



September 2, 2021

TO: [REDACTED]
Acting Assistant Director Custody Management

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

SUBJECT: **Pre-Occupancy Inspection of the West Tennessee Detention Facility**

The Nakamoto Group, Inc. performed a pre-occupancy inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2011) of the West Tennessee Detention Facility in Mason, Tennessee during the period of August 31-September 2, 2021. This is a DIGSA 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 a pre-occupancy inspection which was performed to determine overall compliance with the ICE PBNDS 2011 for Over 72 hour facilities.

Inspection Summary

The West Tennessee Detention Facility is currently accredited by:

- The American Correctional Association (ACA) - Yes
- The National Commission on Correctional Health Care (NCCHC) - Yes
- The Joint Commission (TJC) - No
- Prison Rape Elimination Act (PREA) - Yes

Facility Snapshot/Description

The West Tennessee Detention Facility is a [REDACTED] facility owned and operated by CoreCivic. The facility, located in Mason, Tennessee, approximately thirty miles east of Memphis, has been housing male and female detainees for the United States Marshals Service (USMS) and ICE. [REDACTED]

[REDACTED] The facility has been housing ICE detainees in accordance with PBNDS



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2008. The current contract with the USMS will end September 30, 2021. The facility will change mission and become a DIGSA, housing ICE detainees in accordance with PBNDS 2011.

The facility is situated on approximately 43 acres near residential and commercial areas. The 141,062 square-foot physical plant, originally built in 1991 to house 440 detainees, was expanded in 1996 to house 600. The building is precast concrete with a full sprinkler system with heat and smoke detectors throughout. Administration and support services and detainee housing units are located under one roof and controlled by video surveillance and double fencing with razor wire around the facility. The inner fence is equipped with an electric stun deterrent. The facility uses a closed-caption television system with five DVRs to store historical video. There are 11.6 acres inside the perimeter fence.

Detainees are housed in double-bunked cells, dormitories, or single segregation cells. The facility is designed with twelve living units. Each pod has twenty, two-man cells. All cells are approximately 112.5 square feet and offer each detainee 52 square feet of unencumbered space. Each cell has a wash basin, toilet, window, and storage areas. Each of the eleven pods has a dayroom with enough table space for meals, recreation, and study. One pod is a special management unit with a separate outdoor recreation area. Each cell has an intercom unit for contact with staff.

The facility has two dormitory areas with seventy single bunks. There is a three-foot wall separating the sleeping area from the dayroom. Another three-foot wall separates the toilets and shower facilities from the living area. In addition to outdoor recreation areas, there is an indoor gymnasium with 5,922 square feet of floor space.

The facility offers work activities for those detainees who wish to volunteer. A general library and a legal library are available for detainees. The housing units have large dayroom areas equipped with televisions, telephones, and a microwave. Dayroom activities will include watching television, leisure reading, board games, puzzles, and other sedentary activities. Electronic tablets will be provided in each housing unit allowing detainees access to LexisNexis, communicating with staff, playing games, and participating in video visits with family and friends. The outdoor recreation activities will include basketball, soccer, and volleyball. Exercise stations and pull-up bars will be provided. The recreation specialist will organize competitions and tournaments for the detainee population.

Areas of Concern/Significant Observations

All existing policies need to be revised to address the requirements of PBNDS 2011 and all staff must be trained on the requirements of the Standards and the new policies. Of significant concern should the facility receive detainees prior to the updates and training, is the fact that the current Significant Self-Harm and Suicide Prevention and Intervention policy does not require that a detainee who is at "risk" for significant self-harm or suicide be referred to the mental health provider for an evaluation and that the evaluation shall take place within 24 hours of the identification. The Standard requires that welfare checks be conducted by clinical staff at least every eight hours; this is not addressed in the current policy.

The facility does not have a policy for Disability Identification, Assessment, and Accommodation, nor has staff received training for identifying, assessing and accommodation of detainees with disabilities.

The inspection was conducted as a hybrid with some inspectors on-site and some working remotely. Remote inspectors were unable to personally observe practices and procedures within the facility. The remote inspectors relied upon photographs and/or videos to validate the observation of many standards.

Recommended Rating and Justification



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This pre-occupancy inspection does not include ratings. Written policy and procedure that address the PBNDS 2011 are in place or are being developed and the facility handbook and orientation video are being developed. If policy revisions and employee training are completed and policy is followed, the facility will comply with detention standards.

LCI Assurance Statement

The findings are accurately and completely documented on the G324 Inspection Form and are supported by documentation in the inspection file. An out brief was conducted at the facility. In addition to the on-site Nakamoto Group Inspection Team and Medical SMEs working remotely, the following were present or participated by telephone:

- ICE Staff: [REDACTED]
- CoreCivic Staff: [REDACTED]

[REDACTED] Lead Compliance Inspector	September 2, 2021
Printed Name of LCI	Date

