



creative  
corrections

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Making a Difference!

April 17, 2008

MEMORANDUM FOR: Gary E. Mead, Acting Director  
Office of Detention and Removal Operations

FROM:

[redacted] for [redacted]  
Reviewer-In-Charge  
Creative Corrections

SUBJECT: South Texas Detention Center  
Annual Detention Review

Creative Corrections conducted an Annual Detention Review of the South Texas Detention Complex, located in Pearsall, Texas, on April 15 - 17, 2008. The facility is operated by the Global Expertise in Outsourcing (GEO) Group, which has a contract with the United States Immigration and Customs Enforcement (ICE). As noted on the attached documents, the team of Subject Matter Experts (SME) included: [redacted] SME for Security; [redacted] SME for Health Services; [redacted] SME for Safety; [redacted] SME for Food Services; and [redacted] Reviewer in Charge.

A review closeout was conducted with [redacted] Field Office Director, ICE; [redacted] AFOD, ICE; [redacted] AFOD / OIC, ICE; [redacted] Captain USPHS, Health Service Administrator; [redacted] GEO Central Regional Vice President; [redacted] GEO Central Regional OPS Director; [redacted] GEO Warden, and included a discussion of all deficiencies and concerns noted during our review

**Type of Review:**

This review is a scheduled Detention Standard Review to determine general compliance with established ICE National Detention Standards for facilities used for over 72 hours.

**Review Summary:**

The facility has provisional accreditation by the American Correctional Association (ACA) and is accredited by the Joint Commission on Accreditation of Healthcare Organizations (JCAHO).

**Standards Compliance:**

The following information summarizes the standards reviewed and the overall compliance for this review. The following statistical information outlined provides a direct comparison of the 2007 ADR and this ADR conducted for 2008.

**March 6-7, 2007 Review**

<b>Compliant</b>	<b>38</b>
<b>Deficient</b>	<b>0</b>
<b>At-Risk</b>	<b>0</b>
<b>Not-Applicable</b>	<b>0</b>

**March 11-13,, 2008 Review**

<b>Compliant</b>	<b>37</b>
<b>Deficient</b>	<b>0</b>
<b>At-Risk</b>	<b>0</b>
<b>Not-Applicable</b>	<b>1</b>

**RIC Issues and Concerns****Food Service**

Special (therapeutic) diets must be authorized by the Clinical Director on form I-819, "Detainee Special Need(s)." The form must specify the type of diet, its duration, and any special instructions.

**Access to Medical Care**

The medical department currently has a total of 55 authorized positions with 10 vacancies. In addition there are 2 registered nurses being reassigned in the near future. Current vacancies include 3-4 mid-level practitioners and 5 registered nurses. These positions are critical to the delivery of health care and compliance with all ICE standards. Although the department is providing adequate medical care they are having difficulty meeting the 14 day standard for physical examinations.

**Keys and Lock Control**

The facility must discard any broken key from the assigned key ring and properly disposed of it.

**Recommended Rating and Justification**

It is the Reviewer-in-Charge's (RIC) recommendation that the facility receive a rating of "Good." It is also recommended by the RIC that a Plan of Action be required for this facility to identify and implement necessary corrective actions.

**RIC Assurance Statement**

All findings of this review have been documented on the Detention Review Worksheet and are supported by the written documentation contained in the review file.



**DETENTION FACILITY INSPECTION FORM  
FACILITIES USED LONGER THAN 72 HOURS**

**A. Type of Facility Reviewed**

ICE Service Processing Center  
 ICE Contract Detention Facility  
 ICE Intergovernmental Service Agreement

**B. Current Inspection**

Type of Inspection  
 Field Office  HQ Inspection  
 Date[s] of Facility Review  
 April 15-17, 2008

**C. Previous/Most Recent Facility Review**

Date[s] of Last Facility Review  
 April 10-12, 2008  
 Previous Rating  
 Superior  Good  Acceptable  Deficient  At-Risk

**D. Name and Location of Facility**

Name  
 South Texas Detention Complex  
 Address (Street and Name)  
 566 Veterans Dr.  
 City, State and Zip Code  
 Pearsall, TX 78061  
 County  
 Frio  
 Name and Title of Chief Executive Officer  
 (Warden/OIC/Superintendent)  
 b6, b7c OIC / Gary Gomez, Warden  
 Telephone # (Include Area Code)  
 830 b6, b7c  
 Field Office / Sub-Office (List Office with oversight responsibilities)  
 San Antonio, TX  
 Distance from Field Office  
 60 Miles

**E. Creative Corrections Review Team**

b6, b7c Reviewer in Charge.  
 b6, b7c SME for Security  
 b6 SME for Health Services  
 b6 SME for Safety  
 b6 SME for Food Services

**F. CDF/IGSA Information Only**

Contract Number  
 ACD-4-C-0001  
 Date of Contract or IGSA  
 January 23, 2004  
 Basic Rates per Man-Day  
 94.58  
 Other Charges: (If None, Indicate N/A)  
 N/A  
 Estimated Man-days per Year  
 560,000

**G. Accreditation Certificates**

List all State or National Accreditation[s] received:  
**Provisional American Correctional Association (ACA) and Joint Commission on Accreditation of Healthcare Organizations (JCAHO).**  
 Check box if facility has no accreditation[s]

**H. Problems / Complaints (Copies must be attached)**

The Facility is under Court Order or Class Action Finding  
 Court Order  Class Action Finding  
 The Facility has Significant Litigation Pending  
 Major Litigation  Life/Safety Issues  
 Check if None.

**I. Facility History**

Date Built  
 May, 2005  
 Date Last Remodeled or Upgraded  
 August, 2006  
 Date New Construction / Bed space Added  
 Future Construction Planned  
 Yes  No Date:  
 Current Bed Space  
 1904  
 Future Bed Space (# New Beds only)  
 Number: Date:

**J. Total Facility Population**

Total Facility Intake for previous 12 months  
 21,188  
 Total ICE Man days for Previous 12 months  
 560,000

**K. Classification Level (ICE SPCs and CDFs Only)**

	L-1	L-2	L-3
Adult Male	946	188	189
Adult Female	146	17	9
Juvenile			1

**L. Facility Capacity**

	Rated	Operational	Emergency
Adult Male	1490	1490	1490
Adult Female	388	388	388
<input type="checkbox"/> Facility holds Juveniles Offenders 16 and older as Adults			

**M. Average Daily Population**

	ICE	USMS	Other
Adult Male	1354	0	0
Adult Female	193	0	0

**N. Facility Staffing Level**

Security: b2High Support:

## SIGNIFICANT INCIDENT SUMMARY WORKSHEET

In order for Creative Corrections to complete its review of your facility, you must complete the following worksheet prior to your scheduled review dates. This worksheet must contain data for the past twelve months. We will use this worksheet in conjunction with the ICE Detention Standards to assess your detention operations with regard to the needs of ICE and its detainee population. Failure to complete this worksheet will result in a delay in processing this report, and may result in a reduction or removal of ICE detainees from your facility.

INCIDENTS	DESCRIPTION	Jan – Mar	Apr – Jun	Jul – Sep	Oct – Dec
Assaults	Types (Sexual <sup>1</sup> , Physical, etc.)	Physical	Physical	Physical	Physical
	With Weapon	0	0	0	0
	Without Weapon	21	9	28	17
Assault: Detainee on Staff	Types (Sexual Physical, etc.)	Physical	Physical	Physical	Physical
	With Weapon	0	0	0	0
	Without Weapon	2	0	7	0
Number of Forced Moves, incl. Forced Cell Moves <sup>2</sup>		1	1	3	4
Disturbances <sup>3</sup>		1	0	0	0
Number of Times Chemical Agents Used		1	0	0	0
Number of Times Special Reaction Team Deployed/Used		0	0	0	0
# Times Four/Five Point Restraints Applied/Used	Number/Reason (M=Medical, V=Violent Behavior, O=Other)	0	0	0	0
	Type (C=Chair, B=Bed, BB=Board, O=Other)	0	0	0	0
Offender / Detainee Medical Referrals as a Result of Injuries Sustained.		0	0	0	0
Escapes ∫	Attempted	0	0	1	0
	Actual	0	0	0	0
Grievances	# Received	28	22	39	229
	# Resolved in Favor of Offender/Detainee	5	6	6	8
Deaths ↓	Reason (V=Violent, I=Illness, S=Suicide, A=Attempted Suicide, O=Other)	0	0	0	0
	Number	0	0	0	0
Psychiatric / Medical Referrals	# Medical Cases Referred for Outside Care	20	21	38	38
	# Psychiatric Cases Referred for Outside Care	5	2	2	3

<sup>1</sup> Oral, anal or vaginal penetration or attempted penetration involving at least 2 parties, whether it is consenting or non-consenting

<sup>2</sup> Routine transportation of detainees/offenders is not considered "forced"

<sup>3</sup> Any incident that involves four or more detainees/offenders, includes gang fights, organized multiple hunger strikes, work stoppages, hostage situations, major fires, or other large scale incidents

## DHS/ICE DETENTION STANDARDS REVIEW SUMMARY REPORT

1. ACCEPTABLE	2. DEFICIENT	3. AT-RISK	4. REPEAT FINDING	5. NOT APPLICABLE						
<b>LEGAL ACCESS STANDARDS</b>					1.	2.	3.	4.	5.	
1.	Access to Legal Materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.	Group Presentations on Legal Rights	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3.	Visitation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.	Telephone Access	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>DETAINEE SERVICES</b>										
5.	Admission and Release	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.	Classification System	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.	Correspondence and Other Mail	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8.	Detainee Handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9.	Food Service	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10.	Funds and Personal Property	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11.	Detainee Grievance Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12.	Issuance and Exchange of Clothing, Bedding, and Towels	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13.	Marriage Requests	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14.	Non-Medical Emergency Escorted Trip	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15.	Recreation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16.	Religious Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17.	Voluntary Work Program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>HEALTH SERVICES</b>										
18.	Hunger Strikes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19.	Medical Care	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20.	Suicide Prevention and Intervention	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
21.	Terminal Illness, Advanced Directives and Death	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>SECURITY AND CONTROL</b>										
22.	Contraband	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
23.	Detention Files	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24.	Disciplinary Policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25.	Emergency Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
26.	Environmental Health and Safety	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
27.	Hold Rooms in Detention Facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
28.	Key and Lock Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
29.	Population Counts	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
30.	Post Orders	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
31.	Security Inspections	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
32.	Special Management Units (Administrative Detention)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
33.	Special Management Units (Disciplinary Segregation)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
34.	Tool Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
35.	Transportation (Land management)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
36.	Use of Force	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
37.	Staff / Detainee Communication (Added August 2003)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
38.	Detainee Transfer (Added September 2004)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**ALL FINDINGS OF DEFICIENT AND AT-RISK REQUIRE WRITTEN COMMENT DESCRIBING THE FINDING AND WHAT IS NECESSARY TO REACH COMPLIANCE.**


## RIC REVIEW ASSURANCE STATEMENT

By signing below, the Reviewer-In-Charge (RIC) certifies that:

All findings of non-compliance with policy or inadequate controls, and findings of noteworthy accomplishments, contained in this Inspection Report, are supported by evidence that is sufficient and reliable; and

Within the scope of this review, the facility is operating in accordance with applicable law and policy, and property and resources are being efficiently utilized and adequately safeguarded, except for any deficiencies noted in the report.

### REVIEWER-IN-CHARGE

Reviewer-In-Charge: (Print Name)  b6, b7c	Signature  b6, b7c
Title & Duty Location  Reviewer in Charge, Creative Corrections	Date  April 17, 2008

### TEAM MEMBERS

Print Name, Title, & Duty Location  b6, b7c SME for Security	Print Name, Title, & Duty Location  b6 SME for Health Services
Print Name, Title, & Duty Location  b6 SME for Safety	Print Name, Title, & Duty Location  b6 SME for Food Services

**RECOMMENDED RATING:**

- SUPERIOR
- GOOD
- ACCEPTABLE
- DEFICIENT
- AT-RISK

**COMMENTS:**

# MANAGEMENT REVIEW

## REVIEW AUTHORITY

THE SIGNATURE BELOW CONSTITUTES REVIEW AND ACCEPTANCE OF THIS REPORT BY THE REVIEW AUTHORITY. **FOD/OIC/CEO WILL HAVE THIRTY (30) CALENDAR DAYS FROM RECEIPT OF THIS REPORT TO RESPOND TO ALL FINDINGS AND RECOMMENDATIONS.**

HQDRO MANAGEMENT REVIEW: (Print Name) b6	Signature b6
Title Acting Chief, Detention Standards Compliance Unit	Date 5/16/08

- FINAL RATING:**
- SUPERIOR
  - GOOD
  - ACCEPTABLE
  - DEFICIENT
  - AT-RISK

**COMMENTS:** The Review Authority concurs with the recommended rating of "Good". A Plan of Action is required to address the line item deficiencies identified in the following areas:

- Food Service
- Access to Medical Care
- Key and Lock Control