



The Nakamoto Group, Inc.

June 17, 2021

TO: [REDACTED]
Assistant Director Custody Management

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

SUBJECT: **Special/Technical Assessment Review of the Pulaski County Detention Center**

The Nakamoto Group, Inc. performed a special/technical assessment review for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2011) of the Pulaski County Detention Center in Ullin, Illinois during the period of June 15-17, 2021. This is an IGSA.

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 Q	[REDACTED]

Type of Inspection

This is a scheduled special/technical assessment review performed to determine overall compliance with the ICE PBNDS 2011 for Over 72-hour facilities. The facility received a rating of Does Not Meet Standards during the March 2021 annual inspection.

Inspection Summary

The Pulaski County Detention Center is currently accredited by:

- The American Correctional Association (ACA) - No
- 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 March 2021 annual inspection and June 2021 special/technical assessment review:



<i>March 2021 Annual Inspection</i>	
Meets Standards	40
Does Not Meet Standards	1
Repeat Finding	0
Not Applicable	2

Facility Snapshot/Description

The Pulaski County Detention Center is operated under the jurisdiction of the Pulaski County Sheriff's Office. The facility is located in the southern tip of Illinois approximately thirty miles north of Paducah, Kentucky. [REDACTED]

[REDACTED] The facility houses all classification levels of male ICE detainees but only high custody levels of female ICE detainees. The remaining population is comprised of Pulaski and surrounding county inmates and U.S. Marshal Service detainees. [REDACTED]

The facility was built in 1997. It is a stand-alone single story building. The exterior walls of the building and two twelve-foot chain link fencing sections around the outdoor recreation yards serve as the complete secure perimeter. The fence lines are supplemented with razor ribbon on top; there are no detection system on the fencing lines. The facility is encircled by a perimeter road that is irregularly patrolled by an armed officer in a vehicle when detainees are using the outdoor recreation yard, and an unarmed officer at all other times. Surveillance cameras offer visibility around the entire perimeter, into the housing units, the common areas, and interior movement corridors. All exterior building doors are controlled by central control staff and are under constant camera surveillance. The facility is equipped with a surveillance camera network that is monitored 24 hours a day.

There are eight individual general population housing units of which two are currently dedicated for ICE detainees. All housing units are either a dormitory design ranging in size from fifty to 56 beds or a two-tier cell block configuration each with six two-bed cells upstairs and six two-bed cells downstairs. There is one special management unit (SMU) for housing male administrative and disciplinary segregation status detainees; it contains eight two-bed cells. Female SMU detainees are sheltered in place inside their assigned housing unit. There were no ICE detainees housed in the SMU during this inspection. The health care unit has two separate negative air pressure observation rooms; each with one bed. Sections of some of the housing units are currently used as COVID-19 quarantine/isolation wings. The population and demand for these beds changes daily. There were three active COVID-19 cases in the facility during this inspection.

Each general population living area has a common dayroom which is equipped with a television, fixed table/chair units for detainees to eat their meals, play games, and gather for conversation. There are two video-visit stations in each housing unit. There are no tablets or kiosks. Weekly commissary orders are placed on the housing units' telephones. Housing unit telephones are provided at the optimum level of at least one telephone for every ten detainees. The facility handbook and all announcements, schedules and information bulletins are posted in the housing units. Detainees are provided daily indoor and outdoor recreation.

Medical services are provided by VitalCore Health Strategies and county employees. Food service and maintenance services are Pulaski County employees. Detainee telephone are provided by NCIC Inmate



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Calling Solutions. Video-visit stations are managed by HomeWAV. ICE detainees are not charged medical co-pays.

Areas of Concern/Significant Observations

This was a hybrid inspection in which some 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.

The facility is providing the following optimal levels of service as described in the standards: 2.1 – Admission and Release, when a strip search of a transgender detainee is conducted it will be observed by medical staff; 2.12 – Special Management Units (SMU), detainees in the SMU in disciplinary segregation status receive a daily recreation period of one hour per day, and SMU administrative segregation status detainees receive two hours of daily recreation per day; 2.15 – Use of Force and Restraints, use of force audiovisual records are retained by the facility for at least one year after litigation or any investigation has concluded or been resolved; 4.3 – Medical Care, the facility is NCCHC accredited; 4.4 – Medical Care (Women), the facility is NCCHS accredited; 4.6 – Significant Self-Harm and Suicide Prevention and Intervention, the facility is NCCHC accredited; 4.7 – Terminal Illness, Advance Directives and Death, the facility is NCCHC accredited; 5.4 - Recreation, SMU detainees in administrative segregation status are provided outdoor recreation daily for two hours, and SMU detainees in disciplinary segregation status are provided outdoor recreation daily for one hour; 5.6 - Telephone Access, the housing units are providing telephones at a ratio of one phone for every ten detainees; and 6.3 - Law Libraries and Legal Materials, detainees are provided law library access hours for more than fifteen hours per week.

Recommended Rating and Justification

The facility is capable of receiving an overall rating of Meets Standards in a future inspection providing they continue with corrected practices and follow through with the changes to which they have committed.

LCI Assurance Statement

The findings of compliance and non-compliance 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 and in addition to the entire Nakamoto Group, Inc. Inspection Team (one SME via conference call) the following were present:

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

[REDACTED] Lead Compliance Inspector

June 17, 2021

Printed Name of LCI

Date