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# ICE Detention Standards Compliance Review

Central Texas Detention Facility

June 30-July 3, 2008

REPORT DATE – July 14, 2008



Contract Number: ODT-6-D-0001  
Order Number: HSCEOP-07-F-01016

b6 [redacted] Executive Vice President  
Creative Corrections  
6415 Calder, Suite B  
Beaumont, TX 77706

b6 [redacted] COTR  
U.S. Immigration and Customs Enforcement  
Detention Standards Compliance Unit  
801 I Street NW  
Washington, DC 20536



6415 Calder, Suite B • Beaumont, Texas 7706  
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Making a Difference!

July 14, 2008

MEMORANDUM FOR: James T. Hayes, Jr.  
Acting Director  
Office of Detention and Removal Operations

FROM: [REDACTED] b6,b7c for [REDACTED] b6,b7c  
Reviewer-In-Charge

SUBJECT: Central Texas Detention Facility (CTDF)  
Annual Detention Review

Creative Corrections conducted an Annual Detention Review of the CTDF located in San Antonio, Texas and operated by the GEO Group, on June 30-July 3, 2008. As noted on the attached documents, my team of Subject Matter Experts included [REDACTED] b6,b7c, Safety; [REDACTED] b6, Health Services; [REDACTED] b6,b7c Security; and [REDACTED] b6 Food Services.

A review closeout was conducted with Warden [REDACTED] b6,b7c, ICE Agent [REDACTED] b6,b7c Assistant Warden [REDACTED] b6,b7c Deputy Warden [REDACTED] b6,b7c and other key management staff at the facility on July 3, 2008. The close-out included a discussion of all deficiencies and concerns noted during the review.

**Type of Review:**

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

**Review Summary:**

The CTDF is not accredited by American Correctional Association (ACA), National Commission on Correctional Health Care (NCCHC), or the Joint Commission on the Accreditation of Healthcare Organizations (JCAHO).

**Standards Compliance:**

The following statistical information outlined provides a direct comparison of the September 2007 ADR and this ADR conducted in July 2008.

**September 24-26, 2007 Review**

<b>Compliant</b>	<b>36</b>
<b>Deficient</b>	<b>0</b>
<b>At-Risk</b>	<b>0</b>
<b>Not-Applicable</b>	<b>2</b>

**June 30 – July 3, 2008 Review**

<b>Compliant</b>	<b>35</b>
<b>Deficient</b>	<b>0</b>
<b>At-Risk</b>	<b>0</b>
<b>Not-Applicable</b>	<b>3</b>

**Areas of Strength**

***Administration***

The facility has made notable Life Safety improvements rated deficient during the last review. The facility's fire plan has been approved by the City of San Antonio Fire Department and the facility complies with NFPA and OSHA requirements.

***Detainee Handbook***

The handbook, provided in both English and Spanish, is comprehensive and detailed, providing a wealth of pertinent information for each new detainee. The handbook exceeds ICE standards.

***Detention Files***

Detention files all contain a comprehensive checklist which requires or recommends documents for all intakes and a separate checklist for all releases. These checklists significantly contribute to proper file maintenance and general detainee management.

**Recommended Rating and Justification**

It is the Reviewer-in-Charge (RIC) recommendation that the facility receive a rating of "Acceptable".

**RIC Assurance Statement**

All findings of this review have been documented on the Detention Review Worksheets 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

Other Charges: (If None, Indicate N/A)  
 ; ;  N/A  
 Estimated Man-days per Year  
 240,900

### B. CURRENT INSPECTION

Type of Inspection  
 Field Office  HQ Inspection  
 Date[s] of Facility Review  
 June 30-July 3, 2008

### G. ACCREDITATION CERTIFICATES N/A

List all State or National Accreditation[s] received:  
 none

### C. PREVIOUS/MOST RECENT FACILITY REVIEW

Date[s] of Last Facility Review  
 September 26, 2007  
 Previous Rating  
 Superior  Good  Acceptable  Deficient  At-Risk

### 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  
 None

### D. NAME AND LOCATION OF FACILITY

Name  
 Central Texas Detention Facility, The GEO Group Inc.  
 Address  
 218 Laredo Street  
 City, State and Zip Code  
 San Antonio, Texas 78207  
 County  
 Bexar  
 Name and Title of Chief Executive Officer  
 (Warden/OIC/Superintendent)  
 [redacted] Warden  
 Telephone Number (Include Area Code)  
 (210) [redacted]  
 Field Office / Sub-Office (List Office with Oversight)  
 SNA Field Office  
 Distance from Field Office  
 15 miles

### I. FACILITY HISTORY

Date Built  
 1962  
 Date Last Remodeled or Upgraded  
 July, 2007  
 Date New Construction / Bed Space Added  
 July, 2007  
 Future Construction Planned  
 Yes  No Date:  
 Current Bed space | Future Bed Space (# New Beds only)  
 674 + 9 medical | Number: 0 Date:

### E. ICE INFORMATION

Name of Inspector (Last Name, Title and Duty Station)  
 [redacted] / RIC/SME Administration  
 Name of Team Member / Title / Duty Location  
 [redacted] SME Safety and Environmental Health  
 Name of Team Member / Title / Duty Location  
 [redacted] / SME Health Services  
 Name of Team Member / Title / Duty Location  
 [redacted] / SME Security and Control  
 Name of Team Member / Title / Duty Location  
 [redacted] / SME Food Services  
 Name of Team Member / Title / Duty Location  
 / /

### J. TOTAL FACILITY POPULATION

Total Facility Intake for Previous 12 months  
 7098  
 Total ICE Man Days for Previous 12 months  
 55015

### K. CLASSIFICATION LEVEL (ICE SPCs AND CDFs ONLY)

	L-1	L-2	L-3
Adult Male	74	18	11
Adult Female	18	4	0

### L. FACILITY CAPACITY

	Rated	Operational	Emergency
Adult Male	528		5
Adult Female	147		4

Facility Holds Juveniles Offenders 16 and Older as Adults

### M. AVERAGE DAILY POPULATION

	ICE	USMS	Other
Adult Male	103	460	6
Adult Female	22	69	0

### F. CDF/IGSA INFORMATION ONLY

Contract Number | Date of Contract or IGSA  
 80-99-0030 | 01/01/02  
 Basic Rates per Man-Day  
 47.27

### N. FACILITY STAFFING LEVEL

Security: | Support:  
 [redacted] b2High

## 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
Assault: Offenders on Offenders <sup>1</sup>	Types (Sexual <sup>2</sup> , Physical, etc.)	Physical	Physical	Physical	Physical
	With Weapon	0	0	0	0
	Without Weapon	8	3	5	1
Assault: Detainee on Staff	Types (Sexual Physical, etc.)	Physical	Physical	Physical	Physical
	With Weapon	0	0	0	0
	Without Weapon	3	3	5	4
Number of Forced Moves, incl. Forced Cell Moves <sup>3</sup>		0	0	0	0
Disturbances <sup>4</sup>		0	0	0	0
Number of Times Chemical Agents Used		0	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.		1	0	0	0
Escapes	Attempted	0	0	0	0
	Actual	①	0	0	0
Grievances:	# Received	54	50	72	63
	# Resolved in Favor of Offender/Detainee	2	1	4	3
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	21	18	32	33
	# Psychiatric Cases Referred for Outside Care	0	0	0	0

<sup>1</sup> Any attempted physical contact or physical contact that involves two or more offenders

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

<sup>3</sup> Routine transportation of detainees/offenders is not considered "forced"

<sup>4</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.

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## 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"/>	
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"/>	
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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>	
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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>	

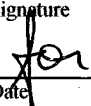
**ALL FINDINGS OF DEFICIENT AND AT-RISK REQUIRE WRITTEN COMMENT DESCRIBING THE FINDING AND WHAT IS NECESSARY TO REACH COMPLIANCE.**

## RIC REVIEW ASSURANCE STATEMENT

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

1. 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
2. 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

<b>REVIEWER-IN-CHARGE</b>	
Reviewer-In-Charge: (Print Name)  b6,b7c	Signature  b6,b7c
Title & Duty Location  Reviewer-In-Charge	Date  July 7, 2008

### TEAM MEMBERS

<b>TEAM MEMBERS</b>	
Print Name, Title, & Duty Location  b6,b7c SME Safety and Environmental Health	Print Name, Title, & Duty Location  b6 SME Health Services
Print Name, Title, & Duty Location  b6,b7c SME Security and Control	Print Name, Title, & Duty Location  b6 SME Food Services

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

**COMMENTS:** Working papers and review documents for Central Texas Detention Facility indicate compliance with the 38 National Detentions Standards, however, in light of the escape on March 31, 2008 and security weaknesses identified during the subsequent investigation and during this review, (count procedures, building inspections, entry procedures, sally port interlocks) the facility should undertake a comprehensive review of security procedures. In addition, the facility is presently holding a number of Mexican Mafia affiliates which intensifies the need for security enhancements.

The facility has made substantial improvements regarding Life Safety issues. The facility exhibits good teamwork, good leadership, and professionalism of staff.

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## HEADQUARTERS EXECUTIVE REVIEW

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<b>Review Authority</b>
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The signature below constitutes review of this report and acceptance by the Review Authority. **OIC/CEO will have 30 days from receipt of this report to respond to all findings and recommendations.**

HQDRO EXECUTIVE REVIEW: (Please Print Name) b6,b7c	Signature b6,b7c
Title Chief, Detention Standards Compliance Unit	Date March 29, 2009

- Final Rating:**
- Superior
  - Good
  - Acceptable
  - Deficient
  - At-Risk
  - No Rating

**Comments:** The Review Authority concurs with the recommended rating of "Acceptable." A Plan of Action is required to address the line item deficiencies with the Hunger Strikes; and Terminal Illness, Advanced Directives and Death standards.