



**U.S. Department of Homeland Security**  
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Office of Professional Responsibility  
ICE Inspections  
Washington, DC 20536-5501

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**Office of Detention Oversight  
Compliance Inspection  
2023-001-059**

**Enforcement and Removal Operations  
ERO San Antonio Field Office**

**South Texas ICE Processing Center  
Pearsall, Texas**

**February 7-9, 2023**

**COMPLIANCE INSPECTION**  
**of the**  
**SOUTH TEXAS ICE PROCESSING CENTER**  
Pearsall, Texas

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## COMPLIANCE INSPECTION TEAM MEMBERS



Team Lead	ODO
Inspections and Compliance Specialist	ODO
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Contractor	Creative Corrections

## FACILITY OVERVIEW

The U.S. Immigration and Customs Enforcement (ICE) Office of Professional Responsibility Office of Detention Oversight (ODO) conducted a compliance inspection of the South Texas ICE Processing Center (STIPC) in Pearsall, Texas, from February 7 to 9, 2023.<sup>1</sup> The facility opened in 2005 and is owned and operated by The Geo Group, Inc. (GEO). The ICE Office of Enforcement and Removal Operations (ERO) began housing detainees at STIPC in 2005 under the oversight of ERO’s Field Office Director in San Antonio (ERO San Antonio). The facility operates under the Performance-Based National Detention Standards (PBNDS) 2011 (Revised 2016).

ERO has assigned deportation officers to the facility. A facility administrator handles daily operations and manages [REDACTED] support personnel. GEO provides food services, ICE Health Service Corps provides medical care, and Keefe Commissary provides commissary services at the facility. The facility does not hold any accreditations from any outside entities. In May 2021, STIPC was audited for the Department of Homeland Security (DHS) Prison Rape Elimination Act (PREA) and was DHS PREA certified.

Capacity and Population Statistics	Quantity
ICE Bed Capacity <sup>2</sup>	[REDACTED]
Average ICE Population <sup>3</sup>	[REDACTED]
Adult Male Population (as of February 7, 2023)	[REDACTED]
Adult Female Population (as of February 7, 2023)	[REDACTED]

During its last full inspection, in Fiscal Year (FY) 2022, ODO found five deficiencies in the following areas: Environmental Health and Safety (1); Staff-Detainee Communication (1); Medical Care (1); Grievance System (1); and Legal Rights Group Presentations (1).

<sup>1</sup> This facility holds both male and female detainees with low, medium-low, medium-high and high security classification levels for periods greater than 72 hours.

<sup>2</sup> Data Source: ERO Facility List as of February 7, 2023.

<sup>3</sup> *Ibid.*

## COMPLIANCE INSPECTION PROCESS

ODO conducts oversight inspections of ICE detention facilities with an average daily population of 10 or more, and where detainees are housed for over 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.<sup>4</sup>

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.

Upon completion of each 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 their decision-making to better allocate resources across the agency’s entire detention inventory.

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<sup>4</sup> ODO reviews the facility’s compliance with selected standards in their entirety.

## FINDINGS BY PERFORMANCE-BASED NATIONAL DETENTION STANDARDS 2011 (REVISED 2016) MAJOR CATEGORIES

PBNDs 2011 (Revised 2016) Standards Inspected <sup>5,6</sup>	Deficiencies
<b>Part 1 - Safety</b>	
Emergency Plans	0
Environmental Health and Safety	0
Transportation (by Land)	0
<b>Sub-Total</b>	<b>0</b>
<b>Part 2 - Security</b>	
Admission and Release	0
Custody Classification System	0
Contraband	0
Funds and Personal Property	0
Hold Rooms in Detention Facilities	0
Key and Lock Control	1
Sexual Abuse and Assault Prevention and Intervention	0
Special Management Units	0
Staff-Detainee Communication <sup>7</sup>	1
Tool Control	0
Use of Force and Restraints	0
<b>Sub-Total</b>	<b>2</b>
<b>Part 3 - Order</b>	
Disciplinary System	0
<b>Sub-Total</b>	<b>0</b>
<b>Part 4 - Care</b>	
Food Service	0
Medical Care	0
Medical Care (Women)	0
Significant Self-harm and Suicide Prevention and Intervention	0
Terminal Illness, Advance Directives and Death	0
Disability Identification, Assessment, and Accommodation	0
<b>Sub-Total</b>	<b>0</b>
<b>Part 5 - Activities</b>	

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

<sup>6</sup> Beginning in FY 2022, ODO instituted a process of rotating all standards on a 3-year basis. As a result, some standard components may not be present in all standards.

<sup>7</sup> ODO identified the deficiency cited under the Staff-Detainee Communication standard during a detainee interview and did not review the Staff-Detainee Communication standard in its entirety.

Correspondence and Other Mail	1
Recreation	0
Visitation	0
<b>Sub-Total</b>	<b>1</b>
<b>Part 6 - Justice</b>	
Detainee Handbook	0
<b>Sub-Total</b>	<b>0</b>
<b>Part 7 - Administration and Management</b>	
Staff Training	0
<b>Sub-Total</b>	<b>0</b>
<b>Total Deficiencies</b>	<b>3</b>

## DETAINEE RELATIONS

ODO interviewed 30 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 concerns listed below.

*Medical Care:* One detainee stated the facility provided him no medical services for pain caused by a rash on his back.

- Action Taken: ODO interviewed the facility health services administrator (HSA), reviewed the detainee's medical file, and found the detainee submitted a sick call request concerning a back rash on February 1, 2023. A STIPC registered nurse (RN) evaluated the detainee on the same day, examined the detainee's back rash, and prescribed hydrocortisone cream as treatment. The RN also educated the detainee on how to use the medicated cream and maintain proper hygiene to contain the rash and advised the detainee to return to sick call as needed. At ODO's request, STIPC medical staff re-evaluated the detainee's back on February 7, 2023, found the rash had not healed, treated his back with benzoyl peroxide, and prescribed a medication the detainee could keep on his person to use as needed. The staff advised the detainee to avoid picking or scratching the rash scab as part of his overall hygiene. On February 21, 2023, ODO followed up with the facility and confirmed the detainee had not returned to sick call since February 7, 2023, and medical staff scheduled a follow-up visit with him on February 23, 2023.

*Staff-Detainee Communication:* One detainee stated he never received a response to an ICE request he submitted on February 1, 2023.

- Action Taken: On February 7, 2023, ODO interviewed ERO San Antonio staff, reviewed ICE request logs, and found the detainee submitted an ICE request on February 1, 2023, asking for information concerning his immigration case. On February 7, 2023, ERO San Antonio staff replied to the detainee by email, and the detainee received the response via facility tablet. On February 8, 2023, ODO

confirmed ERO San Antonio staff replied to the request outside of the required response time and cited this as a deficiency in the *Staff-Detainee Communication* section of this report.

## COMPLIANCE INSPECTION FINDINGS

### SECURITY

#### KEY AND LOCK CONTROL (KLC)

ODO interviewed STIPC staff and reviewed training records, inventory logs, and key rings, and found no key covers for large security keys to prevent unauthorized persons from observing and duplicating them (**Deficiency KLC-11<sup>7</sup>**).

#### STAFF-DETAINEE COMMUNICATION (SDC)

ODO interviewed a detainee, reviewed an ICE request he submitted and the ICE detainee request log, and found ERO San Antonio staff did not respond in person nor in writing within 3 business days of receipt of the ICE request. Specifically, ERO San Antonio responded on February 7, 2023, to a case update request, submitted by the detainee on February 1, 2023 (**Deficiency SDC-16<sup>8</sup>**). **This is a repeat deficiency.**

### ACTIVITIES

#### CORRESPONDENCE AND OTHER MAIL (COM)

ODO reviewed the STIPC site-specific handbook and found no reference stating ERO San Antonio may use any identity documents, such as passports or birth certificates, in a detainee's possession as evidence against that detainee, or for other purposes authorized by law (**Deficiency COM-22<sup>9</sup>**).

*Corrective Action:* Prior to the conclusion of the inspection, on February 9, 2023, the facility updated the site-specific detainee handbook to include the required notification, and distributed guidance to all facility staff announcing the change. On February 10, 2023, the facility administrator reviewed and approved the updated site-specific detainee handbook, and the facility placed the updated site-specific detainee handbook in all housing

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<sup>7</sup> “Facilities shall use key covers for large security keys to prevent detainees or other unauthorized persons from observing and duplicating them.” See ICE PBNDS 2011 (Revised 2016), Standard, Key and Lock Control, Section (V)(A)(9).

<sup>8</sup> “In Facilities with ICE/ERO onsite presence, the ICE/ERO staff member receiving the request shall normally respond in person or in writing as soon as possible and practicable, but no later than within three (3) business days of receipt.” See ICE PBNDS 2011 (Revised 2016), Standard, Staff-Detainee Communication, Section (V)(B)(1)(a).

<sup>9</sup> “At a minimum, the notification shall specify: ...

8. That identity documents, such as passports, birth certificates, etc., in a detainee's possession are contraband and may be used by ICE/ERO as evidence against the detainee or for other purposes authorized by law.”

See ICE PBNDS 2011 (Revised 2016), Standard, Correspondence and Other Mail, Section (V)(C)(8).



units and uploaded it to the facility tablet system (C-1).

## CONCLUSION

During this inspection, ODO assessed the facility’s compliance with 26 standards under PBNDS 2011 (Revised 2016) and found the facility in compliance with 23 of those standards. ODO found three deficiencies in the remaining three standards and notes the facility took immediate corrective action to address one out of three deficiencies. Since the facility’s last full inspection in February 2022, the facility has maintained a “superior” rating and trended up in their overall compliance with the PBNDS 2011 (Revised 2016). The facility went from five deficient standards and five deficiencies in February 2022 to three deficient standards and three deficiencies during this inspection. The facility’s improved performance and no facility repeat deficiencies was likely a result of completing a uniform corrective action plan for ODO’s last inspection of STIPC in August 2022. The repeat deficiency cited was for the field office not responding to a detainee request in the required timeframe. ODO recommends ERO San Antonio continue to work with the facility to resolve the remaining deficiencies in accordance with contractual obligations.

<b>Compliance Inspection Results Compared</b>	<b>FY 2022 Full Inspection (PBNDS 2011) (Revised 2016)</b>	<b>FY 2023 Full Inspection (PBNDS 2011) (Revised 2016)</b>
Standards Reviewed	26	26
Deficient Standards	5	3
Overall Number of Deficiencies	5	3
Priority Component Deficiencies	N/A	0
Repeat Deficiencies	1	1
Areas Of Concern	0	0
Corrective Actions	0	1
Facility Rating	Superior	Superior