

---

# ICE Detention Standards Compliance Review

**Limestone County Detention Center**

April 7-8, 2009

REPORT DATE – April 10, 2009



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

**[REDACTED]** Executive Vice President  
Creative Corrections  
6415 Calder, Suite B  
Beaumont, TX 77706

**[REDACTED]** COTR  
U.S. Immigration and Customs Enforcement  
Detention Standards Compliance Unit  
500 12th Street, SW  
Washington, DC 20536

April 10, 2009

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

FROM:

b6,b7c

Reviewer-In-Charge

b6,b7c

b6,b7c

SUBJECT: Limestone County Detention Center  
Annual Detention Review

Creative Corrections conducted an Annual Detention Review (ADR) of the Limestone County Detention Center (LCDC) located in Groesbeck, Texas, on April 7-8, 2009. The facility is owned by Limestone County and operated by Community Education Centers, Inc. As noted on the attached documents, the team of Subject Matter Experts included [b6,b7c] for Health Services; [b6,b7c] for Safety; [b6,b7c] for Security; and [b6,b7c] for Food Service.

A closeout meeting was conducted on April 8, 2009, with Warden [b6,b7c], Limestone County Judge [b6,b7c], CEC Special Assistant [b6,b7c], Immigration Enforcement Agent [b6,b7c], Immigration Enforcement Agent [b6,b7c], several key facility staff, and the review team. All aspects of the review were discussed at this meeting.

### Type of Review

This review was a scheduled ADR to determine compliance with established ICE National Detention Standards for facilities used for under-72 hours. This facility was previously reviewed in 2008 using standards for facilities used for over-72 hours.

### Review Summary

The facility is not accredited by the National Commission on Correctional Health Care, the American Correctional Association, or the Joint Commission on Accreditation of Healthcare Organizations. The facility is certified by the Texas Commission on Jail Standards.

### Standards Compliance

The following statistical information provides a comparison of the 2008 ADR and this ADR conducted for 2009.

**April 8-10, 2008 Review**

<b>Compliant</b>	<b>37</b>
<b>Deficient</b>	<b>0</b>
<b>At-Risk</b>	<b>0</b>
<b>Non-Applicable</b>	<b>1</b>

**April 7-8, 2009 Review**

<b>Compliant</b>	<b>28</b>
<b>Deficient</b>	<b>0</b>
<b>At-Risk</b>	<b>0</b>
<b>Non-Applicable</b>	<b>0</b>

**Area of Strength**

Limestone County Detention Center has an amicable, professional working relationship with all agencies using the facility (ICE, Bureau of Prisons (BOP), Limestone County, and Texas Department of Corrections). Limestone County Sheriff Dennis Wilson, Limestone County Judge [REDACTED], local ICE representatives, and the local BOP representative commended this facility on their community service, responsiveness, open communication, and professionalism.

**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 Worksheet and are supported by the written documentation contained in the review file.

**A. TYPE OF FACILITY REVIEWED**

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

Estimated Man-days per Year  
4,681

**B. CURRENT INSPECTION**

Type of Inspection  
 Field Office  HQ Inspection  
Date[s] of Facility Review  
April 7-8, 2009

**G. ACCREDITATION CERTIFICATES**  N/A  
List all State or National Accreditation[s] received:  
Texas Commission on Jail Standards

**C. PREVIOUS/MOST RECENT FACILITY REVIEW**

Date[s] of Last Facility Review  
April 8-10, 2008  
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  
Limestone County Detention Center  
Address  
910 N. Tyus Road  
City, State and Zip Code  
Groesbeck, Texas 76642  
County  
Limestone  
Name and Title of Chief Executive Officer  
(Warden/OIC/Superintendent)  
b6,b7c Warden  
Telephone Number (Include Area Code)  
(254) 729 b6,b7c  
Field Office / Sub-Office (List Office with Oversight)  
San Antonio, Texas  
Distance from Field Office  
180 miles

**I. FACILITY HISTORY**  
Date Built  
1989  
Date Last Remodeled or Upgraded  
2005-2006  
Date New Construction / Bed Space Added  
n/a  
Future Construction Planned  
 Yes  No Date:  
Current Bed space 1026 Future Bed Space (# New Beds only) Number: Date:

**E. ICE Information**

Name of Inspector (Last Name, Title and Duty Station)  
b6,b7c / Reviewer-in-Charge /  
Name of Team Member / Title / Duty Location  
b6,b7c / Security /  
Name of Team Member / Title / Duty Location  
b6,b7c / Health Services /  
Name of Team Member / Title / Duty Location  
b6,b7c / Food Service /  
Name of Team Member / Title / Duty Location  
b6,b7c Environmental Health and Safety /

**J. TOTAL FACILITY POPULATION**  
Total Facility Intake for Previous 12 months  
9,934  
Total ICE Man Days for Previous 12 months  
4,681

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

	L-1	L-2	L-3
Adult Male			
Adult Female			

**L. FACILITY CAPACITY**

	Rated	Operational	Emergency
Adult Male	1026	1026	
Adult Female	0	0	

Facility Holds Juveniles Offenders 16 and Older as Adults

**F. CDF/IGSA INFORMATION ONLY**

Contract Number 80-99-0115 Date of Contract or IGSA July 1, 2007  
Basic Rates per Man-Day \$46.81  
Other Charges: (If None, Indicate N/A)  
Transportation/Guard services; \$15.00 per hour/.585 per mile;  N/A

**M. AVERAGE DAILY POPULATION**

	ICE	USMS	Other
Adult Male	13	650	350
Adult Female	0	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
Assault: Offenders on Offenders <sup>1</sup>	Types (Sexual <sup>2</sup> , Physical, etc.)	P-2	P-5	P-7	P-13
	With Weapon	0	0	0	0
	Without Weapon	2	5	7	13
Assault: Detainee on Staff	Types (Sexual Physical, etc.)	0	0	0	0
	With Weapon	0	0	0	0
	Without Weapon	0	0	0	0
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.		0	0	0	0
Escapes	Attempted	0	0	0	0
	Actual	0	0	0	0
Grievances:	# Received	59	44	34	66
	# Resolved in Favor of Offender/Detainee	26	10	22	60
Deaths	Reason (V=Violent, I=Illness, S=Suicide, A=Attempted Suicide, O=Other)	1	0	0	1
	Number	1	0	0	1
Psychiatric / Medical Referrals	# Medical Cases Referred for Outside Care	106	107	106	107
	# Psychiatric Cases Referred for Outside Care	54	52	61	54

<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.

~~FOR OFFICIAL USE ONLY (LAW ENFORCEMENT SENSITIVE)~~

Form G-324B SIS (Rev. 7/9/07)

## 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.	Visitation				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2.	Telephone Access				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>DETAINEE SERVICES</b>										
3.	Admission and Release				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.	Classification System				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.	Detainee Handbook				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.	Food Service				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.	Funds and Personal Property				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Detainee Grievance Procedures				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9.	Issuance and Exchange of Clothing, Bedding, and Towels				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10.	Religious Practices				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>HEALTH SERVICES</b>										
11.	Medical Care				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12.	Suicide Prevention and Intervention				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>SECURITY AND CONTROL</b>										
13.	Contraband				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14.	Detention Files				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15.	Disciplinary Policy				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16.	Emergency Plans				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17.	Environmental Health and Safety				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18.	Hold Rooms in Detention Facilities				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19.	Key and Lock Control				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20.	Population Counts				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
21.	Security Inspections				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
22.	Special Management Units (Administrative Detention)				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
23.	Special Management Units (Disciplinary Segregation)				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
24.	Tool Control				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25.	Transportation (Luggage management)				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
26.	Use of Force				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
27.	Staff / Detainee Communication (Added August 2003)				<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
28.	Detainee Transfer (Added September 2004)				<input checked="" 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.**


~~FOR OFFICIAL USE ONLY (LAW ENFORCEMENT SENSITIVE)~~

## 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

Reviewer-In-Charge: (Print Name) b6,b7c	Signature  b6,b7c
Title & Duty Location	Date April 8, 2009
Reviewer-in-Charge	b6,b7c

### TEAM MEMBERS

Print Name, Title, & Duty Location b6,b7c Subject Matter Expert, Security	Print Name, Title, & Duty Location b6,b7c Subject Matter Expert, Health Services
Print Name, Title, & Duty Location b6,b7c Subject Matter Expert, Food Service	Print Name, Title, & Duty Location b6,b7c Subject Matter Expert, Environmental Health and Safety

**RECOMMENDED RATING:**

**ACCEPTABLE**  
 **DEFICIENT**  
 **AT-RISK**

**COMMENTS:** Limestone County Detention Center (LCDC) is a well managed facility with "Acceptable" compliance in all 28 National Detention Standards.

ICE periodically houses detainees at the facility. There were no detainees housed at the time of review. However, the facility is presently holding a large number of BOP inmates. LCDC recorded 4,681 ICE man days during the last 12 months.

The facility has a low number of significant incidents, as noted in the Significant Incident Summary Worksheet.

Grievances are consistent with a facility of 1,026; however, the number resolved in favor of Offender/Detainee is disproportionately high. The most grievances were complaints against staff (82), and medical or health care (66). The Grievance Coordinator explained the practice of granting offender/detainee requests to review or investigate a particular incident, but this did not indicate a finding of unprofessional conduct or wrong doing regarding staff. Likewise, grievances regarding routine or specialized medical care resulted in a follow-up appointment or review of the grievance by Health Services staff, but this did not indicate any failure regarding inmate/detainee health care. This pattern was consistent with grievances regarding other matters.

There were two inmate deaths during the last 12 months. The first death occurred on November 7, 2008, at Hillcrest Baptist Medical Center. A 22 year old BOP inmate who had been hospitalized since October 18, 2008, died of Renal Failure. The second death occurred on March 16, 2009, at the facility. A 49 year old BOP inmate was found unresponsive in his bunk at 12:44 p.m. The inmate arrived at the facility on March 13, 2009. Autopsy results are pending at this time, but preliminary review indicates death by natural causes.

~~FOR OFFICIAL USE ONLY (LAW ENFORCEMENT SENSITIVE)~~

# HEADQUARTERS EXECUTIVE REVIEW

## Review Authority

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 Assistant Director for Management	Date 10/9/2019

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

Comments: The Review Authority has downgraded the recommended rating of "Acceptable" to "Deficient" due to the use of EMDDs (Elector Muscular Disruption Devices). No Plan of Action (POA) is required in regard to the use of EMDDs. However, a POA is required to address the line item deficiencies identified in the Detainee Handbook, Food Service and Hold Rooms in Detention Facilities standards.



U.S. Department of Homeland Security  
500 12<sup>th</sup> Street, SW  
Washington, DC 20024



U.S. Immigration  
and Customs  
Enforcement

NOV 06 2009

MEMORANDUM FOR: Nuria T. Prendes  
Field Office Director  
Dallas Field Office

FROM: [REDACTED] b6,b7c  
[REDACTED] b6,b7c  
Acting Unit Chief  
Detention Standards Compliance Unit

SUBJECT: Lubbock County Detention Center Plan of Action

The Lubbock County Detention Center Plan of Action dated October 27, 2009, has been received. The plan was developed in response to a review conducted by MGT of America, Inc. on July 27-28, 2009.

The Review Authority concurs with the Plan of Action and this review is closed. The Field Office must now initiate the following actions in accordance with the Detention Management Control Program:

- 1) The Field Office Director, Detention and Removal Operations, shall notify the facility within five business days of receipt of this memorandum. Notification shall include a copy of this memorandum.
- 2) The Field Office Director shall ensure that the facility complies with its proposed Plan of Action and will conduct a follow-up review of the deficiencies identified in the G324B, *Detention Facility Review Form* and the Lead Compliance Inspector Summary Memorandum within 90 days.
- 3) The next annual review will be scheduled on or before July 27, 2010.

Should you or your staff have any questions regarding this matter, please contact [REDACTED] b6,b7c  
[REDACTED] b6,b7c Detention and Deportation Officer at (202) 732-[REDACTED] b6, b7c

cc: Official File

ICE: HQDRO: [REDACTED] b6,b7c 2-5514: 10/29/2009

[REDACTED] b2High

~~FOR OFFICIAL USE ONLY (LAW ENFORCEMENT SENSITIVE)~~

[www.ice.gov](http://www.ice.gov)