



U.S. Department of Homeland Security

Immigration and Customs Enforcement

Office of Professional Responsibility

Inspections and Detention Oversight

Washington, DC 20536-5501

**Office of Detention Oversight
Compliance Inspection**

**Enforcement and Removal Operations
Miami Field Office
Wakulla County Detention Facility
Crawfordville, Florida**

February 26 – 28, 2013

**COMPLIANCE INSPECTION
WAKULLA COUNTY DETENTION FACILITY
MIAMI FIELD OFFICE**

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EXECUTIVE SUMMARY

The Office of Professional Responsibility (OPR), Office of Detention Oversight (ODO) conducted a Compliance Inspection (CI) of the Wakulla County Detention Facility (WCDF) in Crawfordville, Florida, from February 26 to 28, 2013. WCDF, which opened in 1991, is owned and operated by the Wakulla County Sheriff's Office, and serves as a regional jail for males and females. U.S. Immigration and Customs Enforcement (ICE) began housing detainees at WCDF in 1994. ICE currently houses male detainees of all classification levels (Level I – lowest threat, Level II – medium threat, Level III – highest threat) for more than 72 hours at WCDF under an intergovernmental service agreement (IGSA). WCDF has a total capacity of 350 beds. Bed space for ICE detainees is available as-needed; the remaining bed space is used by the U.S. Marshals Service, and state and local law enforcement agencies in the surrounding area. During the CI, WCDF housed 76 male ICE detainees and no female ICE detainees. The average ICE daily population is 100, and the average length of stay is 35 days. Armor Correctional Health Services provides medical care and Trinity Food Services provides food services under contract. The Florida Corrections Accreditation Commission currently accredits WCDF.

The ICE Enforcement and Removal Operations (ERO) Field Office Director (FOD) in Miami, Florida, (ERO Miami) is responsible for ensuring facility compliance with ICE policies and the ICE National Detention Standards (NDS). An Assistant Field Office Director, who is physically located in the sub-office in Orlando, Florida, oversees ICE detention operations at WCDF. No ICE personnel are permanently assigned to the facility. A Supervisory Detention and Deportation Officer and a Supervisory Immigration Enforcement Agent from the sub-office in Tallahassee, Florida, supervise weekly scheduled and unscheduled visits to the facility. ICE personnel regularly monitor detention conditions and interact with WCDF personnel. There is no Detention Service Manager assigned to WCDF.

The Wakulla County Sheriff is the highest ranking official at WCDF, and is responsible for oversight of daily operations. (b)(7)e personnel are employed at WCDF, including the Jail Administrator, the Assistant Chief of Operations, an executive assistant, a human resources manager, the Health Service Administrator, the Medical Director, the Food Service Director, (b)(7)e captain, (b)(7)e lieutenants, (b)(7)e sergeants, a warehouse supervisor, and a chaplain.

In March 2011, ODO conducted a Quality Assurance Review (QAR) at WCDF. Among the 24 NDS reviewed, 14 were in full compliance. The remaining ten standards accounted for 18 deficiencies.

In November 2012, the ERO Detention Standards Compliance Unit contractor, Nakamoto Group, Inc., conducted an annual review of the NDS at WCDF. WCDF received an overall recommended rating of "Acceptable," and was found compliant with all 38 standards reviewed.

During this CI, ODO reviewed 23 NDS. ODO found eight deficiencies in the following five standards: Admission and Release (1 deficiency), Detainee Grievance Procedures (3), Detention Files (2), Environmental Health and Safety (1), and Staff-Detainee Communication (1). ODO identified two repeat deficiencies from the 2011 ODO QAR in the following standards: Detainee Grievance Procedures (1) and Staff-Detainee Communication (1). Among the 23 standards reviewed, 18 were determined to be fully compliant, including: Access to Legal Material;

Detainee Handbook; Disciplinary Policy; Emergency Plans; Food Service; Funds and Personal Property; Hold Rooms in Detention Facilities; Hunger Strikes; Medical Care; Recreation; Religious Practices; Special Management Unit (Administrative Segregation); Special Management Unit (Disciplinary Segregation); Suicide Prevention and Intervention; Telephone Access; Terminal Illness, Advance Directives, and Death; Use of Force; Visitation. As these standards were compliant at the time of the review, a synopsis for these areas is not included in this report.

This report includes descriptions of all deficiencies and refers to the specific, relevant sections of the NDS. ERO will be provided a copy of this report to assist in developing corrective actions to resolve all identified deficiencies. These deficiencies were discussed with WCDF and ICE personnel on-site during the inspection and during the closeout briefing on February 28, 2013.

ODO found one deficiency in the Admission and Release standard at WCDF. The NDS requires a Report of Detainee's Missing Property, Form I-387, to be available in the intake processing area, and completed when a new detainee claims his or her property has been lost or left behind. ODO found WCDF does not maintain copies of Form I-387 in the intake processing area.

ODO found three deficiencies in the Detainee Grievance Procedures standard at WCDF. First, WCDF does not have a written policy describing how to handle emergency grievances, ensuring detainees' safety and welfare. Second, detention files do not contain copies of grievances and corresponding dispositions. Third, grievances pertaining to officer misconduct are not reported to ICE. Although allegations of misconduct have been resolved by WCDF personnel, the facility is still required to report all cases of misconduct to ICE.

ODO found two deficiencies in the Detention File standard at WCDF. First, WCDF does not maintain a chain of custody log for detention file access. WCDF personnel stated that since detention file access is restricted to officers in the intake processing area, they do not maintain a log. Second, ERO does not maintain duplicate detainee files at the field office for each detainee housed at WCDF. The NDS requires the detention files at the facility and field office contain the same information.

ODO inquired with WCDF management about their sexual assault and abuse policies and procedures. WCDF has a sexual abuse and assault program with comprehensive policies and procedures. Detainees are screened during the intake process to identify any sexual abuse victimization, or sexual predatory history or potential. ODO verified detainees are made aware of the SAAPI program by way of the detainee handbook, orientation program, and by postings in the housing units. In addition, detainees receive a Sexual Misconduct Orientation Form, which offers guidance for prevention, describes the reporting procedures, and defines of sexual misconduct. Detainees must acknowledge receipt of the form. All SAAPI information is provided in the English and Spanish languages. The facility's designated SAAPI Coordinator received training in the Prison Rape Elimination Act requirements, and is in the process of developing a Sexual Abuse Response Team. The Coordinator has developed extensive lesson plans, and conducts pre-service and annual refresher training for all facility personnel. Since ODO's previous visit to WCDF, one incident of a sexual assault was reported by a detainee. The alleged victim reported to ERO and WCDF personnel that he was sexually assaulted prior to entering ICE custody. Even though the alleged sexual assault occurred outside

of ICE custody, ERO reported the incident to the Joint Intake Center. ODO confirmed that the incident was investigated by the Florida Department of Corrections.

ODO found one deficiency in the Staff-Detainee Communication standard at WCDF. Detention files and logs indicate that ERO personnel are not responding to detainee request forms within 72 hours as required by the NDS.

ODO did not identify any deficiencies in the Use of Force standard, but recommends WCDF make changes to its policy and practice with regarding to Use of Force. First, ODO recommends WCDF update its use of force policy to require reporting to ICE of all use of force cases. Second, ODO recommends that in situations where there is no immediate threat, WCDF staff first consider confrontation avoidance. ODO reviewed records for one use of force incident, and determined confrontation avoidance may have resulted in a different outcome. According to SMU records, a detainee was secured in a housing unit after using the recreation yard. From outside the unit, an officer observed the detainee on his way to use the shower, and ordered him to return to his cell and lockdown. The detainee claimed a Sergeant had given him permission to shower, and he refused to return to his cell. The officer then entered the unit, applied an escort hold, and attempted to move the detainee to his cell. The detainee pulled away, prompting the officer to re-engage the detainee, who physically resisted the attempt. Additional personnel responded to the unit, and the detainee was put in restraints. Though the force used was minimal, immediate force was unnecessary. The detainee was behind a secured door and did not pose a risk to the officer, himself, or others. Based on the facts of the incident as presented to ODO, the officer could have contacted his Sergeant for guidance at the onset, rather than enter the housing unit. During incidents where there is no immediate threat, time should be taken to assess and potentially resolve the situation without resorting to force, thereby avoiding the risk of potential harm to the detainee and personnel.

INSPECTION PROCESS

ODO inspections evaluate the welfare, safety, and living conditions of detainees. ODO primarily focuses on areas of noncompliance with the ICE NDS or the ICE Performance-Based National Detention Standards, as applicable. The ICE NDS apply to WCDF. In addition, ODO may focus its inspection based on detention management information provided by ERO Headquarters and ERO field offices, and on issues of high priority or interest to ICE executive management.

ODO reviewed the processes employed at WCDF to determine compliance with policies and detention standards. Prior to the inspection, ODO collected and analyzed relevant allegations and detainee information from multiple ICE databases, including the Joint Integrity Case Management System, the ENFORCE Alien Booking Module, and the ENFORCE Alien Removal Module. ODO also gathered facility facts and inspection-related information from ERO Headquarters staff to prepare for the site visit at WCDF.

REPORT ORGANIZATION

This report documents inspection results, serves as an official record, and is intended to provide ICE and detention facility management with a comprehensive evaluation of compliance with policies and detention standards. It summarizes those NDS that ODO found deficient in at least one aspect of the standard. ODO reports convey information to best enable prompt corrective actions and to assist in the on-going process of incorporating best practices in nationwide detention facility operations.

OPR defines a deficiency as a violation of written policy that can be specifically linked to the NDS, ICE policy, or operational procedure. When possible, the report includes contextual and quantitative information relevant to the cited standard. Deficiencies are highlighted in bold throughout the report and are encoded sequentially according to a detention standard designator.

Comments and questions regarding the report findings should be forwarded to the Deputy Division Director, OPR ODO.

INSPECTION TEAM MEMBERS



Management and Program Analyst (Team Leader)	ODO, Headquarters
Detention and Deportation Officer	ODO, Headquarters
Contract Inspector	Creative Correction

OPERATIONAL ENVIRONMENT

INTERNAL RELATIONS

ODO interviewed supervisory ICE and WCDF personnel, including WCDF's Jail Administrator, captains, lieutenants, and sergeants. ODO interviewed ERO personnel including the Assistant Field Office Director, a Supervisory Detention and Deportation Officer, a Supervisory Immigration Enforcement Agent, a Deportation Officer, and an Immigration Enforcement Agent.

During the interviews, ERO and WCDF leadership stated the working relationship between the two entities is excellent, and morale among ERO and WCDF personnel is high. The Jail Administrator stated he consistently observes ICE personnel visiting the housing units weekly, and communicating with ICE detainees to address their issues and concerns. The Jail Administrator stated WCDF is adequately staffed to manage the current detainee population. The Supervisory Detention and Deportation Officer and the Supervisory Immigration Enforcement Agent both stated ICE staffing is adequate for the current detainee population.

DETAINEE RELATIONS

ODO interviewed 12 randomly-selected male detainees from all classification levels to assess the overall conditions of detention at WCDF. The length of stay for these detainees ranged from two months to one year. None of the detainees expressed concerns about admission, medical and dental care, personal hygiene items, the law library, grievance procedures, recreation or their communication with ICE and WCDF personnel. All 12 detainees stated they knew the name of their Deportation Officers.

None of the detainees had yet filed grievances during their stays and denied having ever witnessed any abuse, force, or racial statements from WCDF officers during their periods of detention.

All 12 detainees complained about the cost of telephone calls and phone reception. ODO checked all telephones in the detainee housing areas and found they were in good working order. The Immigration Enforcement Agent completes weekly inspections of the telephones and notes any serviceability issues.

Among the 12 detainees, several expressed concerns about other detention conditions. Two detainees interviewed claimed they were not issued a facility detainee handbook; however, review of their detention files revealed they signed acknowledgment receipts for the facility handbook. Three detainees complained about video conference visitation, because they cannot see family and friends in person. One detainee alleged he was strip searched and denied a handbook during admission. ODO reviewed the detainee's file and interviewed WCDF personnel, but found no information supporting the detainee's allegations. Three detainees complained about small food portions. Two detainees alleged meals contained synthetic meat and lacked vegetables and fruit.

ODO sampled a meal, and found food items and portions were in accordance with the menu, and were served at the appropriate temperatures. The menu is certified by a registered dietitian based

on a complete nutritional analysis of the master cycle menu, and religious and medical diets are provided in accordance with the NDS standard.

WCDF provides elective classes for detainees in English as a Second Language, life skills, and anger management. These classes are well-received by the detainee population, and promote positive interactions between personnel and detainees. ODO cites the availability of these classes as a positive practice.

ICE NATIONAL DETENTION STANDARDS

ODO reviewed a total of 23 ICE NDS and found WCDF fully compliant with the following 18 standards:

- Access to Legal Material
- Detainee Handbook
- Disciplinary Policy
- Emergency Plans
- Food Service
- Funds and Personal Property
- Hold Rooms in Detention Facilities
- Hunger Strikes
- Medical Care
- Recreation
- Religious Practices
- Special Management Unit (Administrative Segregation)
- Special Management Unit (Disciplinary Segregation)
- Suicide Prevention and Intervention
- Telephone Access
- Terminal Illness, Advance Directives, and Death
- Use of Force
- Visitation

As these standards were compliant at the time of the review, a synopsis for these standards was not prepared for this report.

ODO found deficiencies in the following five areas:

- Admission and Release
- Detainee Grievance Procedures
- Detention Files
- Environmental Health and Safety
- Staff-Detainee Communication

Findings for each of these standards are presented in the remainder of this report.

ADMISSION AND RELEASE (AR)

ODO reviewed the Admission and Release standard at WCDF to determine if procedures are in place to protect the health, safety, security, and welfare of each person during the admission and release process, in accordance with the ICE NDS. ODO reviewed policies, procedures, and detention files; observed admission and intake procedures; and interviewed staff and detainees.

The admissions process at WCDF involves multiple steps, including general and medical screenings, classification determinations, property inventory and showers, and orientation to the facility. Nurses in the medical care unit complete detailed medical, dental, mental health, and sexual abuse history screenings. Orientation is provided through a video available to detainees in both the English and Spanish languages.

ODO found incoming ICE detainees are not strip searched without reasonable suspicion of contraband possession. WCDF's written policy on strip searches is compliant with the ICE Change Notice, National Detention Standard Strip Search Policy, dated October 15, 2007. Most detainee interviews corroborated ODO's finding, except for one detainee who alleged two WCDF officers watched him change into a facility uniform, and he did not receive a handbook. ODO reviewed documentation in the detainee's detention file and found no information substantiating the allegations. The intake processing record contained no mention of officers observing the detainee's clothing exchange, and ODO found the detainee signed the property receipt form when he received the detainee handbook.

ODO found intake officers create detention files for each newly admitted detainee. New files are activated on the facility's computer system, known as Smart Cop, through creation of the booking identification number. Review of 15 active and 15 inactive detention files showed not all of the required forms and documents associated with the admissions process were maintained. ODO also observed the Order to Detain or Release Detainee, Form I-203, accompanied each newly-arrived detainee to WCDF, and was scanned into the electronic file for each detainee. WCDF personnel provided a separate folder, which contained copies of Form I-203. ODO advised WCDF personnel to maintain copies of Form I-203 in each detainee's detention file.

The NDS requires a Report of Detainee's Missing Property, Form I-387, to be available in the intake processing area, and completed when a new detainee claims his or her property has been lost or left behind. ODO found WCDF does not maintain copies of Form I-387 in the intake processing area (**Deficiency AR-1**), and does not require the form to be completed when a detainee reports property was missing or has been left behind in another facility.

STANDARD/POLICY REQUIREMENTS FOR DEFICIENT FINDINGS

DEFICIENCY AR-1

In accordance with the ICE NDS, Admission and Release, section (III)(I), the FOD must ensure the officer shall complete a Form I-387, "Report of Detainee's Missing Property" when any newly arrived detainee claims his/her property has been lost or left behind. IGSA facilities shall forward the completed I-387s to INS.

DETAINEE GRIEVANCE PROCEDURES (DGP)

ODO reviewed the Detainee Grievance Procedures standard at WCDF to determine if a process to submit formal or emergency grievances exists, and responses are provided in a timely manner, without fear of reprisal. In addition, the review was conducted to determine if detainees have an opportunity to appeal responses, and if accurate records are maintained, in accordance with the ICE NDS. ODO interviewed staff and reviewed the grievance policy, procedures, records, and the detainee handbook.

ODO found WCDF's grievance system allows detainees to file formal and informal grievances, and forms are available upon request. Minor grievances are resolved informally and the resolutions documented. Assistance in filing grievances is available, if needed, through language interpretation and translation services, and by facility personnel who may speak in a language the detainee can understand. Detainees are encouraged to resolve grievances informally, but may pursue formal grievances. All grievances are recorded in a logbook, and processed by the Grievance Officer until resolution, normally within 24 hours. The appeal process is available for detainees who are unsatisfied with the facility's decision.

ODO reviewed 27 grievances filed by ICE detainees from January 2012 through February 2013. Thirteen grievances related to facility rules based on officers not permitting detainees to stay up at night; four were related to small food portions; and three grievances each related to medical, mail, and telephones. ODO found the grievances regarding the facility's rules were resolved within 24 hours. Medical grievances are submitted to medical personnel, and the completed forms are kept in the detainee's medical record. ODO observed the three medical-related grievances were resolved by the Health Service Administrator within 24 hours. Facility personnel stated ICE is notified of any medical grievances not immediately addressed by the facility medical personnel.

ODO noted WCDF does not have a written policy describing how to handle emergency grievances, ensuring detainees' safety and welfare (**Deficiency DGP-1**). Since this was a repeat deficiency from the March 2011 ODO QAR, ODO reiterated the grievance standard requires any officer who is approached by a detainee with an emergency grievance to report the grievance to supervisory personnel for immediate action.

WCDF personnel stated detention files do not contain grievances and corresponding dispositions (**Deficiency DGP-2**). ODO confirmed the missing documents were maintained in separate folders located in other departments throughout the facility. ODO informed staff during the inspection and at the closeout briefing that inserting completed grievances in each detainee's detention file would allow the facility and ICE personnel to recognize when detainees resort to filing repeated or nuisance grievances.

ODO noticed grievances pertaining to officer misconduct are not reported to ICE. Although allegations of misconduct may have been resolved by WCDF personnel and determined to be unfounded, the facility is still required to report all cases of misconduct to ICE (**Deficiency DGP-3**). ODO notified WCDF during the inspection and at the closeout briefing, any allegations of officer misconduct must be reported to ERO. ODO recommends WCDF report all instances of alleged misconduct to ICE prior to the resolution phase, if possible.

STANDARD/POLICY REQUIREMENTS FOR DEFICIENT FINDINGS

DEFICIENCY DGP-1

In accordance with the ICE NDS, Detainee Grievance Procedures, section (III)(B), the FOD must ensure each facility shall implement procedures for identifying and handling an emergency grievance. An emergency grievance involves an immediate threat to a detainee's safety or welfare. Once the receiving staff member approached by a detainee determines that he/she is in fact raising an issue requiring urgent attention, emergency grievance procedures will apply.

DEFICIENCY DGP-2

In accordance with the ICE NDS, Detainee Grievance Procedures, section (III)(E), the FOD must ensure a copy of the grievance will remain in the detainee's detention file for at least three years. The facility will maintain that record for a minimum of three years and subsequently, until the detainee leaves INS custody.

DEFICIENCY DGP-3

In accordance with the ICE NDS, Detainee Grievance Procedures, section (III)(F), the FOD must ensure staff must forward all detainee grievances containing allegations of officer misconduct to a supervisor or higher-level official in the chain of command. CDFs and IGSA facilities must forward detainee grievances alleging officer misconduct to INS. INS will investigate every allegation of officer misconduct.

DETENTION FILES (DF)

ODO reviewed the Detention Files standard at WCDF to determine if files are created containing all significant information on detainees housed at the facility for over 24 hours, in accordance with the ICE NDS. ODO toured the admissions and release area and property room, interviewed staff, and reviewed detention files, logbooks, policies, and procedures.

WCDF personnel create and activate a detention file for each detainee as part of the admissions process. According to WCDF personnel, all documents are scanned into folders maintained in the computer system (known as Smart Cop), and the physical files are kept in a secure file room located in close proximity to the intake processing area. During intake processing, the Smart Cop generates the booking identification number used to track activities while a detainee is in custody.

WCDF personnel stated that access to detention files is restricted to officers in the intake processing area, therefore eliminating the need for maintaining a log or tracking mechanism (**Deficiency DF-1**). The NDS requires the facility to maintain a logbook to monitor the removal of detention files from the file storage area.

ODO interviewed ERO personnel regarding the maintenance of detention files for all detainees housed at WCDF. ERO personnel stated detention files are not maintained at the ERO field office for each detainee housed at WCDF. The NDS requires detention file documents from each detention file to be forwarded to the ICE field office of jurisdiction (**Deficiency DF-2**).

ODO determined WCDF's electronic file maintenance complies with the standard. According to WCDF personnel, since the computer system contains the scanned back-up documents, detention files are shredded following the detainee's release. ODO recommends all paperwork generated during detention, including, but not limited to detainee requests, disciplinary forms, and grievance forms, be maintained on-file (paper or electronic) for the required period of time specified in the NDS.

STANDARD/POLICY REQUIREMENTS FOR DEFICIENT FINDINGS

DEFICIENCY DF-1

In accordance with the ICE NDS, Detention Files, section (III)(F), the FOD must ensure:

1. All staff may have access to the detention file.
2. Staff shall accommodate all requests for detainee detention files from other departments, which may need the material for disciplinary hearings or other proceedings. A representative of the department requesting the file is responsible for obtaining the file, logging it out, and ensuring its return.

Unless the CDEO or equivalent determines otherwise, borrowed file(s) shall be returned by the end of the administrative workday.

At a minimum, a logbook entry recording the file's removal from the cabinet will include:

- a. The detainee's name and A-File number;
- b. Date and time removed;

- c. Reason for removal;
- c. Signature of person removing the file, including title and department;
- d. Date and time returned; and
- e. Signature of person returning the file.

DEFICIENCY DF- 2

In accordance with the ICE NDS, Detention Files, section (IV), the FOD must ensure the field office with IGSA-facility jurisdiction shall create and maintain detention files on all detainees admitted to IGSA facilities. These files shall contain the same material (forms and other documents) as SPC/CDF detention files to the extent possible, given that they are created by the field office. For example, if the field office takes and holds detainee property, the detention file shall contain the G-589's and I-77s. The file shall also contain copies of all I-203s and the G-385 related to the alien. The IGSA shall forward all documents relating to the individuals detention to the INS field office of jurisdiction for inclusion into the detention file.

ENVIRONMENTAL HEALTH AND SAFETY (EH&S)

ODO reviewed the Environmental Health and Safety standard at WCDF to determine if the facility maintains high standards of cleanliness and sanitation, safe work practices, and control of hazardous materials and substances, in accordance with the ICE NDS. ODO toured the facility, interviewed staff, and reviewed policies and documentation of inspections, hazardous chemical management, and fire drills.

ODO found sanitation was maintained at an acceptable level throughout the facility. WCDF has an established system for storing, issuing, and maintaining inventories of chemicals. The Quartermaster of the facility is assigned the responsibility of monitoring and maintaining the environmental safety and control program. ODO verified running inventories of hazardous substances are maintained, and corresponding Material Safety Data Sheets are available. A master file of Material Safety Data Sheets and index of hazardous substances is maintained in the Quartermaster's office, and identifies storage locations. WCDF personnel are provided training in the use of hazardous chemicals, safety procedures, self-contained breathing apparatus, and fire plans. A review of ten randomly-selected training records confirmed the staff completed this training. Protective gloves, aprons, and goggles are available and used when working with hazardous materials. Protocol requires immediate verbal reporting and subsequent written documentation of spills or other incidents involving hazardous materials.

A review of WCDF's Fire Prevention Plan, and Fire Response and Control Plan found them thorough and in compliance with the NDS. Monthly fire drills are conducted and documented separately in each department. Emergency key rings are drawn, and the time for responding to the area and unlocking an emergency door is recorded. Exit diagrams are posted throughout the facility and provide instructions in both the English and Spanish languages. By policy, WCDF personnel conduct daily fire safety, sanitation, security, and emergency equipment inspections throughout the facility. A review of documentation confirmed completion of required inspections. WCDF passed its September 2012 fire inspection conducted by the State of Florida.

WCDF's drinking and waste water are regularly tested in compliance with the standard. Weekly pest inspections are conducted by the Shift Lieutenant to monitor for pest infestation. WCDF is contracted with a local pest control company for monthly and as-needed eradication services. ODO did not observe any signs of pests or rodents within the facility.

WCDF has one main generator and two back-up generators. A computer-monitored test of the emergency electrical generator is conducted weekly for a 30-minute period, and reports are generated when a problem is detected. Though weekly testing exceeds the NDS requirement for bi-weekly testing, the test period of 30 minutes falls short of the required 60 minutes. In addition, WCDF does not have the generator tested by an external company on a quarterly basis as required by the standard. Full testing by an external generator service company is conducted only once a year (**Deficiency EH&S-1**). As emergency generators serve a vital life-safety function in the event of a power outage, prescribed preventive maintenance and testing is essential. Prior to completion of the review, WCDF personnel indicated they initiated corrective action to meet the requirements of the standard.

WCDF has a separate room dedicated for barber services. Inspection confirmed both hot and cold water is available, and the appropriate equipment is provided for maintaining sanitary procedures of hair care. Detailed sanitation regulations are posted.

ODO reviewed procedures for the handling and disposal of used needles and other potentially sharp objects in the health services unit. In addition, general environmental health guidelines and cleaning procedures for the area were reviewed. All requirements of the NDS were met.

STANDARD/POLICY REQUIREMENTS FOR DEFICIENT FINDINGS

DEFICIENCY EH&S-1

In accordance with the ICE NDS, Environmental Health and Safety, section (III)(O), the FOD must ensure power generators will be tested at least every two weeks. Other emergency equipment and systems will undergo quarterly testing, with follow-up repairs or replacement as necessary.

The biweekly test of the emergency electrical generator will last one hour. During that time, the oil, water, hoses and belts will be inspected for mechanical readiness to perform in an emergency situation. The emergency generator will also receive quarterly testing and servicing from an external generator-service company. Among other things, the technicians will check starting battery voltage, generator voltage and amperage output.

STAFF-DETAINEE COMMUNICATION (SDC)

ODO reviewed the Staff-Detainee Communication standard at WCDF to determine if procedures are in place to allow formal and informal contact between detainees and key ICE and facility personnel; and if ICE detainees are able to submit written requests to ICE personnel and receive timely responses, in accordance with the ICE NDS. ODO interviewed personnel and detainees, and reviewed ERO logbooks and the Facility Liaison Visit checklists.

ICE personnel conduct scheduled and unscheduled visits throughout the week at WCDF to address detainee requests and concerns. These visits are documented on the ICE Facility Liaison Visit Checklist maintained at the ERO Tallahassee Sub-Office. ODO reviewed the checklists and found detainees have the opportunity to submit written questions, requests, or concerns to ERO personnel via a request form. Detainee request forms are available upon request in each housing unit.

ODO reviewed detention files and interviewed ERO personnel and detainees concerning the ICE request process. ODO found request forms are available from corrections officers. The logbook associated with these requests indicated responses are provided within the required 72 hours. ERO personnel stated the forms are maintained in their offices rather than in detainee detention files, as required (**Deficiency SDC-1**). This is a repeat deficiency from the March 2011 ODO QAR.

STANDARD/POLICY REQUIREMENTS FOR DEFICIENT FINDINGS

DEFICIENCY SDC-1

In accordance with the ICE NDS, Staff-Detainee Communication, section (III)(B)(2), the FOD must ensure all completed Detainee Requests will be filed in the detainee's detention file and will remain in the detainee's detention file for at least three years.