

Date: October 30, 2020

To: [REDACTED], Chief, JFRMU

From: [REDACTED], Compliance Inspector
DLH Danya

Re: Compliance Inspection of the South Texas Family Residential Center.

From October 5, 2020 to October 26, 2020, I conducted a monthly inspection at the South Texas Family Residential Center. The following activities were conducted, and findings noted:

Standard	Type of Inspection	Finding
1.1 Emergency Plans	Monthly	Compliant
1.2 Environmental Health and Safety	Monthly	Noncompliant
1.3 Transportation by Land	Monthly	Compliant
1.4 Housekeeping and Voluntary Work Program	Monthly	Compliant
2.1 Admissions and Release	Monthly	Compliant
2.2 Contraband	Monthly	Compliant
2.3 Funds and Personal Property	Monthly	Compliant
2.4 Key and Lock Control	Monthly	Compliant
2.5 Resident Census	Monthly	Compliant
2.6 Searches of Residents	Monthly	Compliant
2.7 Sexual Abuse and Assault Prevention and Intervention	Monthly	Compliant
2.8 Staff-Resident Communications	Monthly	Compliant
2.9 Tool Control	Monthly	Compliant
2.10 Use of Physical Control Measures and Restraints	Monthly	Compliant
3.1 Discipline and Behavior Management	Monthly	Compliant
4.1 Food Services	Monthly	Compliant
4.2 Hunger Strikes	Monthly	Compliant
4.3 Medical Care	Monthly	Compliant
4.4 Personal Hygiene	Monthly	Compliant
4.5 Suicide Prevention and Intervention	Monthly	Compliant
4.6 Terminal Illness, Advance Directives and Death	Monthly	Compliant
5.1 Correspondence and Other Mail	Monthly	Compliant
5.2 Educational Policy	Monthly	Compliant
5.3 Escorted Trips for Non-Medical Emergencies	Monthly	Compliant
5.4 Marriage Requests	Monthly	Compliant
5.5 Recreation	Monthly	Compliant
5.6 Religious Practices	Monthly	Compliant
5.7 Telephone Access	Monthly	Compliant
5.8 Visitation	Monthly	Compliant
6.1 Grievance System	Monthly	Compliant
6.2 Law Libraries and Legal Materials	Monthly	Compliant
6.3 Legal Rights Group Presentations	Monthly	Compliant
7.1 Residential Files	Monthly	Compliant
7.2 News Media Interviews and Tours	Monthly	Compliant
7.3 Staff Hiring and Training	Monthly	Compliant
7.4 Transfer of Residents	Monthly	Compliant
7.5 Post Orders	Monthly	Noncompliant

Overall Observations

- Total population on the first day of inspection: 105
- Total number of adult females: 48
- Total number of juvenile males: 27
- Total number of juvenile females: 30
- Total number of school age children: 48
- Average length of stay: 258 days
- Longest stay: 426 days
- Total number of discharges from August 16, 2020 – October 5: 116
- Total number of intakes from August 16, 2020 – October 5, 2020: 79

Current Inspection Findings

I. Areas of Noncompliance

The following areas of noncompliance were identified:

1.2 Environmental Health and Safety

- **High facility standards of cleanliness and sanitation, safe work practices, and control of hazardous substances and equipment are employed at the facility, thereby protecting residents, staff, volunteers, and contractors from injury and illness.**

Issue: The bathrooms in Red Parrot #1 and #3 female bathrooms were dirty. [REDACTED], ICE/JFRMU, reported that the female bathroom in Red Parrot #3 smelled of mildew.

Mitigation: Staff should increase the frequency and detail of bathroom checks to ensure issues of cleanliness are addressed quickly and necessary corrective actions are taken.

7.5 Post Orders

- **Post Orders and logbooks are confidential and must be kept secure (under lock and key) at all times and will never be left in an area accessible to residents.**

Issue: The Post Order for the Cert/Escort/Utility post was found unsecured in the Intake area.

Mitigation: Remind staff that post orders must be secured at all times.

COVID-19 Pandemic

As required in Memorandum on Novel Coronavirus (COVID-19) Action Plan from Office of U.S. Immigration and Customs Enforcement dated March 2020

- **Facilities should have updated pandemic plans and policies and have established quarantine and/or isolation areas within their facilities in case they are needed.**

- **Issue:** The Center has procedures in place to address the pandemic, but not all procedures are documented in writing.
- **Mitigation:** Document all changes to operations during the pandemic in writing, to include the use of masks and personal protective equipment by staff.

Status of Previously Identified Noncompliant Areas

II. Areas of Noncompliance

There are no previously identified areas of noncompliance.

III. Areas of Compliance with Issues Identified

1.3 Environmental Health and Safety

- **Issue(s):** I observed tattered and worn artificial grass/turf. The artificial grass/turf was coming up from the surface in several areas around the Yellow Frog 1 housing unit and the recreation area near the Yellow Frog and Red Parrot housing units. This poses a tripping risk for residents and staff. There were work orders in place to fix these areas. There was a missing window screen in Yellow Frog 2 and a hole in the ground by the gym near the Green Turtle 1 housing unit. I showed pictures of the areas listed to [REDACTED], Compliance Manager. *(Observed 8/28/19)*
Mitigation(s): The aforementioned artificial grass/turf issues must be resolved by either securing the turf or replacing it. [REDACTED] administration and ICE are discussing a more permanent solution to address the artificial grass/turf issues. The screen in the Yellow Frog 2 needs to be replaced. The hole in the ground near the gym near Green Turtle 1 housing needs to be filled in with dirt. We will continue to monitor these issues.

Follow up:

11/12/2019 – Unresolved: I observed the artificial grass/turf issues noted in the previous inspection. I noted a window screen from one of the living units on the ground near the yellow housing unit. There was also trash on the ground that appeared to have blown from a nearby trash receptacle near the education trailers. There had been a significant amount of wind the previous day which may have been a contributing factor. [REDACTED] and ICE must determine a solution to address the artificial grass/turf issues. There appear to be issues with either the product or the installation which do not permit proper drainage. Inspection of the turf in the course of the regular safety inspections should be a priority, with identified problems being addressed through the regular work order process. The window screen discovered on the ground needs to be installed. Trash on the grounds needs to be picked up and properly disposed.

01/07/2020 – Partially resolved: I found the Center to be clean and well maintained. There was no trash/debris found on the grounds anywhere throughout the Center. Center staff confirmed that there is a plan in place to repair and replace the artificial grass/turf and will continue to address immediate concerns. We will continue to monitor this issue.

***Compliance Inspection: STFRC
10/05/20 – 10/26/20***

02/12/2020 – Partially resolved: I found the Center to be clean and well maintained. Center staff confirmed that the grass/turf repair project started during this inspection. I observed workers removing the artificial turf around the Yellow Frog housing unit. We will continue to monitor this issue.

10/26/20 – Partially Resolved: On 10/14/19, [REDACTED] entered into a contract with [REDACTED] to replace all substandard grass/carpet/turf to include re-leveling the surface for drainage and upgrading the synthetic turf. On 10/27/20, the project to repair and replace the artificial turf began in the Yellow Frog housing unit and was completed in April 2020. During this inspection, I observed water pooling outside the Yellow Frog and Green Turtle housing units. We will continue to monitor this issue.