



U.S. Department of Homeland Security
U.S. Immigration and Customs Enforcement
Office of Professional Responsibility
Inspections and Detention Oversight Division
Washington, DC 20536-5501

Office of Detention Oversight
Unannounced Compliance Inspection
Enforcement and Removal Operations
ERO Houston Field Office
Limestone County Detention Center
Groesbeck, Texas
October 26-28, 2021

**UNANNOUNCED COMPLIANCE INSPECTION
of the
LIMESTONE COUNTY DETENTION CENTER
Groesbeck, Texas**

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FACILITY OVERVIEW

The U.S. Immigration and Customs Enforcement (ICE) Office of Professional Responsibility (OPR) Office of Detention Oversight (ODO) conducted an unannounced compliance inspection of the Limestone County Detention Center (LCDC) in Groesbeck, Texas, from October 26 to 28, 2021.¹ The facility opened in 1990 and is owned by Limestone County and operated by LaSalle Corrections. The ICE Office of Enforcement and Removal Operations (ERO) began housing detainees at LCDC in 2019 under the oversight of ERO’s Field Office Director in ERO San Antonio; however, the facility has been under the oversight of ERO Houston since October 1, 2021. The facility operates under the National Detention Standards (NDS) 2000.

ERO has not assigned deportation officers nor a detention services manager to the facility. A warden handles daily facility operations and manages [REDACTED] support personnel. LaSalle Corrections provides food services and medical care, and Correct Commissary provides commissary services at the facility. The facility does not hold any accreditations from outside entities.

Capacity and Population Statistics	Quantity
ICE Bed Capacity ²	[REDACTED]
Average ICE Population ³	[REDACTED]
Adult Male Population (as of October 26, 2021)	[REDACTED]
Adult Female Population (as of October 26, 2021)	[REDACTED]

During its last inspection, in Fiscal Year (FY) 2021, ODO found 25 deficiencies in the following areas: Admission & Release (4); Environmental Health and Safety (20); and Medical Care (1).

¹ This facility holds male detainees with security classification levels for periods greater than 72 hours.

² Data Source: ERO Facility List as of September 27, 2021.

³ *Ibid.*

UNANNOUNCED COMPLIANCE INSPECTION PROCESS

ODO conducts oversight inspections of ICE detention facilities with an average daily population (ADP) greater than 10, and where detainees are housed for longer than 72 hours, to assess compliance with ICE national detention standards. These inspections focus solely on facility compliance with detention standards that directly affect detainee life, health, safety, and/or well-being.⁴

ODO identifies violations of ICE detention standards, ICE policies, or operational procedures, as "deficiencies." ODO highlights instances when the facility resolves deficiencies prior to completion of the ODO inspection. Where applicable, these corrective actions are annotated with "C" under the *Compliance Inspection Findings* section of this report.

In FY 2022, ODO began conducting on-site focused reviews of under 72-hour ICE detention facilities with an ADP of 1 or more detainees, and over 72-hour ICE detention facilities with an ADP of 1 to 9 detainees. Additionally, ODO began conducting on-site unannounced compliance inspections of ICE detention facilities, regardless of the ADP, as well as reviews of ICE special and/or emerging detention facilities/programs.

Upon completion of each unannounced compliance inspection, ODO conducts a closeout briefing with facility and local ERO officials to discuss preliminary findings. A summary of these findings is shared with ERO management officials. Thereafter, ODO provides ICE leadership with a final compliance inspection report to: (i) assist ERO in developing and initiating corrective action plans; and (ii) provide senior executives with an independent assessment of facility operations. ODO's findings inform ICE executive management in its decision-making to better allocate resources across the agency's entire detention inventory.

⁴ ODO reviews the facility's compliance with selected standards in their entirety.

FINDINGS BY NATIONAL DETENTION STANDARDS (NDS) 2000 MAJOR CATEGORIES

NDS 2000 Standards Inspected ^{5,6}	Deficiencies
Part 1 - Detainee Services	
Food Service	0
Issuance and Exchange of Clothing, Bedding and Towels	0
Sub-Total	0
Part 2 - Security and Control	
Environmental Health and Safety	21
Post Orders	0
Special Management Unit (Administrative Segregation)	0
Use of Force	0
Sub-Total	21
Part 3 - Health Services	
Hunger Strikes	0
Medical Care	0
Suicide Prevention and Intervention	0
Sub-Total	0
Other Standards Reviewed	
Sexual Abuse and Assault Prevention and Intervention (NDS 2019)	0
Sub-Total	0
Total Deficiencies	21

⁵ For greater detail on ODO's findings, see the *Compliance Inspection Findings* section of this report.

⁶ Special reviews and unannounced inspections are both focused reviews and ODO will review a facility's compliance with at least 10 individual standards during each special review or unannounced inspection.

DETAINEE RELATIONS

ODO interviewed 13 detainees, who each voluntarily agreed to participate. None of the detainees made allegations of discrimination, mistreatment, or abuse. Most detainees reported satisfaction with facility services except for the concern listed below.

Medical Care: One detainee stated his father, who was also a detainee at the facility, was suffering from severe knee pain. The pain caused loss of sleep for his father who needed medical attention.

- Action Taken: ODO reviewed the father's medical file and found that on October 26, 2021, the facility's medical provider examined him for his knee pain. The provider issued him a compression wrap, prescribed pain medication, and ordered an X-ray. The facility's medical staff scheduled the detainee for a follow-up appointment with the medical provider on November 17, 2021, and advised him to return to the medical unit, if his condition worsened.

UNANNOUNCED COMPLIANCE INSPECTION FINDINGS

SECURITY AND CONTROL

ENVIRONMENTAL HEALTH AND SAFETY (EHS)

ODO interviewed the fire safety officer (FSO), toured [REDACTED] detainee housing units, and found six spray bottles containing toxic and caustic materials (bleach) stored in unsecured areas and in containers other than the original containers with the manufacturer labels (**Deficiency EHS-34**⁷).

ODO toured the facility, interviewed the FSO, and found detainees did not properly clean and disinfect hair clippers after each use. Specifically, detainees received barber kits from unit officers for personal use and they returned the barber kits to the unit officers for cleaning and disinfection after the detainees finished using the hair clippers (**Deficiency EHS-83**⁸). **This is a repeat deficiency.**

ODO toured the facility, interviewed the FSO, and found the facility did not have a separate room for a barber shop. Specifically, detainees received barber kits and cut their own hair in the housing units (**Deficiency EHS-84**⁹). **This is a repeat deficiency.**

Corrective Action: On November 9, 2021, LCDC provided ODO with photographs of a newly constructed and operational barbershop located in a separate, single-purpose room (**C-1**).

⁷ "All toxic and caustic materials must be stored in secure areas, in their original containers, with the manufacturer's label intact on each container." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(G)(1).

⁸ "Instruments such as combs and clippers will not be used successively on detainees without proper cleaning and disinfecting." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P).

⁹ "The operation will be located in a separate room not used for any other purpose." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

Since the facility did not have a barber shop, ODO cited the following deficiencies:

- The facility did not have a smooth, nonabsorbent, and easily cleaned floor for barber operations (**Deficiency EHS-85¹⁰**). **This is a repeat deficiency.**

Corrective Action: On November 9, 2021, LCDC provided ODO with photographs of a newly constructed barbershop that appeared to have a smooth, nonabsorbent, and easily cleaned floor (C-2).

- The facility's walls and ceilings were not in good repair nor painted a light color for barber operations (**Deficiency EHS-86¹¹**). **This is a repeat deficiency.**

Corrective Action: On November 9, 2021, LCDC provided ODO with photographs of a newly constructed barbershop that appeared to be in good repair and was painted in a light color (C-3).

- The facility did not have artificial lighting of at least 50-foot candles for barber operations (**Deficiency EHS-87¹²**). **This is a repeat deficiency.**

Corrective Action: On November 9, 2021, LCDC provided ODO with photographs of a newly constructed barbershop, which provided artificial lighting for barber operations (C-4).

- The facility did not have mechanical ventilation that provided 5 air changes per hour for barber operations (**Deficiency EHS-88¹³**). **This is a repeat deficiency.**

Corrective Action: On November 9, 2021, LCDC provided ODO with photographs of a newly constructed barbershop, which included a mechanical ventilation system (C-5).

¹⁰ "The floor will be smooth, nonabsorbent and easily cleaned." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

¹¹ "Walls and ceiling will be in good repair and painted a light color." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

¹² "Artificial lighting of at least 50-foot candles will be provided." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

¹³ "Mechanical ventilation of 5 air changes per hour will be provided if there are no operable windows to provide fresh air." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

- The facility did not provide at least one lavatory for barbershop operations (**Deficiency EHS-89¹⁴**). **This is a repeat deficiency.**

Corrective Action: On November 9, 2021, LCDC provided ODO with photographs of a newly constructed barbershop, which included a lavatory (C-6).

- The facility did not have hot and cold water available for barbershop operations (**Deficiency EHS-90¹⁵**). **This is a repeat deficiency.**

Corrective Action: On November 9, 2021, LCDC provided ODO with photographs of a newly constructed barbershop, which showed the facility had plumbed hot and cold water to the barber shop (C-7).

- The facility did not have all equipment and facilities necessary for maintaining the sanitary procedures of hair care (**Deficiency EHS-91¹⁶**). **This is a repeat deficiency.**

Corrective Action: On November 9, 2021, LCDC provided ODO with photographs of a newly constructed barbershop, which had the necessary equipment available for the sanitary procedures of hair care (C-8).

- The facility did not have appropriate cabinets, covered metal containers for waste, disinfectants, dispensable headrest covers, laundered towels, nor haircloths for barbershop operations (**Deficiency EHS-92¹⁷**). **This is a repeat deficiency.**

Corrective Action: On November 9, 2021, LCDC provided ODO with photographs of a newly constructed barbershop, which included appropriate cabinets, metal containers, disinfectants, dispensable headrest covers, and laundered towels for barbershop operations (C-9).

- The facility did not clean nor effectively disinfect all hair care tools between the use of each detainee. Specifically, the detainees received barber kits from the facility for use on multiple detainees and returned the kits for cleaning and disinfecting (**Deficiency EHS-93¹⁸**). **This is a repeat deficiency.**

¹⁴ "At least one lavatory will be provided." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

¹⁵ "Both hot and cold water will be available, and the hot water will be capable of maintaining a constant flow of water between 105 degrees and 120 degrees." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(1).

¹⁶ "Each barbershop will be provided with all equipment and facilities necessary for maintaining sanitary procedures of hair care." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(2).

¹⁷ "Each shop will be provided with appropriate cabinets, covered metal containers for waste, disinfectants, dispensable headrest covers, laundered towels and haircloths." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(2).

¹⁸ "Between detainees, all hair care tools coming in contact with the detainees will be cleaned and effectively disinfected." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(3).

- The facility did not post detailed hair care sanitation regulations in a conspicuous location for the use of all hair care personnel and detainees (**Deficiency EHS-95¹⁹**). **This is a repeat deficiency.**

Additionally, because the facility did not post detailed sanitation rules, ODO found the facility does not inform detainees to:

- Wash scissors, combs, and other tools with soap and hot water before use on each detainee (**Deficiency EHS-96²⁰**). **This is a repeat deficiency.**
- Immerse clipper blades in a disinfectant solution before use on each detainee (**Deficiency EHS-97²¹**). **This is a repeat deficiency.**
- Refrain from using headrest covers, neck straps, towels, and washcloths that other detainees have used, unless they have been properly laundered (**Deficiency EHS-99²²**). **This is a repeat deficiency.**
- Refrain from making shaving lather in a wash basin or lavatory (**Deficiency EHS-104²³**). **This is a repeat deficiency.**
- Refrain from removing or treating blackheads, carbuncles, infected hairs, or any sores or lesions (**Deficiency EHS-106²⁴**). **This is a repeat deficiency.**
- Refrain from pulling hair from ears, nostrils, eyebrows, and moustaches (**Deficiency EHS-107²⁵**). **This is a repeat deficiency.**
- Refrain from serving any detainee with inflamed, scaling, pus-filled, or erupted skin (**Deficiency EHS-108²⁶**). **This is a repeat deficiency.**

¹⁹ "Each barbershop will have detailed hair care sanitation regulations posted in a conspicuous location for the use of all hair care personnel and detainees" *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4).

²⁰ "All scissors, combs or other tools (except clippers) will be thoroughly washed with soap and hot water to remove film and debris and effectively disinfected immediately after use on each detainee and before being used for the service of any other detainee" *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(a).

²¹ "After cleaning, the clipper blades will be immersed in the disinfectant solution and agitated for a period of not less than 15 seconds before use on any other detainee. The solution will be replaced as often as necessary." *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(b).

²² "No hair care specialist will use for the service of a detainee any headrest cover, neck strap, towel, or washcloth that has been used for any other detainee, unless the same will have been properly laundered since its last use." *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(c).

²³ "The making of shaving lather in a wash basin or lavatory for use in serving a detainee is prohibited." *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(g).

²⁴ "The removal or treatment of blackheads, carbuncles, infected hairs, or any sores or lesions is prohibited." *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(i).

²⁵ "The pulling of hair from ears, nostrils, eyebrows, and mustaches is prohibited." *See* ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(j).

²⁶ "No barber or beautician will serve any detainee when the skin of the detainee's face, neck, or scalp is inflamed,

- Refrain from serving any detainee infested with head lice (**Deficiency EHS-109²⁷**). **This is a repeat deficiency.**

Corrective Action: On November 9, 2021, LCDC provided ODO with documentation and photographs of a newly constructed barbershop with conspicuously posted and detailed hair care sanitation regulations (**C-10**).

OTHER STANDARDS INSPECTED

SEXUAL ABUSE AND ASSAULT PREVENTION AND INTERVENTION (SAAPI) (NDS 2019²⁸)

ODO reviewed the facility's SAAPI policy and found the facility's policy did not specifically indicate their requirement to cooperate with all ICE SAAPI audits and monitoring of the facility's compliance with sexual abuse and assault policies and standards. The facility's contract does not include the NDS 2019 SAAPI standard; therefore, ODO cited this as an **Area of Concern**.

Corrective Action: On October 28, 2021, prior to the completion of this inspection, LCDC provided ODO with an updated version of its SAAPI policy including the facility's requirement to cooperate with all ICE audits and monitoring of facility compliance with sexual abuse and assault policies and standards (**C-11**).

ODO reviewed the facility's written procedures for administrative investigations and found the policy did not include a provision requiring the review of prior complaints and reports of sexual abuse and assault of a suspected perpetrator. The facility's contract does not include the NDS 2019 SAAPI standard; therefore, ODO cited this as an **Area of Concern**.

Corrective Action: On October 28, 2021, prior to the closeout of this inspection, LCDC provided ODO with an updated version of its SAAPI policy including a provision requiring a review of prior complaints and reports of sexual abuse and assault of a suspected perpetrator (**C-12**).

ODO reviewed the facility's written procedures for administrative investigations and found the policy did not include a provisions for assessing credibility of an alleged victim, suspect, or witness without regard to an individual's status as detainee, staff or employee and without requiring any detainee who alleges sexual abuse and assault to submit to a polygraph. The facility's contract does not include the NDS 2019 SAAPI standard; therefore, ODO cited this as an **Area of Concern**.

Corrective Action: On October 28, 2021, prior to the closeout of this inspection, LCDC provided ODO with an updated version of its SAAPI policy including provisions for the

scaling, contains pus, or is erupted, unless service of such detainee is performed in accordance with the specific authorization of the Chief Medical Officer." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(k).

²⁷ "No person will be served when infested with head lice." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(P)(4)(i).

²⁸ LCDC is not contractually obligated to comply with the NDS 2019 SAAPI standard. ODO cited all findings in SAAPI as Areas of Concern.

assessment of the credibility of an alleged victim, suspect, or witness, without regard to the individual’s status as detainee, staff, or employee, and without requiring any detainee who alleges sexual abuse and assault to submit to a polygraph (C-13).

ODO reviewed the facility's written procedures for administrative investigations and found the policy did not contain a provision requiring the retention of reports for as long as the facility detains the alleged abuser or the facility or agency employs the alleged abuser, plus 5 years. The facility’s contract does not include the NDS 2019 SAAPI standard; therefore, ODO cited this as an **Area of Concern**.

Corrective Action: On October 28, 2021, prior to the closeout of this inspection, LCDC provided ODO with an updated version of its SAAPI policy, which now requires the facility to retain reports for as long as the alleged abuser is detained or employed by the agency or facility, plus five years (C-14).

CONCLUSION

During this inspection, ODO assessed the facility's compliance with 10 standards under NDS 2000 and 1 standard under NDS 2019 and found the facility in compliance with 9 of those standards. ODO found 21 deficiencies in the remaining standard. ODO commends facility staff members for their responsiveness during this inspection and notes 14 instances in which the facility initiated corrective action, to include building a barber shop on-site to address the repeat deficiencies. ODO recommends ERO Houston work with the facility to resolve any deficiencies that remain outstanding in accordance with contractual obligations. ERO provided ODO with the uniform corrective action plan for ODO’s last inspection of SDC on October 19, 2021.

Compliance Inspection Results Compared	FY 2021 (NDS 2000)/ (NDS 2019)	FY 2022 (NDS 2000)/ (NDS 2019)
Standards Reviewed	12/1	9/1
Deficient Standards	3	1
Overall Number of Deficiencies	25	21
Repeat Deficiencies	N/A	20
Areas Of Concern	0	4
Corrective Actions	0	14
Facility Rating	N/A	Acceptable