

September 12, 2003

Memorandum for: Anthony Tangeman, Deputy Executive Associate Commissioner,
Office of Detention and Removal, BICE

From: American Bar Association Delegation to El Paso Service Processing Center

Subject: Report on Observations during a Tour of the El Paso Service Processing Center

I. Introduction

This memorandum evaluates and summarizes facts and findings gathered at the Service Processing Center in El Paso, Texas. The information was gathered via observation of the facility by the delegation and interviews with detainees and facility staff on July 9, 2003.

The Bureau of Immigration and Customs Enforcement (BICE) (formerly the INS) promulgated the “*INS Detention Standards*” in November 2000 to insure the “safe, secure and humane treatment of individuals detained by the INS.” The thirty-six *Standards* contained in the Detention Operations Manual cover a broad spectrum of issues ranging from visitation policies to grievance procedures and food service. These standards apply to BICE Service Processing Centers (“SPCs”), Contract Detention Facilities (“C.D.F.”), and state and local government used by BICE through Intergovernmental Service Agreements (“I.G.S.A.”). The Detention Standards went into effect at SPCs on January 1, 2001, and were to have been implemented at each facility by January 2003. The *Standards* constitute a “floor” not a “ceiling” for treatment of BICE detainees. In other words, they are meant to establish the minimal requirements that BICE must adhere to in the operation of its facilities. Each District Office or Officer in Charge (“OIC”) of a facility may, in his or her discretion, promulgate policies and practices affording BICE detainees more enhanced rights and protections than those provided for by the *Standards*.

II. The El Paso Facility

The El Paso Service Processing Center (“El Paso SPC”) is located in El Paso, Texas, on the Mexican border. The facility houses both men and women, segregated according to their criminal/disciplinary history. Most detainees do not have a criminal history, other than immigration violations.

El Paso SPC has a capacity of 784 detainees. On the day we visited, the population was 670, including 93 women, with 2 individuals in the segregation unit. The average detainee sees a judge in two weeks. This is a considerable improvement from only a year ago, when an individual might wait up to a month for his/her first hearing. Many of the Mexican detainees leave immediately after seeing a judge. However, detainees from other countries must wait longer for travel arrangements to be made before departure. The facility has worked closely with several foreign consulates to

attempt to speed up departure for large groups from those countries. The average length of stay in the facility is 23 days, due to the large number of Mexican nationals at the facility who leave quickly. For those detainees who are pursuing legal remedies to deportation, the typical stay varies from several months to over a year.

Detainees arrive at the facility from a number of sources, primarily from the Border Patrol. Most detainees are from Mexico. According to the staff, the countries currently most represented among detainees after Mexico are Brazil, Guatemala, El Salvador and Honduras. There are also Asian, African, and Middle-Eastern detainees.

El Paso SPC is a secure facility, surrounded by fences with concertina wire. The detainees' schedules are highly regulated, and they may not move from one part of the facility to another without being escorted by a guard. There is a processing facility, a law library, a dining facility, and a medical facility. Each housing unit opens onto an outdoor recreation facility. We visited two types of housing units, a newer model and an older one. In the newer model, beds were placed around a central area with tables for indoor recreation. In the older model, the area with beds was somewhat separated from the indoor recreation area, providing a more private area for sleeping. However, the staff stated the newer model is easier to police, since everyone is in a central area. Toilet and shower facilities are segregated from the housing unit by partial screens, but are open within. The staff stated that individuals who have difficulty with the lack of privacy have been accommodated with escort to a more private area in extreme situations.

The *Standards* require that each facility “develop a site-specific detainee handbook to serve as an overview of, and guide to, the detention policies, rules, and procedures in effect at the facility. The handbook will also describe the services, programs, and opportunities available through various sources including the facility.” The handbook is supposed to constitute a comprehensive guide to life in the facility and include, at a minimum, the information specified in Section III, A through J of the *Detainee Handbook Standard*, of the *Standards*. The purpose of the handbook requirement is to give detainees notice of all applicable rules, policies, and privileges of the facility.

El Paso SPC staff stated that each detainee gets a handbook upon arrival. We were provided with a copy of the handbook, which complies with the above standard. The handbook is printed with both English and Spanish in the same booklet. One of the five interviewees stated he had not been given a copy of the handbook and another stated he had been given it, but not immediately upon entry.

III. Observation of Implementation of Legal Access Standards

The remainder of this memorandum focuses on portions of the *Standards* relating particularly to areas of legal access, as well as general concerns raised out of observations during the general tour. BICE's stated goal in promulgating these *Standards* was: To insure the “safe, secure, and humane treatment” of detainees. In particular, the memorandum focuses on El Paso SPC's *Standards* concerning access to counsel and legal rights, including the following: (1) Visitation; (2) Telephone Access; (3) Legal

Materials; and (4) Group Rights Presentations. The memorandum also addresses other concerns observed during the course of the visit including: Recreation Issues; Medical Care and Religious Issues.

A. Visitation

The range of permissible visitors at El Paso SPC includes: attorneys, legal representatives, friends and family. Contact visits are allowed, although space is limited.

1. Visitation by Attorneys

a. Visitation Times

According to the *Standards*, legal visitation should be allowed seven (7) days a week for a minimum of eight (8) hours on weekdays, and four (4) hours on weekends. Legal visitations should not be terminated for meals or routine official counts. Procedures should be in place to permit the detainee to receive a meal, or recreation, after the interview.

The El Paso facility exceeds the minimum legal visitation policy, allowing attorneys access seven days a week, thirteen hours a day. The handbook states that in emergencies, 24 hour access will be provided, if possible. Paralegals and accredited representatives are allowed access eight hours a day Monday through Friday and four hours a day on weekends, in accordance with the *Standards*. Sack meals are provided for detainees who must meet with their legal representatives during mealtime. The handbook is silent as to make-up of lost recreation time.

b. Attorney Access

Attorneys are granted access upon proof that they are attorneys (bar card or other documentation). G-28s are not required to be filed prior to a first interview. Paralegals and accredited representatives must be on an approved list to be admitted.

c. Security Concerns

The *Standards* provide that, in BICE owned-and-operated SPC facilities, detainees should not be strip-searched after legal visitation, unless there is reasonable suspicion that a detainee is concealing contraband.

Previously, the El Paso facility had a policy in place to strip search detainees after contact visits with attorneys. According to the OIC, this policy has been changed and detainees are not now routinely strip-searched after contact visits with attorneys. Strip searches are now reportedly only performed where there is reasonable suspicion of a security violation or problem.

d. Access to Contact Information for Legal Services

The Detainee Handbook states that a list of free legal organizations will be posted in all detainee housing areas and other appropriate areas. Similarly, the *Standards* provide that information lists with pro bono and non-governmental agency information should be provided in the detainee's language, updated, posted clearly, and accompanied by instructions on how to contact such agencies. The delegation was shown a current posting of free legal services in the housing units visited.

Three of the detainees interviewed stated that they were well aware of the existence of pro bono or reduced rate legal services, as they are posted prominently in the housing units. They stated that staff members had assisted them in contacting those agencies. However, two of the individuals complained of the non-response of one listed agency and the fees charged by another.

e. Visitation Conditions

The *Standards* provide that facilities should allow detainees to meet privately with their current, or prospective, legal representatives and legal assistants, and to meet with their consular officials. The policy concerning legal service visitation is also outlined in the Detainee Handbook.

The attorney visitation area at the El Paso SPC has a row of booths, with plexiglass separating attorneys from clients. Attorneys must speak to their clients through telephones in this area. The area has no privacy from the SPC staff, on either side of the dividers. Attorneys do not have the privacy required for confidential communication with their clients in this area. Moreover, if more than one attorney is visiting at a time, it is very noisy and difficult to hear through the telephones.

There are four contact rooms available for use by attorneys. These areas provide a private, quiet area for confidential communication with clients. However, during busy periods, there are sometimes more than four attorneys visiting clients at any one time. Thus, it is not always possible to communicate privately with one's clients. The staff stated that the contact rooms may be reserved in advance. However, in practice this has proved difficult, since the staff does not always man the phones to the facility and the voice mail box is often full, allowing no telephone access to the main desk.

Attorneys are allowed visits during meal or count times without interruption. Detainees are provided snacks in the case of missed meals. According to the staff, interpreters may accompany attorneys during contact visits, with advance permission. Interpreters are also allowed in the non-contact area, but the physical arrangement of this area makes it very difficult to accommodate an additional person.

The same problem that exists with reserving contact rooms in advance (not always possible to get someone on the phone and mailbox full) also provides a challenge when trying to locate detainees by phone. However, if one can get through on the phone system and knows the detainee's A-number, it is relatively easy to locate the detainee.

2. Visitation by Family, Friends, and the Media

a. Visitation Times and Duration

The *Standards* provide that Facilities should permit authorized persons to visit detainees within secure and operational constraints. To maintain detainee morale and family relationships, BICE encourages visits from family and friends. Additionally, facilities should permit members of the media and non-governmental organizations to have access to non-classified and non-confidential information about the facility's operation. The *Standards* provide that visiting hours should be clearly posted and permitted during set hours on weekends and holidays. Special arrangements should be available for family members who are unable to visit during regular visiting hours. Visits should be for at least 30 minutes.

The visitation schedule was posted in the visitor lobby and is listed in the Detainee Handbook. According to the Handbook, visiting hours for general visitation are 7:00 p.m. through 9:30 p.m. Monday through Friday. On weekends, the hours are 12:00 pm to 3:00 pm. Special visits during other days and hours may be scheduled by appointment. We were advised by the staff that they do allow families with special circumstances (i.e., traveling from out of the area) to visit during non-standard times. . Contact visits must be requested and scheduled in advance. Visits with family members who are also detainees are only scheduled on weekends and holidays. According to the staff, there are currently no family members detained at the facility.

The *Standards* require that visits should be for at least 30 minutes. The staff advised us that, while this is their goal, there are times when it is not feasible, due to the number of visitors present at the same time. They stated that when there is a large group of people waiting to visit, visits are limited to 20 to 30 minutes. When there is no line waiting, there is no restriction on visit length.

b. Other Limits on Visitors

The Handbook states that if the visitors bring children 17 years of age or under, they are expected to remain under the direct supervision of the adult visitors so they will not disturb others who have visitors. Visitors must follow the posted dress code. All items passed between visitors and detainees must be pre-approved by a staff member.

c. Security Concerns

The *Standards* provide that detainee's at BICE facilities may be subject to a pat-down search before a contact visit and may be subject to a strip search after a contact visit. The Detainee Handbook provides that detainees will be searched upon admission to the Facility and when there is reasonable cause to believe that the detainee may have contraband concealed on his or her person. It does not specify whether these are strip searches or pat down searches. According to the staff, in the past, strip searches were conducted after contact visits with attorneys and/or family members. However, the director stated that a new policy is now in effect and detainees will only be strip searched after contact visits with attorneys if there is reasonable cause to believe the detainee has obtained contraband from his or her attorney.

B. Telephone Access

The *Standards* provide that facilities shall permit detainees to have reasonable and equitable access to telephones. Phone booths were present in all of the housing units, with nearby bulletin boards listing various telephone numbers, consular telephone numbers, instructions to use the telephones, and telephone rates. Overall, El Paso SPC appears to have an adequate number of phones. The telephones were equipped with debit card systems, with instructions in English and Spanish. Detainees are able to purchase debit cards to make local calls for \$0.18 per minute. Long distance calls are \$0.85 per minute and international calls are \$0.90 per minute to Mexico and \$0.99 per minute to other countries.

The *Standards* dictate that detainees should be able to make free calls through pre-programmed technology to consular offices, free legal service providers, local courts, government offices and family members (in case of emergency). The staff advised us that detainees may make free calls in the above-mentioned cases, and that detainees who have no funds may additionally make free calls to family members and attorneys in non-emergency situations. The director advised the tour members that if such problems are experienced in the future, to contact him with the details and he will resolve the problem.

BICE standards require that detainees should be able to discuss their legal cases on the phone in a private environment. The phones in the El Paso facility do not provide such privacy. The phones are in a visible, open environment, surrounded by other detainees and/or guards. However, we were advised that the calls are not monitored and there is no attempt made to listen to phone calls. The phones are not located near the guard station. The main problem with the phones appears to be that it is very noisy in the area.

Staff members indicated that attorneys may leave messages for detainees with the deportation officers. In practice, one attorney on the tour had had good luck with this procedure, and one had not. Several of the detainees interviewed stated that they did not see their deportation officers regularly, and one claimed he had not been able to get in contact with his deportation officer for two months when he needed him. Again, the director asked us to bring problems to his attention when they occur. He stated the policy is for deportation officers to visit their assigned detainees once a week.

Two of the interviewed detainees stated they had had trouble with the phone system. One of them stated he had been cut off several times, and could not get through to local numbers with his phone card on occasion. He stated he made complaints about these problems and that the problems seem to have been resolved. The second detainee stated he had been cut off from telephone calls on several occasions with a family member when discussing complaints about the facility. That individual also stated it takes up to two days to get access to free phone calls when needed.

C. Legal Materials

The *Standards* mandate that the El Paso facility shall establish and maintain a law library. The library must be adequately lighted, reasonably quiet, and large enough to support legal research and writing. It must also contain an adequate number of tables and chairs to accommodate all detainees who wish to use the facility. Finally, the library should provide one typewriter or computer per five detainees, as well as sufficient writing materials and texts to enable detainees to conduct research and prepare legal documents.

The El Paso library facility provides adequate space and facilities for legal research and writing. According to the staff, any detainee could visit the library during scheduled visiting hours to work on his/her case. Visits to the library for recreational purposes are restricted to limited numbers of detainees on a first-come first-served basis. The library schedule posted in the Detainee Handbook provides for visits five days per week by men, but only two days per week are set aside for visits by women, due to the low number of women at the facility. Detainees are not allowed to visit the library for the purpose of assisting other detainees with their cases. However, according to the staff, there was no restriction against detainees helping other detainees with their cases in the housing areas.

1. Materials Identified in Attachment A-2 of the *Standards*

The *Standards* require the El Paso library to maintain the legal materials listed in Attachment A-2 of the *Access to Legal Materials* chapter of the *Detention Operations Manual*. These materials must be updated regularly and supplemented with timely information regarding significant regulatory and statutory changes affecting the detention and deportation of aliens. A current list of available texts and materials should be posted in the library. To ensure these requirements are met, the facility must designate an employee with responsibility for inspecting, updating and maintaining the library materials in good order

The El Paso library appeared to have all of the materials required. A listing of the materials was posted in the library and was presented to the tour participants. Additionally, the library maintains updated access to West Law on CD Rom. The library manager informed us he is working to obtain on-line access to West Law, but so far has not been able to resolve the security issues. Library staff members are available at all times during visiting hours to assist detainees with locating needed materials.

2. Library Conditions

The El Paso library is adequately lit and spacious. It contains several large tables for working, in addition to the computer and typing stations. There are two computers and five typewriters. There appears to be an adequate supply of paper and pencils.

3. Photocopies and Mail

Detainees are provided with photocopies of materials upon request. There is no charge for photocopies of materials needed for one's legal case.

Under the *Standards*, indigent detainees should be provided with two envelopes and three regular stamps for legal mail. Specifically, the *Standards* provide that "[t]he facility will provide indigent detainees with free envelopes and stamps for mail related to a legal matter, including correspondence to a legal representative, potential legal representative, or any court." According to staff members, the facility provides postage and envelopes to all detainees upon request. However, detainees must purchase their own postage for packages.

4. Assistance for Illiterate and Non-English Speakers

The *Standards* provide that detainees who are not proficient in English, or who need other assistance in preparing legal documents, should have the opportunity to seek such assistance from other detainees, or *pro bono* counsel.

The Handbook states that detainees may not assist one another while in the library. Library staff members are available to assist all detainees in the library. Presumably, this would only include those detainees who can speak either English or Spanish.

D. Group Rights Presentations

The *Standards* provide that facilities shall permit authorized persons to make presentations to groups of detainees for the purpose of informing them of U.S. immigration law, and procedures consistent with the security and orderly operation of the facility. All facilities must cooperate fully with authorized persons seeking to make such presentations.

The El Paso facility facilitates group rights presentations by three local agencies, CLINIC, Las Americas and the Diocesan Migrant Refugee Service. The presentations are given each Friday, with a rotating schedule between the agencies presenting them. In addition, the Florence Project "Know Your Rights" video is shown daily to interested viewers. The Handbook states that presentations are held on both Wednesdays and Fridays, and that the housing unit officer would advise persons when the presentations would take place. Among the interviewed detainees, it appeared that some detainees are not aware of the presentations being given. This appeared clearly to be a matter

involving lack of communication, not any attempt by the facility to keep detainees from attending the presentations.

IV. Other General Observations Unrelated to the Legal Access Standards

A. Recreation

The *Standards* require generally that “all facilities shall provide BICE detainees with access to recreational programs and activities, under conditions of security and supervision that protect their safety and welfare.” In addition, the *Standards* provide that “[e]very effort shall be made to place a detainee in a facility that provides outdoor recreation. If a facility does not have an outdoor area, a large recreation room with exercise equipment and access to sunlight will be provided.” Where outdoor recreation is available, each detainee must have access to at least one hour per day of recreation, five days a week, weather permitting.

The El Paso facility allows each detainee one hour per day of outdoor recreation in a yard attached to the housing unit. There are facilities for basketball, soccer and weightlifting. Detainees may arrange tournaments if approved. Recently, aerobics classes have been arranged for women detainees. Sports equipment and wear are provided for participation in tournaments and other games. Individuals in segregation have access to a basketball court for outdoor recreation.

Indoor recreation includes television, ping-pong and board games. In addition, the staff arranges for bingo tournaments and board game competitions. In the newer housing units, noise appears to be a considerable problem for those wishing to watch television, since the recreation area is not separated from the main living unit. In the older housing facilities, the recreation area is partially separated, allowing for a somewhat more pleasant environment for indoor recreation.

B. Work Opportunity

According to the staff, any detainee who wants to can work. Detainees are allowed to work up to 40 hours a week, and are paid in cash, at the rate of \$1.00 for each eight hours of work. Long-term detainees are given preference in job assignments, since the more interesting job assignments require some amount of training. Those who volunteer for kitchen staff receive a certificate of training after a certain period of time in that job.

One interviewed detainee felt that the job assignments were not given out fairly (he didn't think it was fair for long-term detainees to get the “best” jobs) but agreed that, if one was willing to take any assignment, there was work available for all. Another interviewee believed that preferential treatment was given to Spanish-speaking detainees. However, he did acknowledge that this could be due to practical considerations (having a whole team able to communicate within itself) rather than to any sort of prejudice.

C. Medical Care

The *Standards* set forth a broad policy that “detainees ... have access to medical services that promote detainee health and general well-being.” The *Standards* require that detainees be provided with an initial medical screening and have access to primary care, and emergency care. Although emergency dental care is required, “[r]outine dental treatment may be provided to detainees from whom dental treatment is inaccessible for prolonged periods because of detention for over six months.”

The facilities in El Paso are operated by U.S. Public Health Services personnel. There appears to be good medical care available to all detainees. There are physicians and nurses on staff, as well as a psychologist and a counselor.

All detainees receive an initial medical screening. Women are all screened for pregnancy. Emergency medical care is available 7 days a week, 24 hours a day. Sick call is conducted daily, with first preference being to those who are most sick. Detainees must sign up in advance for sick call, the evening prior, between the hours of 5:00 and 7:00. Thus, it appears that if you become sick after 7:00 pm at night, you might not see a doctor until two days later. The staff stated that virtually all (non-emergency) sick call cases are handled within 48 hours. One detainee interviewed confirmed that one could wake up feeling sick one morning and not be allowed to go to sick call until the next day.

There is a system in place to provide special diets to detainees for medical reasons. The medical staff has a plan in place to deal with contagious diseases which might sweep through a housing unit. The hospital facility has nine beds, three in isolation. There are agreements in place with local health care providers to provide care that the staff at the El Paso facility cannot provide.

Overall, with the minor exception of potentially delayed access to non-emergency sick call, the facility appears to be providing appropriate access to medical care to detainees.

D. Religious Issues

Religious needs appear to be well cared for at the El Paso facility. A schedule of religious services is posted in all the housing units. Services are available six days a week. Those with special religious needs may make a request to the Chaplain. The Chaplain stated he has been able to facilitate any legitimate requests for special diet/services. However, one interviewed detainee did claim that he had made three requests for a Bible, to no avail.

Special religious diets may be requested of the Chaplain. If the Chaplain finds the request valid, he authorizes the diet. One interviewed detainee was very appreciative of the special dietary provisions made for him (he was Jewish). He had only one complaint, and it did not pertain to a staff member. He stated that he and some of the other Jewish detainees saw one of the detainee kitchen work detail using a non-kosher utensil to cut

their food. When asked if he had complained about this, he said no. He stated that he was so happy in general with the special accommodations made for his faith that he did not want to rock the boat or create any problems.

The Chaplain has tried to accommodate all faiths and believes he has been relatively successful. The Jewish detainee interviewed praised the accommodations made for his faith highly. The Jewish detainees had been provided with a quite, private place for worship and with the candles necessary for their worship.

The Chaplain has a special fund to purchase religious items for detainees. He makes every effort to allow for relevant religious celebration of feast days in all religions.

E. Detainee Classification

All detainees are classified upon arrival. The initial determination is made based on a detainee's criminal history. Felons are classified at the highest security level. Successive determinations are made based on a detainee's disciplinary record. Most of the detainees at the El Paso facility do not have a criminal history, other than immigration violations.

There are three levels of classification. Detainees are segregated by the color of their uniforms, for easy identification. The Handbook states that a classification level may be appealed to the Classification Officer. However, detainees under disciplinary restrictions may not appeal their classifications.

F. Grievance and Disciplinary Procedures

1. Discipline

The disciplinary procedure described in the Detainee Handbook consists of a listing of the different categories of offenses and their possible sanctions. These categories include "Greatest" (e.g., killing, rioting, or hostage taking), "High" (e.g., including engaging in sexual acts or extortion), "High Moderate" (e.g., indecent exposure, stealing or insolence towards a staff member), and "Low Moderate" (e.g., malingering, smoking where prohibited, using abusive or obscene language). The possible sanctions are many, and range anywhere from the initiation of criminal proceedings, disciplinary transfer, or disciplinary segregation to monetary restitution, loss of privileges, restriction to housing unit, a reprimand, or a warning.

The Handbook provides detailed rules for responses to disciplinary infractions, including detailing the detainee's rights. The staff advised us that the El Paso facility does not actually have a great deal of disciplinary problems, due to the low percentage of criminals in the population.

2. Grievance Procedure

The *Standards* provide that each facility must develop standard operating procedures that address grievances and must guarantee against any reprisals. An informal procedure should be in place for a detainee to present his or her concern to any staff member at any time.

The Detainee Handbook states that no adverse actions will be taken against anyone for filing a grievance. However, those considered to be abusing the grievance system will have their grievances returned to them unprocessed. The Handbook states that the facility will make every effort to resolve grievances at the lowest possible level. Staff members are encouraged to attempt to resolve problems informally, when it is within the scope of their authority. Detainees are not required to pursue grievances at the lowest level, or informally, if they do not believe this would be productive.

Formal written grievances must be submitted five days after the event complained of or five days after the unsuccessful resolution of an informal grievance. Detainees are allowed to assist one another in filing grievances, but may not actually submit grievances on another's behalf.

The Handbook states that "if possible" the results of the grievance will be translated into the grievor's native language. The staff stated that they have plans in effect to communicate effectively with all detainees in the facility. They do rely on other detainees where there is a language problem. They also have access to telephone translation services.

If a detainee is not happy with the results of his grievance, he may appeal the results within five days to a Detainee Grievance Committee, chaired by the Assistant OIC. The detainee may present his case to the committee and will receive a written response. That decision may be appealed to the OIC.

The El Paso facility has an Emergency Grievance procedure in effect for situations involving imminent danger to a detainee's health and welfare. Additionally, there are procedures in place to provide for confidential filing of a grievance.

The Detainee Handbook provides the address and phone number for making a complaint of officer misconduct or abuse to the Department of Justice.

G. Miscellaneous

Several detainees complained of difficulties in getting cash in the facility, in order to purchase phone cards. Postal money orders are only cashed once a week. Therefore, if a money order arrives on certain days, it may be nearly a week before the detainee has access to the money. Some detainees have had cash sent through to mail to avoid this problem, not a particularly secure solution. One detainee had had \$200 in cash sent through the mail lost for a period of time. He believed the staff worked to find it as

quickly as possible. One detainee had been denied access to free phone calls because he had funds available. However, the funds were in the form of a money order and thus not really available at the time. The OIC stated if this happened in the future to contact him with details and he would resolve it.

V. Conclusion

There were minor problems noted on the tour and voiced to the OIC. He seemed genuinely receptive to fixing any problems that arose in the future. Areas where tour participants and/or interviewees felt improvements could be made were:

- Better facilities for attorney visitation, to insure confidential client communications
- More privacy at telephone stations in the housing areas
- Ability to use 800 numbers at telephone stations in the housing areas, or quicker access to funds sent via money order

Overall, the tour participants were impressed with the El Paso facility. The OIC and staff were extremely open, helpful and generous with their time during the tour.