February 3, 2022

TO: [Redacted]
Acting Assistant Director Custody Management

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

SUBJECT: Technical Assessment Review of the Okmulgee County Criminal Justice Authority (Moore)

The Nakamoto Group, Inc. performed a Technical Assessment Review (TAR) for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 of the Okmulgee County Criminal Justice Authority (Moore) in Okmulgee, Oklahoma, during the period of February 1-3, 2022. This is an IGSA facility.

The Technical Assessment Review (TAR) was performed under the guidance of [Redacted] Lead Compliance Inspector. Team members were:

<table>
<thead>
<tr>
<th>Subject Matter Field</th>
<th>Team Member</th>
</tr>
</thead>
<tbody>
<tr>
<td>Detainee Rights</td>
<td>[Redacted]</td>
</tr>
<tr>
<td>Security</td>
<td>[Redacted]</td>
</tr>
<tr>
<td>Medical Care</td>
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<tr>
<td>Medical Care</td>
<td>[Redacted]</td>
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<tr>
<td>Safety</td>
<td>[Redacted]</td>
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</tbody>
</table>

Type of Inspection

This is a scheduled Technical Assessment Review (TAR) which is performed to assess overall compliance with the ICE PBNDS 2011 for Over 72-hour facilities. The facility received a rating of Does Not Meet Standards during the October 2021 annual inspection.

Inspection Summary

The Okmulgee County Criminal Justice Authority (Moore) 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) - 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 October 2021 annual inspection and 2022 technical assessment review:
### 2021 Annual Inspection

<table>
<thead>
<tr>
<th>Category</th>
<th>Count</th>
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<tbody>
<tr>
<td>Meets Standards</td>
<td>36</td>
</tr>
<tr>
<td>Does Not Meet Standards</td>
<td>4</td>
</tr>
<tr>
<td>Repeat Findings</td>
<td>0</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>3</td>
</tr>
</tbody>
</table>

### Facility Snapshot/Description

The Okmulgee County Criminal Justice Authority (OCCJA) in Okmulgee, Oklahoma is owned by Okmulgee County Building Trust Authority and operated under the jurisdiction of the Okmulgee County Criminal Justice Authority. The facility is located approximately forty miles south of Tulsa, Oklahoma. The facility has a total capacity of [redacted] beds housing all custody levels of adult male ICE detainees and male U.S. Marshals Service detainees.

The OCCJA physical plant includes a two-story building operated under the indirect supervision model. Housing pods separate the detainees into compatible classification levels. Living units are well lit with both natural and artificial light and have adequate open space for detainees. The living areas are furnished with tables and chairs for detainees to participate in leisure time activities and socializing. Board games, leisure reading material, playing cards, and televisions are available. Five electronic kiosks are available in the ICE housing unit. Kiosks may be used to access detainee handbooks, text and video visitation for a fee, law library, commissary and submitting electronic requests to ICE officials and facility staff. Detainees have daily access to the outdoor recreation yard to jog and walk with other detainees housed in their living unit.

General visitation has been suspended since March 2020 due to health concerns associated with the COVID-19 virus. During the TAR, the compliance manager and ICE officials initiated the Phased Plan to Return to Social Visitation. There is currently one dormitory housing medium to high custody ICE detainees. A dedicated special management unit containing eleven cells with two-person occupancy and two medical cells are also available for additional housing.

During the inspection, seven detainees were housed together in quarantine status due to COVID-19 protocols. One detainee tested positive for COVID-19 and was housed alone in the medical unit. Five detainees were informally interviewed including the detainee housed in a single cell. Detainees expressed no concerns regarding conditions of confinement, medical services, food services, telephone services or access to facility or ICE officials. No detainee used the OIG hotline.

The facility is climate controlled. Housing unit officers were not able to answer questions regarding translation services available, law library access, and/or sanitation policies. The sanitation level of the facility was observed overall as unsatisfactory. The medical unit, intake unit, and sallyport were observed cluttered with excess paper and overflowing trash containers. Graffiti was observed in the recreation area, housing units, and common areas.

The overall sanitation in the detainee’s housing unit is average. The sanitation level was observed from the housing unit window and control center because the housing unit was on quarantine status.
The sanitation level in the non-ICE detainee housing units was observed as unsatisfactory. Sheets and other items were observed hanging from bunk beds. Trash was observed littered on the floors and the walls were dirty. The sanitation level at this facility was found to be adequate in the laundry area, property room, hallways, and administrative areas. Sanitation was observed to be well below average in the intake area, outdoor recreation, and the food service area. The facility has agreed to improve inspection and sanitation efforts throughout the facility.

Food service and medical service employees are Okmulgee County employees. The facility does not charge co-pays for medical, mental health, or dental care. Detainee telephone services are provided by Encartele via contract with the facility.

Areas of Concern/Significant Observations

This inspection was conducted as a hybrid. Four inspectors conducted the inspection on-site. The remote Medical QMC inspector was unable to personally observe practices and procedures within the facility but was able to interview staff and review files.

Recommended Rating and Justification

The facility is capable of receiving an overall rating of Meets Standards in a future inspection provided they continue the corrected practices and follow through with the action plans to which they committed. This Technical Assessment Review (TAR) does not include ratings.

LCI Assurance Statement

Compliance and non-compliance narratives 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 via conference call/on-site with facility staff and ICE representatives. In addition to the entire Nakamoto Group, Inc. Inspection Team, the following participated:

- ICE Officials –
- Facility Staff –

[Signature] Lead Compliance Inspector February 3, 2022

Printed Name of LCI Date