

Date: October 22, 2021

To: [REDACTED], Chief, JFRMU

From: [REDACTED], Compliance Inspector
DLH Danya

Re: Compliance Inspection of the South Texas Family Staging Center

From October 5, 2021 to October 7, 2021, I conducted a monthly inspection at the South Texas Family Staging 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	Compliant
1.3 Transportation (by Land)	Monthly	Compliant
1.4 Housekeeping Program	Monthly	Compliant
2.1 Admissions and Release	Monthly	Noncompliant
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 and Inspections	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 Behavior Management	Monthly	Compliant
4.1 Food Services	Monthly	Compliant
4.2 Hunger Strikes	Monthly	Compliant
4.3 Health Care	Monthly	Compliant
4.4 Health Care (Females)	Monthly	Compliant
4.5 Personal Hygiene	Monthly	Compliant
4.6 Significant Self-Harm and Suicide Prevention and Intervention	Monthly	Compliant
4.7 Terminal Illness, Advance Directives, and Death	Monthly	Compliant
4.8 Disability Identification, Assessment and Accommodation	Monthly	Compliant
5.1 Correspondence and Other Mail	Monthly	Compliant
5.2 Educational Policy	Monthly	Not applicable
5.3 Escorted Trips for Non-Medical Emergencies	Monthly	Not applicable
5.4 Marriage Requests	Monthly	Not applicable
5.5 Voluntary Work Program	Monthly	Not applicable
5.6 Recreation	Monthly	Compliant
5.7 Religious Practices	Monthly	Compliant
5.8 Telephone Access	Monthly	Compliant
5.9 Visitation	Monthly	Not applicable
6.1 Resident Handbook	Monthly	Compliant
6.2 Grievance System	Monthly	Compliant
6.3 Law Libraries and Legal Materials	Monthly	Compliant

6.4 Legal Rights Group Presentations	Monthly	Compliant
7.1 Residential Files	Monthly	Compliant
7.2 News Media, Interviews, and Tours	Monthly	Not applicable
7.3 Staff Training	Monthly	Compliant
7.4 Resident Transfer	Monthly	Not applicable
7.5 Post Orders	Monthly	Compliant

Overall Observations

- Total population – first day of inspection: 350
- Total number of adult females: 117
- Total number of adult males: 81
- Total number of juvenile males: 82
- Total number of juvenile females: 70
- Total number of school age children: 230
- Average length of stay: 3.40 days
- Longest stay: 20 days
- Total number of discharges from August 20, 2021 to October 4, 2021: 4,251
- Total number of intakes from August 20, 2021 to October 4, 2021: 4,099

Current Inspection

I. Areas of Noncompliance

The following areas of noncompliance were identified:

2.1 Admissions and Release

- **New admissions will be processed fully (to include initial classification, clothing and hygiene issuance, medical and mental health screening, and housing assignment) in fewer than 12 hours after arrival, barring documented exigent circumstances.**

Finding: In six out of ten admission files reviewed, the Center failed to process residents within the 12 hour time frame after arrival.

Mitigation: The Center must record the time that ICE takes custody of the FAMU from CPB and must ensure that all residents are processed within 12 hours of that time.

On September 22, 2021 the JFRMU Chief issued a Memo of Understanding that stated, “Starting September 18, 2021, CPB will conduct initial processing for all family units (FAMU) onsite at the South Texas Family Staging Center (STFSC)”, and that “While the ICE FRS requires that all residents be processed within 12 hours of arrival at the Center, it is acknowledged that this processing

by ICE takes place following CBP processing. Therefore, it is also acknowledged that the 12 hour FRS processing threshold will not commence until 1) CBP concludes the FAMU processing and 2) ICE accepts physical custody of the FAMU.”

II. Areas of Compliance with Issues Identified

There were no areas of compliance with issues identified during this inspection.

Previous Inspections

I. Status of Previously Identified Noncompliance

1.2 Environmental Health & Safety

- **Centers will perform preventive maintenance and regular inspections to ensure timely emergency repairs or replacement and to prevent dangerous and life-threatening situations.**
Finding: On 6/25/2021, a staff member’s foot went through the floor in one of the court rooms. The building was subsequently closed. An incident report was completed regarding this issue and hearings have been moved to another location until repair of the floor can be completed.

On 6/29/21, a soft spot on the floor in the Visitation area was found. The Compliance Manager stated that the floor had been repaired, and the Acting AFOD indicated that the floor should be inspected by a professional to check the integrity of the repair. (*Observed 6/28/2021*)

Mitigation: The Center must ensure that regular maintenance checks are performed to identify issues before they become a safety hazard. Necessary repairs must be made in a timely manner to prevent injuries.

Follow-up:

08/17/2021 – Unresolved: The Center is conducting regular maintenance checks throughout the Center and is performing the necessary repairs to issues identified before those issues become a safety hazard. Further, the Center had structural engineers to review all the buildings at the Center and a civil engineer to review water drainage throughout the Center. CoreCivic and Target Logistics has made fixing these issues a priority, at the request of ICE. We were provided the Structural Engineer’s report. The Civil Engineer’s report has not been received. The Center staff provided the following timeline for repairs:

Floor Renovation Progress (Courtroom, Library Schedule)

- a. Courtroom BLDG Phase 1 and BLDG 100 complete – cleared by structural engineer.
- b. Final courtroom Completed 8/19/2021
- c. Library start date: 8/19/2021
- d. remaining buildings TBD

We will continue to monitor these issues.

10/05/2021 – Resolved: A walk-through inspection was conducted with John Wolf, VP Construction, Target, Donnie Hyatt, Senior Director, Facilities Management and Jeff Ball, Operations Manager, Target. We toured the damaged areas cited in the June 25, 2021 report - the Courtroom and Visitation areas - as well as the library. Those areas were repaired according to the recommendations made by the structural engineers and found to be safe. All areas that were cited as areas of immediate concern in the structural engineer's report have been resolved.

II. Status of Previously Identified Areas of Compliance with Issues

There were no previously identified areas of compliance with issues.