

OFFICE OF THE
**Immigration
Detention
Ombudsman**



OIDO INSPECTION
Limestone County Detention Center


OIDO-22-001
March 15, 2022



Homeland
Security

March 15, 2022

MEMORANDUM FOR: Tae D. Johnson
Acting Director
U.S. Immigration and Customs Enforcement

FROM: David D. Gersten DAVID D
Acting Ombudsman GERSTEN 
DHS Office of the Immigration Detention Ombudsman
Date: 2022.03.15 11:31:06 -04'00'

SUBJECT: OIDO-22-001
Limestone County Detention Center
October 19 and 20, 2021

The Department of Homeland Security (DHS) Office of the Immigration Detention Ombudsman (OIDO) conducted an announced inspection of the Limestone County Detention Center (LCDC) on October 19 and 20, 2021.

Attached for your information is OIDO's final report of inspection. The report contains one recommendation that LCDC be moved to a specific version of the U.S. Immigration and Customs Enforcement (ICE) detention standards for future use.

Please contact my office if you have any questions or would like to discuss these results further.



**Homeland
Security**

March 15, 2022

**OIDO INSPECTION
OF
LIMESTONE COUNTY DETENTION CENTER**
Groesbeck, Texas 76642

OIDO conducted this inspection to assess and document the conditions of detention, to include the operational efficiency and effectiveness of the Limestone County Detention Center. While the facility was not contractually subject to any version of the ICE detention standards, OIDO measured and evaluated facility conditions against requirements outlined in ICE's 2000 National Detention Standards and produced a factual findings report designed to improve operations at the facility to meet ICE standards. OIDO made one recommendation for ICE to move LCDC to a specific version of the ICE detention standards so that its detention operations can be measured, and accountability can be applied. ICE concurred with this recommendation.

INTRODUCTION

Pursuant to its statutory responsibilities, the Department of Homeland Security (DHS) Office of the Immigration Detention Ombudsman (OIDO) conducted an announced inspection of the Limestone County Detention Center (LCDC) on October 19 and 20, 2021.

Under 6 U.S.C. § 205, enacted in 2019, OIDO was established to administer an independent, neutral, and confidential process to receive, investigate, resolve, and provide redress for complaints relating to immigration detention facilities; conduct unannounced inspections; provide recommendations for immigration detention facilities and services; and review and resolve problems, including assisting individuals with complaints about the potential violation of immigration detention standards or misconduct by DHS personnel.

OIDO conducts formal fact-finding inquiries to examine conditions and circumstances related to immigration detention matters, including misconduct, violations of rights of individuals in immigration detention, and violations of law, standards of professional conduct, contract terms, and/or policies related to immigration detention.

BACKGROUND

LCDC is a county jail located in the city of Groesbeck, Texas. At the time of OIDO's inspection, the facility held 237 adult male immigration detainees. The facility can hold a maximum of 344 immigration detainees. LCDC is operated by the LaSalle Corrections Corporation, a private for-profit entity that provides contract detention services to county, state, and federal agencies. LaSalle Corrections provides food service and medical care, and Correct Commissary and Supplies provides commissary services.

LCDC is being utilized by U.S. Immigration and Customs Enforcement (ICE) pursuant to the United States Marshals Service (USMS) Intergovernmental Agreement (IGA) dated July 1, 2007 (most recently amended on August 16, 2020) as well as an Intergovernmental Service Agreement (IGSA) Task Order dated February 24, 2021. The USMS IGA requires that the facility adhere to the Department of Justice (DOJ) Federal Performance-Based Detention Standards. However, neither the most recent IGA nor IGSA Task Order require the facility to adhere to any version of the ICE detention standards.

The Nakamoto Group is contracted to conduct annual inspections at detention facilities used by ICE. The Group completed its most recent inspection of LCDC from October 11 to 14, 2021 using ICE's 2000 National Detention Standards (2000 NDS).¹ In addition, the ICE Office of Detention Oversight (ODO) is also charged with conducting periodic inspections of ICE detention facilities. ODO last inspected LCDC from March 1 to 4, 2021 using the 2019 NDS.² As noted, the current USMS IGA does not require LCDC to adhere to any specific version of the ICE detention standards.

OBJECTIVE, SCOPE, AND METHODOLOGY

On or about August 2021, ICE Enforcement and Removal Operations (ERO) Houston Field Office (ICE ERO HOU)³ requested that OIDO conduct an inspection of LCDC to assess the status of

¹ [2000 National Detention Standards for Non-Dedicated Facilities | ICE.](#)

² <https://www.ice.gov/doclib/detention-standards/2019/nds2019.pdf>.

³ In August 2021, the ICE ERO Houston Field Office (ICE ERO HOU) acquired oversight of LCDC from the ICE ERO San Antonio Field Office (ICE ERO SNA). At the time of OIDO's inspection, ICE ERO HOU did not have any

detention operations because they had recently taken over oversight responsibility of the facility. On October 19 and 20, 2021, OIDO completed an announced, in-person inspection, which consisted of a review of standard operating procedures (SOPs) and operations as well as interviews with ICE ERO personnel, facility staff, and detainees. OIDO's objective was to assess and document the conditions of detention, to include the operational efficiency and effectiveness of the facility.

Contractually, LCDC is not subject to any specific version of the ICE detention standards. For the inspection, OIDO relied on the 2000 NDS to measure facility operational performance and provide feedback for transition to an ICE detention standard. With respect to issues related to the Coronavirus (COVID-19) pandemic, OIDO used ICE's ERO COVID-19 Pandemic Response Requirements (PRR).⁴ OIDO's inspection focused on the following detention issues: staff-detainee communications, environmental health and safety, medical, and COVID-19 protocols.

OIDO completed a two-day announced, in-person inspection beginning at 8:30 a.m. on October 19, 2021 and concluding at 4:30 p.m. on October 20, 2021. The inspection was executed by eight personnel, including six investigators, one immigration detention specialist, and one medical specialist. The team collected data that was both quantitative and qualitative in nature, including interviews, observations, logbooks, video surveillance, photographs, SOPs, and contracts. OIDO investigators viewed detention files and medical records of both current and previous detainees.

OIDO measured and evaluated facility conditions against requirements outlined in the 2000 NDS concerning implementation of procedures, oversight, and documentation. OIDO believes these criteria were sufficient to gauge the overall efficiency and effectiveness of detention operations at LCDC as compared to other ICE detention facilities under 2000 NDS. However, it should be noted that findings reflected areas where facility conditions fell short of the requirements outlined in the 2000 NDS, but because LCDC was not bound by these standards, the findings were to be viewed as performance indicators and not deficiencies, per se.

FINDINGS

On November 29, 2021, OIDO sent ICE ERO a copy of its draft Factual Findings from the inspection. On December 6, 2021, OIDO conducted an Exit Conference with ICE ERO to discuss the factual findings.

OIDO staff addressed findings in the following areas:

- Staff-Detainee Communication
- Environmental Health and Safety
- Medical
- COVID-19 Protocols
- Legal Access, Asylum Interviews, and Removal Proceedings
- Recreation
- Special Management Units (SMU)
- Best Practices

permanent staff onsite at LCDC, but they were in the process of re-structuring their operations to provide full-time coverage. As of October 20, 2021, all functions related to case management were being handled by officers at ICE ERO HOU located approximately 121 miles from the facility.

⁴ <https://www.ice.gov/doclib/coronavirus/eroCOVID19responseReqsCleanFacilities.pdf>

The purpose of the factual findings report was to assist ICE in upgrading the facility to ICE's detention standards. As the USMS IGA does not require LCDC to adhere to any specific version of the ICE detention standards, OIDO's factual finding were designed to improve operations to meet the 2019 NDS standards.

RECOMMENDATION

OIDO recommends that LCDC be moved to a specific version of the ICE detention standards.

ICE RESPONSE

Concur. On March 4, 2022, ICE ERO confirmed by e-mail that it agreed with OIDO's recommendation.

OIDO ANALYSIS

OIDO considers this recommendation resolved. As of March 9, 2022, there are currently no individuals detained in LCDC for ICE. Should ICE return to using this facility, LCDC should be minimally required to adhere to the 2019 NDS so its detention operations can be measured, and accountability can be applied.

Additional Information and Copies

To view this and any of our other reports, please visit:
www.dhs.gov/office-immigration-detention-ombudsman.

For further information or questions, please contact
the Office of the Immigration Detention Ombudsman
at: detentionombudsman@hq.dhs.gov.

