

Office of Professional Responsibility

Oldham County Jail Inspection 2024-003-423

September 17-19, 2024



U.S. Immigration
and Customs
Enforcement



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

Office of Detention Oversight
Special Review
2024-003-423

Enforcement and Removal Operations
ERO Chicago Field Office

Oldham County Jail
La Grange, Kentucky

September 17-19, 2024

Amended report as of February 18, 2025.

This report has been amended due to ERO Chicago providing ODO with additional documentation after ODO's on-site visit, resolving ODO's findings for Sexual Abuse and Assault Prevention and Intervention, Environmental Health and Safety, and Hunger Strikes demonstrating the facility's compliance with those line items. No other changes were made to this report.

SPECIAL REVIEW
of the
OLDHAM COUNTY JAIL
La Grange, Kentucky

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ODO

ODO

Creative Corrections

Creative Corrections

FACILITY OVERVIEW

The U.S. Immigration and Customs Enforcement (ICE) Office of Professional Responsibility (OPR) Office of Detention Oversight (ODO) conducted a special review of the Oldham County Jail (OCJ) in La Grange, Kentucky, from September 17 to 19, 2024.¹ The facility opened in January 2018 and is owned and operated by Oldham County. The ICE Office of Enforcement and Removal Operations (ERO) began housing detainees at OCJ in 1997 under the oversight of ERO's Field Office Director in Chicago (ERO Chicago). ICE is an authorized user of this facility under a United States Marshals Service Intergovernmental Agreement contract, which does not specify an ICE National Detention Standard (NDS), and ODO inspected to the NDS listed on the ERO Custody Management Division Authorized Facility List as of September 16, 2024. OCJ was inspected against the NDS 2019, and ODO's assigned rating is for ERO's informational purposes only.

██████████ A jailer handles daily facility operations and manages ██████ support personnel. Kellwell provides food and commissary services, and Southern Health Partners provides medical care at the facility. The facility does not hold any accreditations from any outside entities.

Capacity and Population Statistics	Quantity
ICE Bed Capacity ²	██████████
Average ICE Population ³	██████████
Adult Male Population (as of September 17, 2024)	██████████
Adult Female Population (as of September 17, 2024)	██████████

During its last rated inspection, in Fiscal Year (FY) 2023, ODO found 13 deficiencies in the following areas: Environmental Health and Safety (12) and Food Service (1).

¹ This facility holds male and female detainees with low, medium-low, medium-high, and high security classification levels for periods less than 72 hours.

² Data Source: ERO Custody Management Division Authorized Facility List as of September 16, 2024.

³ *Ibid.*

SPECIAL REVIEW PROCESS

ODO conducts oversight inspections of ICE detention facilities with an average daily population (ADP) of 10 or more, and where detainees are housed for over 72 hours, to assess compliance with ICE national detention standards. While these inspections focus on facility compliance with detention standards that directly affect detainee life, health, safety, and/or well-being, in FY 2024 ODO added additional standards to the scope of each full inspection to ensure ODO inspects every standard at each facility at least once every other year.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 special 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 unannounced inspections of ICE detention facilities, regardless of ADP of detainees, as well as reviews of ICE special/emerging detention facilities/programs. As such, these facility inspections will result in an ODO Inspection Compliance Rating; however, for facilities that are not contractually obligated to an ICE NDS, those ratings will be for ERO’s informational purposes. ODO will conduct a complete review of several core standards, in accordance with the facility’s contractually required ICE NDS or in accordance with the ICE NDS listed in the current ERO Custody Management Division Authorized Facility List for facilities that are not contractually obligated to an ICE NDS, which may include but are not limited to Medical Care/Health Care, Medical Care (Women)/Health Care (Females), Significant Self-harm and Suicide Prevention and Intervention, Hunger Strikes, Food Service, Environmental Health and Safety, Special Management Units (SMU) or Hold Rooms (if the facility does not have an SMU), Use of Force and Restraints/Use of Physical Control Measures, and Sexual Abuse and Assault Prevention and Intervention.

Upon completion of each special review or unannounced 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 uniform corrective action plans (UCAPs); and (ii) provide senior executives with an independent assessment of facility operations. ODO’s findings inform ICE executive management in their 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 2019 MAJOR CATEGORIES

NDS 2019 Standards Inspected ^{5,6,7}	Deficiencies
Part 1 - Safety	
Environmental Health and Safety	0
Sub-Total	0
Part 2 - Security	
Use of Force and Restraints	0
Special Management Units	0
Sexual Abuse and Assault Prevention and Intervention	0
Sub-Total	0
Part 4 - Care	
Food Service	0
Hunger Strikes	0
Medical Care	1
Significant Self-Harm and Suicide Prevention and Intervention	0
Sub-Total	1
Part 5 - Activities	
Recreation	0
Sub-Total	0
Part 6 - Justice	
Detainee Handbook	0
Sub-Total	0
Total Deficiencies	1

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

⁶ Beginning in FY 2024, ODO instituted a process of rotating all standards every other year. As a result, some standards may not be present in all inspections.

⁷ During a special review, ODO will review a facility's compliance with at least 10 individual standards.

DETAINEE RELATIONS

ODO attempted to interview the one detainee the facility housed during the inspection, but he declined ODO's request for an interview.

SPECIAL REVIEW FINDINGS

CARE

MEDICAL CARE (MC)

ODO reviewed three detainee medical records, Oldham County Jail Policy "J.6.02 - Receiving and Intake Screening," and found in all three detainee records, the facility did not conduct new arrival tuberculosis screenings in accordance with the most current Centers for Disease Control and Prevention guidelines prior to being placed in general population (**Deficiency MC-18⁸**). **This is a priority component**

CONCLUSION

During this special review, ODO assessed the facility's compliance with 10 standards under NDS 2019 and found the facility in compliance with 9 of those standards. ODO found 1 deficiency in the remaining standard. Since OCJ's last special review in September 2023, the facility has trended upward. OCJ went from 2 deficient standards and 13 deficiencies in September 2023 to 1 deficient standard and 1 deficiency during this most recent special review. OCJ completed its UCAP for its last inspection in September 2023, which likely resolved several of the deficiencies ODO previously cited. ODO recommends ERO Chicago continue to work with the facility to resolve the deficiencies that remain outstanding in accordance with contractual obligations.

Compliance Inspection Results Compared	FY 2023 Special Review (NDS 2019)	FY 2024 Special Review (NDS 2019)
Standards Reviewed	9	10
Deficient Standards	2	1
Overall Number of Deficiencies	13	1
Priority Component Deficiencies	0	1
Repeat Deficiencies	N/A	0
Areas Of Concern	1	0
Corrective Actions	N/A	0
Facility Rating	Good	Superior

⁸ "All new arrivals shall receive tuberculosis (TB) screening in accordance with the most current Centers for Disease Control and Prevention (CDC) guidelines, including, but not limited to, CDC Guidelines for Correctional Facilities, prior to being placed in general population." See ICE NDS 2019, Standard, Medical Care, Section (II)(D)(1).



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