, and two microwave ovens. The general population housing units have two computer kiosks equipped with LexisNexis in the "quiet room". Detainees have access to the kiosks during facility waking hours in addition to their five hours per week access to the law library. Electronic tablets are provided in each housing unit which allow detainees to submit requests to facility and ICE staff, place commissary orders, and review both the local site-specific handbook and the ICE National Detainee Handbook. For a fee, detainees may also watch movies, play games, text with family and friends, and have video visits. Vending machines are available in the housing units.



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The facility staff was professional in appearance and demeanor, and those interviewed possessed a working knowledge of the standards as they applied to their duties. The atmosphere of the facility appeared relaxed, and staff and detainee interactions were cordial and professional.

The inspection team formally interviewed a total of 26 detainees. During this process, non-English speaking detainees were interviewed by Spanish speaking SMEs and by utilizing the telephonic translation line. The inspection team conducted numerous informal interviews of detainees while visiting the general population housing units.

All detainees stated that they felt safe in the facility and were able to access programs and services. Detainees were asked about the quality of the food, and responses were generally favorable. Several detainees stated that they were having problems obtaining medical treatment. Each of these concerns was discussed with the medical staff, and medical records were reviewed by the medical SME. It was determined that each detainee was receiving appropriate and timely medical services. Two detainees stated that they had not received a facility handbook; however, after checking documentation in detainee files it was determined that they had signed a form indicating that they had received the handbook. Several detainees expressed concerns about responses to grievances. Due to COVID-19, a change in submitting grievances was put in place. This was discussed with the facility administrator who stated that the process would be revisited to make the process more efficient. All detainees interviewed were asked if they were aware of the grievance process and the availability of the OIG; however, none had contacted the OIG.

The facility is climate controlled and appeared to be in good repair. The sanitation level of the facility was observed to be maintained at an outstanding level.

Medical care is provided by IHSC. Detainees are not charged a co-pay for any health services. Commissary is contracted to Keefe Commissary Network. All other services are provided by The GEO Group, Inc.

Areas of Concern/Significant Observations

This was a hybrid inspection with two inspectors working remotely. Three inspectors were on-site. The remote inspectors (Detainee Rights and Medical QMC SMEs) were unable to personally observe practices and procedures within the facility but were able to review files and documentation.

The facility achieves optimal compliance with a number of standard requirements including meeting standards in medical care for adequate space and staffing for the use of ICE Tele-Health systems, namely tele-psychiatry which is provided as needed; in telephone access by providing specialized video equipment for deaf/hard of hearing detainees; in law library and legal material by providing detainees a minimum of fifteen hours per week of access to the law library; and in recreation by providing detainees in the SMU for administrative reasons at least two hours of recreation or exercise opportunities seven days a week, and by providing detainees in the SMU for disciplinary reasons at least one hour of recreation or exercise opportunities seven days a week.

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) stand-

