

**Violations of ICE  
Detention Standards  
at South Texas ICE  
Processing Center**





**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

April 22, 2022

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

FROM: Joseph V. Cuffari, Ph.D.  
Inspector General

SUBJECT: *Violations of ICE Detention Standards at South Texas ICE Processing Center*

**JOSEPH V  
CUFFARI**

Digitally signed by  
JOSEPH V CUFFARI  
Date: 2022.04.22  
18:12:19 -04'00'

Attached for your action is our final report, *Violations of ICE Detention Standards at South Texas ICE Processing Center*. We incorporated the formal comments provided by your office.

The report contains five recommendations aimed at improving care of detainees at South Texas ICE Processing Center. Your office concurred with all five recommendations. We consider recommendations 1, 3, and 5 resolved and closed and recommendations 2 and 4 resolved and open. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions. Please send your response or closure request to [OIGISPFollowup@oig.dhs.gov](mailto:OIGISPFollowup@oig.dhs.gov).

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Thomas Kait, Deputy Inspector General for Inspections and Evaluations at (202) 981-6000.

Attachment



# DHS OIG HIGHLIGHTS

## *Violations of ICE Detention Standards at South Texas ICE Processing Center*

**April 22, 2022**

### **Why We Did This Inspection**

In accordance with the *Consolidated Appropriations Act, 2021*, we conduct unannounced inspections of U.S. Immigration and Customs Enforcement (ICE) detention facilities to ensure compliance with detention standards. Between September 2021 and October 2021, we conducted a remote inspection of the South Texas ICE Processing Center (South Texas) to evaluate compliance with ICE detention standards and COVID-19 requirements.

### **What We Recommend**

We made five recommendations to improve ICE's oversight of detention facility management and operations at South Texas.

#### **For Further Information:**

Contact our Office of Public Affairs at (202) 981-6000, or email us at [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov)

### **What We Found**

During our unannounced inspection of South Texas in Pearsall, Texas, we identified violations of ICE detention standards that compromised the health, safety, and rights of detainees. South Texas complied with standards for legal services, the voluntary work program, and detainee classification and provided sufficient medical care to detainees. However, we found that South Texas did not meet standards for grievances, segregation, COVID-19 response, or communications with detainees. Specifically, the facility was late responding to grievances and did not document grievance resolutions. Grievances included complaints about mistreatment by staff, some of which the facility substantiated. Also, South Texas did not consistently provide required services for detainees in segregation, including access to legal materials and razors; nor were we able to confirm the facility consistently provided access to legal calls, mail, commissary, and linen exchange due to missing documentation of these activities in facility records. In addressing COVID-19, South Texas did not consistently enforce precautions including use of masks and social distancing but did begin providing COVID-19 vaccinations to detainees through partnerships with local governments. Further, ICE and the facility did not consistently respond to detainee requests in a timely manner and ICE did not log requests sent by detainees using paper forms. Finally, we determined the diminished detainee population at South Texas resulted in ICE paying roughly \$18 million for unused bed space for a 1-year period under a guaranteed minimum contract.

### **ICE Response**

ICE concurred with all five recommendations. We consider three recommendations resolved and closed and two recommendations resolved and open. See Appendix B for ICE's full response.



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Department of Homeland Security

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## **Table of Contents**

Introduction.....	3
Background .....	3
Results of Inspection.....	4
South Texas Complied with Standards for Access to Legal Services and the Voluntary Work Program .....	5
South Texas Complied with the Standard for Detainee Classification .....	5
South Texas Provided Sufficient Medical Care to Detainees .....	6
South Texas Did Not Respond in a Timely Manner to Detainee Grievances and Was Missing Required Information .....	6
Detainees Alleged Mistreatment by Staff, and South Texas Substantiated Some Incidents .....	7
South Texas Did Not Provide Required Services and Privileges to Detainees in Segregation and Inappropriately Handcuffed Detainees .....	8
South Texas Took Some Measures to Prevent the Spread of COVID-19 but Did Not Consistently Enforce Some Guidelines .....	9
Detainee Communication Practices Were Deficient.....	12
Diminished Detainee Population and “Guaranteed Minimum” Contract Resulted in ICE Paying for Unused Bed Space .....	13
Recommendations.....	15
Management Comments and OIG Analysis .....	16

## **Appendixes**

Appendix A: Objective, Scope, and Methodology .....	21
Appendix B: ICE Comments to the Draft Report.....	23
Appendix C: Office of Inspections and Evaluations Major Contributors to This Report .....	29
Appendix D: Report Distribution .....	30





**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

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Abbreviations

CDC	Centers for Disease Control and Prevention
COVID-19	coronavirus disease 2019
ERO	Enforcement and Removal Operations
ICE	U.S. Immigration and Customs Enforcement
IHSC	ICE Health Service Corps
PBNDs	<i>Performance-Based National Detention Standards</i>
PRR	<i>Pandemic Response Requirements</i>
South Texas	South Texas ICE Processing Center



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Department of Homeland Security

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## **Introduction**

U.S. Immigration and Customs Enforcement (ICE) houses detainees at roughly 130 facilities nationwide, and the conditions and practices at those facilities can vary greatly. ICE is required to comply with detention standards and establish an environment that protects the health, safety, and rights of detainees. We conduct unannounced inspections of ICE detention facilities to ensure compliance with *2011 Performance-Based National Detention Standards* (2011 PBNDS). Our inspection program has identified and helped correct 2011 PBNDS violations at ICE detention facilities across the country. From September 2021 to October 2021, we conducted an unannounced remote inspection of the South Texas ICE Processing Center (South Texas) in Pearsall, Texas, and identified concerns regarding detainee care and treatment.

## **Background**

ICE apprehends, detains, and removes noncitizens who are in the United States unlawfully. ICE Enforcement and Removal Operations (ERO) oversees the detention facilities it manages in conjunction with private contractors or state or local governments. Owned and operated by GEO Group, Inc., South Texas began housing detainees in 2005 and in fiscal year 2021 had an average daily population of 821 detainees with a maximum capacity of 1,890.

ICE's contract for South Texas requires the facility to comply with the 2011 PBNDS, as revised in December 2016. According to ICE, the 2011 PBNDS establishes consistent conditions of confinement, program operations, and management expectations within ICE's detention system. These standards set requirements in areas such as:

- environmental health and safety, including cleanliness, sanitation, security, detainee searches, segregation,<sup>1</sup> and disciplinary systems;

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<sup>1</sup> ICE, *Performance-Based National Detention Standards, 2011*, Section 2.12, *Special Management Units* (Revised Dec. 2016). Segregation is the process of separating certain detainees from the general population for administrative or disciplinary reasons. Detainees in segregation at South Texas are placed in individual cells. Detainees in disciplinary segregation can be held for no more than 30 days per incident, except in extraordinary circumstances. Detainees in disciplinary segregation are allowed out of their cells for 1 hour of recreation time at least 5 days a week. Detainees in administrative segregation are separated from the general population to ensure the safety of all detainees and can be held in segregation until their safety, and the safety of others, is no longer a concern. Detainees in administrative segregation are allowed out of their cells for up to 2 hours of recreation time and day room access at least 7 days a week. Detainees in both disciplinary and administrative segregation are also allowed time out of their cells for showers, phone calls, law library, visitation, and religious services when those are offered.



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Department of Homeland Security

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- detainee care, e.g., food service, medical care, and personal hygiene;
- activities, including visitation and recreation; and
- grievance systems.

As mandated by Congress,<sup>2</sup> we conduct unannounced inspections of ICE detention facilities to ensure compliance with detention standards. From September 2021 to October 2021, we made an unannounced, remote inspection of South Texas to determine whether it complied with ICE's 2011 PBNDS. We also conducted a limited review of the facility's coronavirus disease 2019 (COVID-19) pandemic preparedness measures and its response to outbreaks of COVID-19 across the detainee population.<sup>3</sup> We incorporated information provided by the Office of Inspector General's contracted medical experts in our findings. At the start of the inspection, South Texas housed 835 ICE detainees in different housing units within the facility. During our virtual inspection, we directed one livestream video walkthrough to inspect South Texas facilities, including detainee housing units, medical units, and indoor and outdoor recreation areas. We viewed surveillance video from areas within the housing units and use of force incidents involving detainees. We also interviewed ICE personnel, South Texas officials, and detainees by telephone and video conferencing.

### **Results of Inspection**

During our unannounced inspection of South Texas in Pearsall, Texas, we identified violations of ICE detention standards that compromised the health, safety, and rights of detainees. South Texas complied with standards for legal services, the voluntary work program, and detainee classification and provided sufficient medical care to detainees. However, we found that South Texas did not meet standards for grievances, segregation, COVID-19 response, or communications with detainees. Specifically, the facility was late responding to grievances and did not document grievance resolutions. Grievances included complaints about mistreatment by staff, some of which the facility substantiated. Also, South Texas did not consistently provide required services for detainees in segregation, including access to legal materials and razors; nor were we able to confirm the facility consistently provided access to legal calls, mail, commissary, and linen exchange due to missing documentation of these activities in facility records. In addressing COVID-19, South Texas did not

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<sup>2</sup> *Consolidated Appropriations Act, 2021*, Pub. L. No. 116-260, Division F, *Department of Homeland Security Appropriations Act, 2021*; H.R. Rep. No. 116-458 (2021).

<sup>3</sup> For additional details regarding ICE's overall management of COVID-19, see: [\*ICE's Management of COVID-19 in Its Detention Facilities Provides Lessons Learned for Future Pandemic Responses\*, OIG-21-58, issued September 7, 2021.](#)



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### Department of Homeland Security

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consistently enforce precautions including use of masks and social distancing but did begin providing COVID-19 vaccinations to detainees through partnerships with local governments. Further, ICE and the facility did not consistently respond to detainee requests in a timely manner and ICE did not log requests sent by detainees using paper forms. Finally, we determined the diminished detainee population at South Texas resulted in ICE paying roughly \$18 million for unused bed space for a 1-year period under a guaranteed minimum contract.

### **South Texas Complied with Standards for Access to Legal Services and the Voluntary Work Program**

According to the 2011 PBNDS, facilities must ensure detainees have access to courts,<sup>4</sup> counsel, legal rights groups,<sup>5</sup> and legal materials as well as the opportunity to voluntarily participate in the facility's work program.<sup>6</sup> Our review of South Texas' policies, guidance, and records showed the facility complied with these standards. Specifically, legal visitation occurs in person in private rooms, as required, or through live video streaming. A legal rights group gives video presentations to detainees at the facility and holds workshops for detainees to consult with them about legal matters. Additionally, we found the detainee work program was voluntary and followed requirements. Specifically, detainee work schedules do not exceed 8 hours per day and up to 40 hours per week. Detainees receive between \$1 to \$3 dollars per day depending on their work, which meets payment guidelines. The facility's grievance log did not contain any allegations of detainees being forced to work in the detainee work program, and we found no complaints regarding the work program itself.

### **South Texas Complied with the Standard for Detainee Classification**

According to the 2011 PBNDS,<sup>7</sup> facilities must classify detainees according to risk level and house them with others of similar background and criminal history, ensuring separation of high risk and low risk detainees. Analysis of detainee housing and classification records showed that South Texas properly classified detainees according to the standard. Further, our review of housing records did not reveal commingling of low or medium-low risk detainees with medium-high or high risk detainees.

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<sup>4</sup> 2011 PBNDS, Section 6.3, *Law Libraries and Legal Material* (Revised Dec. 2016).

<sup>5</sup> 2011 PBNDS, Section 6.4, *Legal Rights Group Presentations* (Revised Dec. 2016).

<sup>6</sup> 2011 PBNDS, Section 5.8, *Voluntary Work Program* (Revised Dec. 2016).

<sup>7</sup> 2011 PBNDS, Section 2.2, *Custody Classification System* (Revised Dec. 2016).





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## **South Texas Provided Sufficient Medical Care to Detainees**

The 2011 PBNDS<sup>8</sup> requires facilities to provide medical care for detainees while in custody. Based on the review by our contracted medical experts, we found that South Texas met the 2011 PBNDS standards of medical care for those areas we evaluated. The contracted medical experts determined South Texas provided sufficient access and quality medical care to meet the general needs of the detainee population. The facility has 24-hour nursing coverage, on-call physician coverage, and an on-call mental health provider. Sick call is provided daily, and patients receive medical appointments in a timely manner. The contracted medical experts reviewed 15 detainee health records<sup>9</sup> and found the facility health services personnel provided appropriate care. In cases where South Texas could not handle a patient's medical needs, the facility made appropriate referrals to specialty care providers.

## **South Texas Did Not Respond in a Timely Manner to Detainee Grievances and Was Missing Required Information**

The 2011 PBNDS<sup>10</sup> requires staff provide a response to grievances within 5 days. However, South Texas grievance staff was not always timely when responding to detainee grievances. The standards<sup>11</sup> also require facilities to maintain a grievance log subject to regular inspection by ICE. The log must track certain details about each grievance, including the outcome of the adjudication. However, South Texas' grievance log does not list the outcome of the adjudication as required.

## **South Texas Issued Improper Extensions for Untimely Responses to Grievances**

South Texas grievance staff was not always timely when responding to detainee grievances. Specifically, the facility was late responding to 6 out of 48 grievances (12.5 percent) filed between March 13, 2021, and September 13, 2021. The 2011 PBNDS does not allow for extensions if facility staff do not respond within 5 days. However, facility grievance staff issued extensions,<sup>12</sup>

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<sup>8</sup> 2011 PBNDS, Section 4.3, *Medical Care* (Revised Dec. 2016).

<sup>9</sup> The medical contractor selected 10 health records randomly to include a review of detainee medical files for intake, sick call, and chronic care. Five additional health records were selected based on detainee interviews, medical team observations, and concerns identified during the inspection.

<sup>10</sup> 2011 PBNDS, Section 6.2, *Grievance System* (Revised Dec. 2016).

<sup>11</sup> *Id.*

<sup>12</sup> The OIG made similar determinations in [OIG-21-30, \*Violations of Detention Standards amid COVID-19 Outbreak at La Palma Correctional Center in Eloy, AZ\*](#) and [OIG-21-46, \*Violations of\*](#)



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### Department of Homeland Security

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notifying detainees of their intent to be tardy responding to the six grievances. Facility grievance staff took 8 days to respond to five of the late grievances and 7 days to respond to the remaining grievance.

### **South Texas Did Not to Comply with the Requirements for the Grievance Log**

The standards require facilities to maintain a grievance log subject to regular inspection by ICE. The grievance log must track how the facility processes each grievance, including the date of grievance filing, name of the detainee filing the grievance, nature of the grievance, date the decision is provided to the detainee, and the outcome of the adjudication. However, South Texas' grievance log does not list the outcome of the adjudication. Instead, South Texas grievance staff provides a response directly to the filing detainee without noting the outcome of the adjudication in the grievance log as required. Facilities must adhere to grievance record-keeping requirements so that ICE can gain a full understanding of detainee grievances.

### **Detainees Alleged Mistreatment by Staff, and South Texas Substantiated Some Incidents**

The 2011 PBNDS<sup>13</sup> requires detainees to be treated fairly while in custody. Detainees complained about mistreatment by staff in 13 of 48 grievances (27 percent) filed with the facility between March and September 2021. (Four of the 13 grievances arose from the same incident — four detainees filed similar complaints against the same facility staff member.) Complaints across the 13 grievances outlined concerns about staff cursing at detainees and calling them names. In one grievance, a detainee alleged a staff member told him to “go to hell” after he asked the staff member to repeat an announcement in English, but the grievance was dismissed because there were no additional witnesses present when the offensive remark was allegedly made. In another grievance, a detainee alleged that a staff member made derogatory comments to him, including calling him a “monkey,” but once again this grievance was dismissed because there were no additional witnesses who heard the exchange.

We also found grievances related to staff mistreatment that the facility substantiated through review of surveillance video. In one grievance substantiated by the facility, a staff member acted inappropriately by directing detainees who were conducting a religious worship session to go to their bunks for count 10 minutes early, which was prior to the established end time for the

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[\*Detention Standards at Adams County Correctional Center\*](#), finding both of those facilities improperly issued extensions to grievance responses.

<sup>13</sup> 2011 PBNDS, Section 6.2, *Grievance System* (Revised Dec. 2016).



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Department of Homeland Security

session. The facility found that the staff member inappropriately ended the detainees' worship session 10 minutes early; the staff member was given counseling as part of the facility's corrective actions. In another grievance, a detainee alleged an officer made unprofessional remarks, spit in his face, and physically hit him. Video surveillance reviews found the staff member approached and stood close to the detainee, with the two men directly in each other's faces during the confrontation (see Figure 1). Facility management placed the staff member on administrative leave pending an Office of Professional Responsibility investigation, but the staff member resigned during the investigation.



**Figure 1. Verbal Altercation between a Staff Member and a Detainee**

*Source:* Video surveillance footage provided by South Texas staff

## **South Texas Did Not Provide Required Services and Privileges to Detainees in Segregation and Inappropriately Handcuffed Detainees**

The PBNDS 2011<sup>14</sup> defines the use of administrative and disciplinary segregation at detention centers. Administratively segregated detainees should receive access to the same privileges as those in the general population. We conducted a review of 15 segregation files, including 14 detainees in administrative segregation and 1 in disciplinary segregation. We found segregated detainees were not consistently provided required services and privileges. Additionally, we found that detainees held in disciplinary segregation were inappropriately handcuffed anytime they left their cell.

<sup>14</sup> 2011 PBNDS, Section 2.12, *Special Management Unit* (Revised Dec. 2016).



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Department of Homeland Security

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According to the PBNDS 2011,<sup>15</sup> placement in disciplinary segregation alone does not constitute a valid basis for using restraints.

**South Texas Did Not Provide Required Services and Privileges to Detainees in Segregation**

The 2011 PBNDS requires all detainees in segregation receive access to recreation, legal calls, laundry services for bedding and clothing, mail, legal materials, and the law library.<sup>16</sup> Administratively segregated detainees should also have access to the commissary. We found the facility was not consistently providing access to recreation and laundry service. For example:

- 6 detainees (40 percent) in segregation were not always provided with required recreation time outside their cell; and
- 12 detainees (80 percent) in segregation were not always provided with laundry service, and no information about laundry service was recorded for the other 3 detainees in segregation.

Additionally, we were unable to confirm that the facility consistently provided access to laundry services, mail, legal materials, and the commissary due to the absence of documentation in facility records. Facilities must demonstrate they are following standards and providing proper care to detainees in segregation by recording all required activity in segregation logs.

**South Texas Violated Detention Standards with the Use of Restraints for Detainees in Disciplinary Segregation**

South Texas policy<sup>17</sup> requires detainees in disciplinary segregation to be restrained during movements outside of their cells. However, ICE's standards<sup>18</sup> stipulate that placement in disciplinary segregation alone is not a valid basis for using restraints. The South Texas practice of using restraints violates ICE detention standards and infringes on detainee rights.

**South Texas Took Some Measures to Prevent the Spread of COVID-19 but Did Not Consistently Enforce Some Guidelines**

We conducted a limited review of South Texas' response to COVID-19 and identified areas for improvement. Although South Texas took some measures

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<sup>15</sup> 2011 PBNDS, Section 2.12.V.E, *Special Management Units* (Revised Dec. 2016).

<sup>16</sup> 2011 PBNDS, Section 2.12, *Special Management Unit* (Revised Dec. 2016).

<sup>17</sup> GEO Group, *South Texas ICE Processing Center, Policy and Procedure Manual*, Part 2: Security, Restricted Housing Unit – Administrative and Disciplinary.

<sup>18</sup> 2011 PBNDS, Section 2.12.V.E, *Special Management Units* (Revised Dec. 2016).





## OFFICE OF INSPECTOR GENERAL

### Department of Homeland Security

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to prevent the spread of COVID-19, such as restricting some services for several months and providing masks to detainees, facility officials did not enforce mask wearing or social distancing in detainee housing units. During our September 2021 livestream walkthrough across multiple housing units, we observed numerous detainees not wearing masks when within 6 feet of each other. We also reviewed facility surveillance video footage from September 2021 and observed detainees gathered in groups in the housing units and not wearing masks or practicing social distancing.

From February 2020 to November 2021, South Texas had 1,128 detainees<sup>19</sup> with confirmed cases of COVID-19, and 2,553 detainees<sup>20</sup> had been vaccinated.

### **South Texas Restricted Services and Social Activities in Response to COVID-19**

In March 2020, ICE directed all detention facilities, including South Texas, to restrict certain activities in response to the COVID-19 pandemic.<sup>21</sup> This included halting in-person social visitation though visits from legal representatives and legal rights groups were still allowed. To compensate for the lost visitation, South Texas provided each detainee with 13 free 10-minute telephone calls per week and one 15-minute video chat per week. The facility also paused visits by outside religious groups, relying on the facility chaplain to provide in-person religious services. South Texas also suspended barber shop services until January 2021 and restricted detainee access to the facility's large recreation yard to one housing unit at a time until July 2021, when it increased access to the yard to two dormitories at once.

### **South Texas Did Not Consistently Ensure Detainees Wore Masks or Practiced Social Distancing**

ICE's *Pandemic Response Requirements* (PRR) Version 6, dated March 16, 2021, states all staff and detainees should wear masks, and whenever possible, all staff and detainees should maintain a distance of 6 feet from one another to help slow the spread of COVID-19. During our September 2021 livestream walkthrough across multiple housing units, we observed numerous detainees within 6 feet of each other and not wearing masks. We also reviewed facility surveillance video footage from September 2021 and observed detainees gathered in groups in the housing units and not wearing masks or practicing social distancing, as shown in Figure 2.

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<sup>19</sup> ICE number of reported COVID-19 cases as of November 4, 2021.

<sup>20</sup> South Texas' reported figure of detainees fully vaccinated from COVID-19 as of October 31, 2021.

<sup>21</sup> ICE, Memorandum on Coronavirus Disease 2019 (COVID-19) Action Plan, Revision 1, March 27, 2020.



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Department of Homeland Security

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**Figure 2. South Texas Detainees Not Wearing Masks and Not Practicing Social Distancing on September 15, 2021**

*Source:* Video surveillance footage provided by South Texas staff

Staff told us detainees were required to wear masks outside their housing units, though within housing units they only encouraged detainees to wear masks and posted signs explaining the importance of wearing masks. Staff admitted the facility had trouble enforcing mask usage inside the housing units and did not impose discipline on detainees who did not comply. Nevertheless, the PRR guidance makes no distinction in location (inside or outside housing units) in its mask-wearing requirement. The facility risks additional COVID-19 spread by not ensuring detainees wear their masks and practice social distancing within the housing units.

### **South Texas Began Vaccinating Detainees**

In April 2021, South Texas began providing COVID-19 vaccinations to detainees. According to data provided by facility officials, South Texas had vaccinated 2,553 detainees as of October 31, 2021.



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Department of Homeland Security

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## **Detainee Communication Practices Were Deficient**

The 2011 PBNDS<sup>22</sup> establishes procedures for contact between staff and detainees, including written communication and observation of living conditions. Although required, we found that South Texas facility staff and ICE did not provide timely responses to detainee requests. Further, ICE did not properly log detainee requests submitted via paper forms in its detainee requests log, as the standards require.

### **South Texas and ICE Did Not Provide Timely Responses to Detainee Requests**

The 2011 PBNDS establishes procedures for detainees to submit written requests to ICE and facility staff and requires them to respond within 3 business days of receipt.<sup>23</sup> We determined both the facility and ICE struggled to provide timely responses to detainee requests. According to facility request logs, South Texas detainees submitted 1,393 requests from March 13, 2021, to September 13, 2021. Facility staff did not respond within 3 business days for 183 of these requests, or approximately 13 percent of the time, for this 6-month period. The facility's response time exceeded 10 business days for 59 requests, or approximately 4 percent of the time, with 49 days as the longest response time.

During the same 6-month period, South Texas detainees submitted 5,804 requests to ICE. OIG analysis revealed that ICE exceeded the 3-day response timeframe for 3,316 of these requests, or approximately 57 percent of the time. ICE's response time exceeded 10 business days for 1,216 requests, or approximately 21 percent of the time, with 53 days as the longest response time. Further, some of the ICE requests appear to have been unanswered for weeks, as they were only closed by ICE after we requested copies of the ICE requests log during fieldwork for this inspection.

ICE and facility staff both contended they were understaffed, which caused them to be late responding to requests. The facility also admitted that staff neglected to check the detainee request boxes daily, making it more difficult for the facility to meet the 3-day response deadline.

### **ICE Did Not Log Detainee Requests Received via Paper Forms**

ICE does not log requests filed by detainees via paper forms as required. Detainees at South Texas can send requests either electronically, using tablets

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<sup>22</sup> 2011 PBNDS, Section 2.13, *Staff-Detainee Communication* (Revised Dec. 2016).

<sup>23</sup> *Id.*



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### Department of Homeland Security

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available in their housing units, or on paper forms that they deposit in secure ICE drop boxes located in their housing units. An ICE official estimated the majority of all detainee requests to ICE are filed electronically, with only 2 to 3 requests per week filed on paper. Requests filed using the tablets are automatically logged in an electronic system that tracks their completion, but paper requests are not entered into this system and are not otherwise tracked. Instead, the deportation officer responsible for paper requests simply addresses the request and puts the paper form in the detainee's A-file without ever logging it. This leaves a category of detainee requests absent from the ICE requests log, in a clear lapse in compliance with the standard.

### **Diminished Detainee Population and “Guaranteed Minimum” Contract Resulted in ICE Paying for Unused Bed Space**

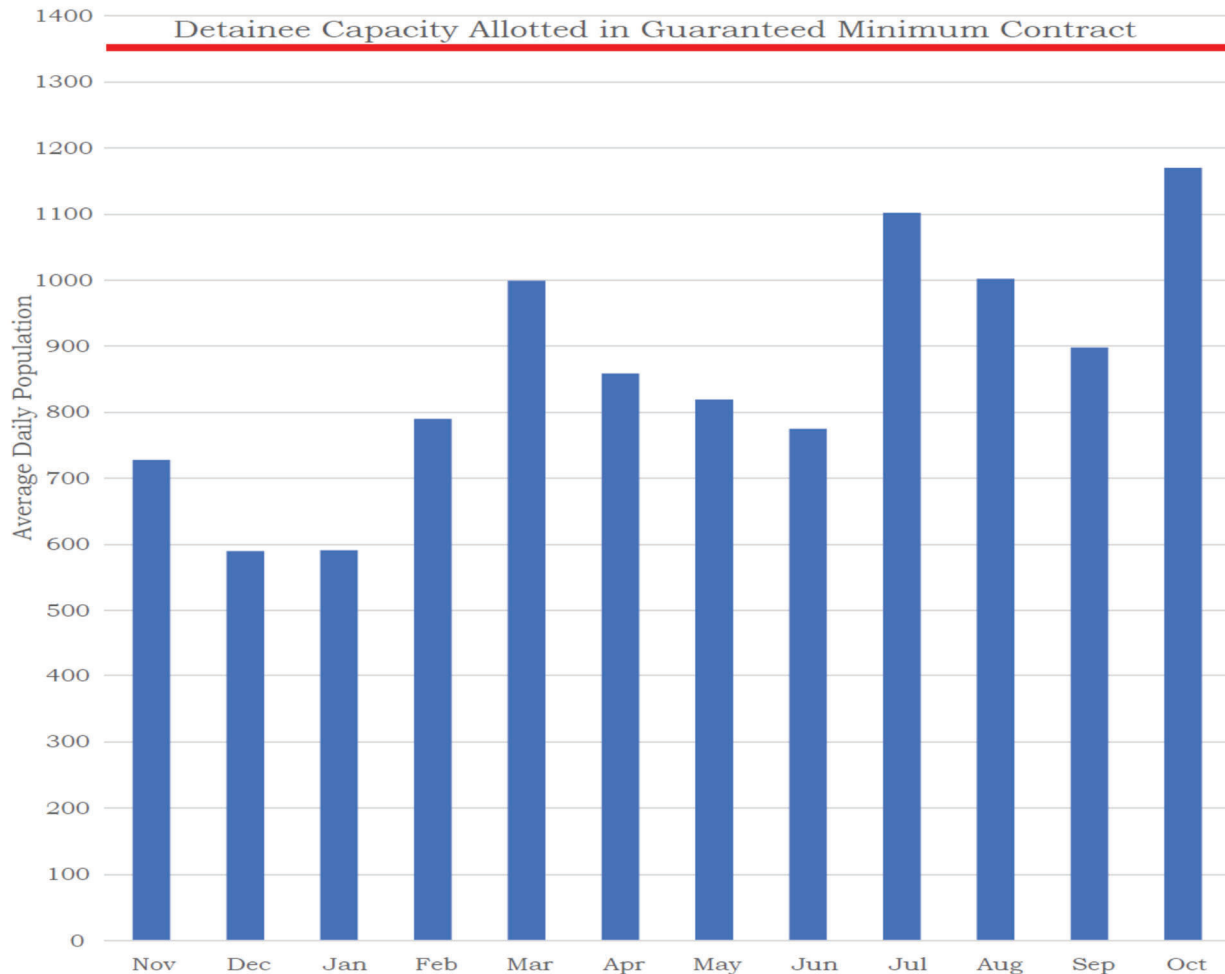
ICE's contract with GEO Group, Inc. required ICE to pay the facility for space for a guaranteed minimum of 1,350 detainees at a daily rate of \$100.86 per detainee until August 2021, when that daily rate increased to \$101.36. During this time, the PRR also stated that facilities should make efforts to reduce their populations to approximately 75 percent of capacity; at a maximum capacity of 1,890, South Texas could house up to 1,417 detainees and still meet the capacity restrictions in place because of COVID-19. Nonetheless, South Texas' average daily detainee population was at nearly half its guaranteed minimum from November 2020 until March 2021, before rising to a peak of almost 87 percent of its guaranteed minimum capacity in October 2021, as shown in Figure 3. From November 2020 to October 2021, on average, 36 percent of the guaranteed bed space at South Texas went unused, with the detainee population never surpassing the guaranteed minimum of 1,350. We determined ICE paid approximately \$18 million for unused bed space for a 1-year period under the guaranteed minimum contract.





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**Figure 3. Detainee Population at South Texas,  
November 2020 to October 2021**



Source: DHS OIG analysis of data provided by South Texas

Although ICE was not using all its contracted beds, South Texas was not using all available housing units to allow for appropriate social distancing to prevent the spread of COVID-19. Specifically, South Texas filled housing units of detainees with no suspected COVID-19 exposure to full capacity rather than spacing detainees out in the housing units to mitigate exposure. In October 2021, even when the facility was at 87 percent of its guaranteed minimum capacity, the facility still left two dormitories unused rather than spacing out the detainees.

As detainee populations continue to be well below the guaranteed minimum of 1,350 per day, the monthly and daily costs for ICE to house each detainee increases as demonstrated in Table 1, which details the average costs ICE paid to house each detainee.



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**Table 1. Average Cost to ICE Per Detainee at South Texas,  
November 2020 to October 2021**

<b>Month</b>	<b>Average Daily Population</b>	<b>Monthly Cost per Detainee</b>	<b>Average Daily Cost per Detainee</b>
November 2020	728	\$5,623.33	\$187.44
December 2020	590	\$7,164.82	\$231.12
January 2021	591	\$7,155.80	\$230.83
February 2021	790	\$4,944.42	\$176.59
March 2021	999	\$4,233.23	\$136.56
April 2021	859	\$4,916.87	\$163.90
May 2021	819	\$5,179.45	\$167.08
June 2021	775	\$5,498.82	\$183.29
July 2021	1,102	\$3,838.37	\$123.82
August 2021	1,002	\$4,240.80	\$136.80
September 2021	898	\$4,666.43	\$155.55
October 2021	1,170	\$3,631.27	\$117.14

*Source:* DHS OIG analysis of data provided by South Texas

Although ICE must acquire and maintain enough bed space to satisfy demand for detainee population surges, it must also strive to avoid wasting funds on empty beds. Based on the guaranteed minimum, South Texas will continue to receive full payment from ICE even when housing fewer detainees.

### **Recommendations**

We recommend the Executive Associate Director of Enforcement and Removal Operations direct the San Antonio Enforcement and Removal Field Office responsible for South Texas to:

**Recommendation 1:** Ensure South Texas meets ICE's COVID-19 requirements for wearing masks and social distancing.

**Recommendation 2:** Establish a grievance tracking system to ensure timely responses to all detainee grievances filed at South Texas, with a complete grievance log.



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**Recommendation 3:** Establish a requests tracking system to ensure timely responses to all detainee requests filed at South Texas, with a complete request log.

**Recommendation 4:** Ensure compliance with segregation standards, including the use of restraints, access to recreation, legal calls, laundry services for bedding and clothing, mail, legal materials, and the law library.

**Recommendation 5:** Determine ICE housing requirements based on COVID-19 protocols and guaranteed minimums outlined in the contract.

### **Management Comments and OIG Analysis**

ICE concurred with all five recommendations. Appendix B contains ICE management comments in their entirety. We also received technical comments on the draft report and made revisions as appropriate. We consider three recommendations resolved and closed and two recommendations resolved and open.

A summary of ICE's response to our recommendation and our analysis follows.

**Recommendation 1:** Ensure South Texas meets ICE's COVID-19 requirements for wearing masks and social distancing.

**ICE Response to Recommendation 1:** Concur. South Texas operates under the guidelines of the PRR, which is in alignment with the Centers for Disease Control and Prevention's (CDC) *Interim Guidance on Management of COVID-19 in Correctional and Detention Facilities*. Accordingly, in April 2020, South Texas implemented CDC-approved signage highlighting the importance of social distancing, wearing a mask, proper handwashing, and personal hygiene throughout the facility to help reduce the risk and spread of COVID-19. During intake at the facility, South Texas also provides detainees with masks as part of the arrival process, and on every other day or as needed while they are housed at the facility. In addition, South Texas staff make daily COVID-19 informational announcements throughout the facility reminding detainees of the various COVID-19 requirements, including those related to social distancing and mask wearing. For instance, COVID-19 announcements are made during every count time (5 times daily), and a daily informational video is broadcasted in all dormitories.

To mitigate the spread of COVID-19, all incoming detainees are placed in a dormitory as a cohort for a 10-day quarantine period and are closely monitored by ICE Health Service Corps (IHSC) medical staff. Detainees who test positive for COVID-19 are placed in a restricted dormitory and isolated from the general



## OFFICE OF INSPECTOR GENERAL

### Department of Homeland Security

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population. On April 2021, IHSC also began to offer COVID-19 vaccines to all detainees within South Texas, and as of March 2022, IHSC has vaccinated 2,559 detainees with at least one dosage. However, 480 detainees refused to be vaccinated against COVID-19. To support this effort, IHSC personnel visit housing units daily to provide COVID-19 vaccines to detainees who wish to be vaccinated. Detainees who refuse to be vaccinated are provided with information on the risks associated with COVID-19. ICE will continue to follow the CDC's guidance and will adapt its protocols, as appropriate.

ICE requests OIG consider this recommendation resolved and closed, as implemented.

**OIG Analysis:** We consider these actions responsive to the recommendation, which is resolved and closed. ICE showed that the facility is making daily announcements to remind detainees and staff to wear masks and socially distance. The facility also showed that all detainees at the facility have been offered vaccines, and those who want a vaccine have been vaccinated.

**Recommendation 2:** Establish a grievance tracking system to ensure timely response to all detainee grievances filed at South Texas, with a complete grievance log.

**ICE Response to Recommendation 2:** Concur. On October 22, 2021, South Texas updated its procedures to no longer grant extensions when responding to grievances so that South Texas staff provide a response within 5 calendar days, in accordance with the 2011 PBNDS. Additionally, the grievance tracking log will be modified to clearly capture the grievance disposition and outcome to properly document the resolution. Upon request, ICE ERO will provide OIG copies of the weekly grievance logs to demonstrate compliance with the 2011 PBNDS. Estimated Completion Date (ECD): June 30, 2022.

**OIG Analysis:** We consider these actions responsive to the recommendation, which is resolved and open. ICE showed that South Texas changed its policy to respond to grievances within the required timeline and no longer grant extensions. The facility has also developed a log to track grievances, including the disposition and outcome. OIG will close this recommendation once ICE provides copies of weekly grievance logs to demonstrate compliance with the 2011 PBNDS.

**Recommendation 3:** Establish a request tracking system to ensure timely responses to all detainee requests filed at South Texas, with a complete request log.





**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

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**ICE Response to Recommendation 3:** Concur. On October 19, 2021, ICE implemented a policy at South Texas with regard to staff-detainee communication to ensure staff provides timely responses to detainee requests. ICE conducted training, initial and refresher, for all South Texas staff on February 28, 2022, and March 22, 2022, respectively. Currently, staff-detainee communication requests submitted by detainees and placed in the ICE drop boxes are picked up daily by ICE staff. ICE will ensure staff-detainee communication requests are answered in a timely manner and logged into a database, and that noncitizens are provided with a hard copy for compliance with the 2011 PBNDS.

ICE requests OIG consider this recommendation resolved and closed, as implemented.

**OIG Analysis:** We consider these actions responsive to the recommendation, which is resolved and closed. ICE showed that it implemented a staff-detainee communication policy at South Texas to ensure staff provides timely responses to detainee requests. ICE also conducted training for all South Texas staff on the policy. ICE showed that it is ensuring requests are answered in a timely manner and logged into a database, and that noncitizens are provided with a hard copy for compliance with the 2011 PBNDS.

**Recommendation 4:** Ensure compliance with segregation standards, including the use of restraints, access to recreation, legal calls, laundry services for bedding and clothing, mail, legal materials, and the law library.

**ICE Response to Recommendation 4:** Concur. South Texas provides recreation, legal calls, laundry services, mail, legal materials, and access to the law library to detainees placed in segregation. On December 29, 2021, ICE corrected the practice of documenting access provided to mail services. Currently, detainees in segregation have access to the commissary, and may place orders on a Monday and receive their orders within the week. Commissary orders are not documented on a detainee's bed card, but the commissary maintains records of all purchases for record keeping. Moving forward, all requests for commissary services will be documented in the segregation unit's activity logbook, as well as whether the detainee accepted or declined a service.

OIG's finding of use of restraints for detainees in segregation has also been addressed and corrected by ICE. The policy was updated and implemented on October 7, 2021, and training was conducted starting on October 30, 2021. Specifically, ICE updated South Texas' post orders to indicate that placement in a segregation does not constitute a valid basis for the use of restraint while



**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

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in segregation or during movement around the facility. Restraints should only be used, if necessary, as a precaution against escape during transfer, for medical reasons when directed by the medical office, or to prevent self-injury, injury to others, or serious property damage. Allowing for time to record placements, ICE will provide OIG documentation corroborating these actions under a separate cover. ECD: June 30, 2022.

**OIG Analysis:** We consider these actions responsive to the recommendation, which is resolved and open. ICE made corrections to ensure South Texas' compliance with standards, including documentation of access to mail and commissary services and updated policy for use of restraints. ICE also indicated it provided staff training on segregation. OIG will close this recommendation once ICE provides evidence showing the changes made to the segregation records for detainees showing they have access to all required services.

**Recommendation 5:** Determine ICE housing requirements based on COVID-19 protocols and guaranteed minimums outlined in the contract.

**ICE Response to Recommendation 5:** Concur. Not only does ICE ERO operate under the guidelines of the PRR and CDC guidance, as previously noted, but also the *Fraihat v. ICE* injunction,<sup>24</sup> entered on April 20, 2020, to ensure the safety of the detainees and maintain appropriate detention levels during the COVID-19 pandemic. In accordance with the PRR, ICE IHSC evaluates all incoming detainees and tests them for COVID-19 upon arrival at South Texas. Following intake, detainees are separated into different housing units based on their COVID-19 test results and placed into one of three categories:

- COVID-19 positive;
- COVID-19 exposed; or
- COVID-19 negative and considered not to be exposed.

Once a cohort is established and placed in quarantine, ERO does not allow, or place, any other detainees in the same housing unit. ERO will then evaluate its immigration cases and may release certain detainees due to removal, bonds, or *Fraihat v. ICE* injunction guidelines, as appropriate. Once a housing unit completes its quarantine requirement, and IHSC has medically cleared the detainees, ERO will combine housing units to the maximum extent possible to bring the capacity to the guaranteed minimum, as defined in the contract and pursuant to PRR guidelines. Furthermore, once housing units are combined, empty housing units are thoroughly cleaned and sanitized before being used to

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<sup>24</sup> *Fraihat v. Immigr. and Customs Enf.*, No. 19-1546, 2020 WL 6541994 (C.D. Cal. Oct. 7, 2020).



## OFFICE OF INSPECTOR GENERAL

### Department of Homeland Security

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house new incoming noncitizens. ICE ERO will also combine housing units to provide availability for the constant space requests from our partners on the Southwest border, as appropriate.

In addition, ICE will continue to test detainees for COVID-19, offer vaccines to detainees not previously vaccinated, and provide masks to all detainees housed at South Texas, in accordance with ICE requirements and guidelines.

Information regarding COVID-19 precautions will also continue to be provided to detainees upon arrival at South Texas, as well as broadcasted over the loudspeaker and televisions in all housing units, as previously noted, and South Texas will continue to provide reminders of the necessity to wear masks and maintain social distance. Safety protocols have proven effective in limiting exposure to COVID-19 among detainees and ICE will adapt its protocols to continue to ensure the safety of South Texas staff and detainees, while meeting the guaranteed minimums outlined in the contract.

**OIG Analysis:** We consider these actions responsive to the recommendation, which is resolved and closed. ICE showed that the facility is making determinations on appropriate detention levels during the COVID-19 pandemic to accommodate quarantine procedures and requirements established as part of litigation. ICE also reported that the established safety protocols have proven effective in limiting exposure to COVID-19 among detainees and ICE will adapt its protocols to continue to ensure the safety of South Texas staff and detainees, while meeting the guaranteed minimums outlined in the contract.



## **Appendix A**

### **Objective, Scope, and Methodology**

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*.

DHS OIG initiated this inspection at Congress' direction. Prior to conducting an unannounced inspection, we review and analyze concerns raised by immigrant rights groups and complaints to the DHS OIG Hotline about conditions for detainees in ICE custody. We generally limited our scope to the 2011 PBNDS for health, safety, medical care, mental health care, grievances, classification, and searches, use of segregation, use of force, language access, and staff training. We also conducted a limited review of facility compliance with COVID-19 requirements.

We conducted the inspection remotely, given the inherent risks associated with onsite inspections during the COVID-19 pandemic. We focused on elements of these standards that could be observed and evaluated remotely.

Prior to our inspection, we reviewed relevant background information, including:

- OIG Hotline complaints
- ICE 2011 PBNDS
- ICE Office of Detention Oversight reports
- Information from nongovernmental organizations

We conducted our unannounced remote inspection of South Texas from September 13, 2021, to October 29, 2021. During the inspection we:

- Directed the locations within the facility we would observe during a live video walkthrough. We viewed areas used by detainees including intake processing areas; medical facilities; residential areas, including sleeping, showering, and toilet facilities; legal services areas, including law libraries; and recreational facilities.
- Reviewed select video surveillance footage of detainee housing units from September 2021 and use of force incidents from March 2021 to September 2021.
- Reviewed the facility's compliance with key health, safety, and welfare requirements of the 2011 PBNDS for classification, segregation, access to





## OFFICE OF INSPECTOR GENERAL

### Department of Homeland Security

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medical care and mental health care, and medical and nonmedical grievances.

- Reviewed the facility's response to the COVID-19 pandemic, including standards modified and whether ICE was notified about and approved any changes that affected facility compliance with applicable standards.
- Interviewed ICE and detention facility staff members, including key ICE operational and detention facility oversight staff and detention facility medical, segregation, classification, grievance, and compliance officers.
- Interviewed detainees to evaluate the facility's compliance with 2011 PBNDS grievance procedures and grievance resolution.
- Reviewed documentary evidence, including medical files, and grievance and communication logs and files.

We contracted with a team of qualified medical professionals to conduct a comprehensive evaluation of detainee medical care at the South Texas facility. We incorporated information provided by the medical contractors into our findings.

We conducted this review under the authority of the *Inspector General Act of 1978*, as amended, and according to the *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency.



**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

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**Appendix B**  
**ICE Comments to the Draft Report**

U.S. Department of Homeland Security  
500 12th Street, SW  
Washington, D.C. 20536



**U.S. Immigration  
and Customs  
Enforcement**

April 5, 2022

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.  
Inspector General

FROM: Jason Houser  
Chief of Staff (Acting) *Jason P Houser*

SUBJECT: Management Response to Draft Report: "Violations of  
Detention Standards at South Texas ICE Processing Center"  
(Project No. 21-004-SRE-ICE)

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department), U.S. Immigration and Customs Enforcement (ICE) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

ICE is pleased to note that the OIG found the South Texas ICE Processing Center (STIPC) in compliance with detention standards for legal services, voluntary work program, and detainee classification, as well as that the STIPC provided sufficient medical care to detainees. This aligns with ICE's commitment to the safety and wellbeing of noncitizens in its custody.

Accordingly, noncitizens at the STIPC are continuously provided with information on the importance of maintaining safe distancing, wearing a mask, proper handwashing, and personal hygiene as relates to the prevention of COVID-19. Furthermore, via the "ICE Enforcement and Removal Operations (ERO) Pandemic Response Requirements (PRR)," dated April 4, 2022, ICE implemented, executed, and ensures healthcare protocols and testing procedures for COVID-19 in alignment with the Center for Disease Control and Prevention (CDC) "Interim Guidance on Management of COVID-19 in Correctional and Detention Facilities."

However, it is important to note that ICE must acquire and maintain enough bed space to satisfy the largely unpredictable demand for detainee population surges, while also maintaining the safety of noncitizens. As part of balancing these requirements, ICE ERO will continue to assess the housing needs at the STIPC, adhering to contracted guaranteed

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## **OFFICE OF INSPECTOR GENERAL**

### **Department of Homeland Security**

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Management Response to Draft Report: "Violations of Detention Standards at South Texas ICE Processing Center" (Project No. 21-004-SRE-ICE)

Page 2

minimum capacity, but also considering reductions, as appropriate, while maintaining the safety of, and mitigating potential risk to the wellbeing of detainees, staff, contractors, visitors, and stakeholders at the STIPC. ICE remains committed to ensuring that noncitizens in its custody reside in safe, secure, and humane environments and under appropriate conditions of confinement.

The draft report contained five recommendations, with which ICE concurs. Attached please find our detailed response to the recommendations. ICE previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for OIG's consideration, as appropriate.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Attachment



**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

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Management Response to Draft Report: “Violations of Detention Standards at South Texas ICE Processing Center” (Project No. 21-004-SRE-ICE)

Page 3

**Attachment: Management Response to Recommendations  
Contained in 21-004-SRE-ICE**

OIG recommended that the ICE Executive Associate Director of ERO direct the San Antonio Field Office responsible for the STIPC:

**Recommendation 1:** Ensure South Texas meets ICE’s COVID -19 requirements for wearing masks and social distancing.

**Response:** Concur. The STIPC operates under the guidelines of the PRR, which is in alignment with the CDC Interim Guidance on Management of COVID-19 in Correctional and Detention Facilities. Accordingly, in April 2020, the STIPC implemented CDC-approved signage highlighting the importance of social distancing, wearing a mask, proper handwashing, and personal hygiene throughout the facility to help reduce the risk and spread of COVID-19. During intake at the facility, the STIPC also provides detainees with masks as part of the arrival process, and on every other day or as needed while they are housed at the facility. In addition, STIPC staff make daily COVID-19 informational announcements throughout the facility reminding detainees of the various COVID-19 requirements, including those related to social distancing and mask wearing. For instance, COVID-19 announcements are made during every count time (5 times daily), and a daily informational video is broadcasted in all dormitories.

To mitigate the spread of COVID-19, all incoming detainees are placed in a dormitory as a cohort for a 10-day quarantine period and are closely monitored by the ICE Health Service Corps (IHSC) medical staff. Detainees that test positive for COVID-19 are placed in a restricted dormitory and isolated from the general population. On April 2021, IHSC also began to offer COVID-19 vaccines to all detainees within the STIPC, and as of March 2022, IHSC has vaccinated 2,559 detainees with at least one dosage, however 480 detainees refused to be vaccinated against COVID-19. To support this effort, IHSC personnel visit housing units daily to provide COVID-19 vaccines to detainees who wish to be vaccinated. Detainees that refuse to be vaccinated are provided with information on the risks associated with COVID-19. ICE will continue to follow the CDC’s guidance, and will adapt its protocols, as appropriate.

ICE provided the OIG documentation corroborating these efforts under a separate cover on April 4, 2022. ICE requests the OIG consider this recommendation resolved and closed, as implemented.





**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

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Management Response to Draft Report: “Violations of Detention Standards at South Texas ICE Processing Center” (Project No. 21-004-SRE-ICE)

Page 4

**Recommendation 2:** Establish a grievance tracking system to ensure timely response to all detainee grievances filed at South Texas, with a complete grievance log.

**Response:** Concur. On October 22, 2021, the STIPC updated its procedures to no longer grant extensions when responding to grievances so that STIPC staff provide a response within five calendar days, in accordance with the ICE 2011 Performance-Based National Detention Standards (2011 PBNDS). Additionally, the grievance tracking log will be modified to clearly capture the grievance disposition and outcome to properly document the resolution. Upon request, ICE ERO will provide the OIG copies of the weekly grievance logs to demonstrate compliance with the 2011 PBNDS. Estimated Completion Date (ECD): June 30, 2022.

**Recommendation 3:** Establish a request tracking system to ensure timely responses to all detainee requests filed at South Texas, with a complete request log.

**Response:** Concur. On October 19, 2021, ICE ERO implemented a policy at the STIPC with regard to staff-detainee communication (SDC) to ensure staff provides timely responses to detainee requests. ERO also conducted Talton training, initial and refresher, for all STIPC staff on February 28, 2022 and March 22, 2022, respectively. Currently, SDC requests submitted by detainees and placed in the ICE drop boxes are picked up daily by ICE ERO staff. ERO will ensure SDC requests are answered timely and logged into a database, and that noncitizens are provided with a hard copy for compliance with the ICE 2011 PBNDS.

ICE provided the OIG documentation corroborating these efforts under a separate cover on April 4, 2022. ICE requests the OIG consider this recommendation resolved and closed, as implemented.

**Recommendation 4:** Ensure compliance with segregation standards, including the use of restraints, access to recreation, legal calls, laundry services for bedding and clothing, mail, legal materials, and the law library.

**Response:** Concur. As required by ICE's 2011 PBNDS, section 2.12 “Special Management Units” (SMU), the STIPC provides recreation, legal calls, laundry services, mail, legal materials, and access to the law library to detainees placed in segregation. On December 29, 2021, ERO corrected the practice of documenting access provided to mail services from a log to a detainee’s bed card. Currently, SMU detainees have access to the commissary, and may place orders on a Monday and will receive their order within the week. Commissary orders are not documented in a detainee's bed card; however, the commissary maintains records of all purchases for record keeping. Moving forward, all





## OFFICE OF INSPECTOR GENERAL

### Department of Homeland Security

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Management Response to Draft Report: “Violations of Detention Standards at South Texas ICE Processing Center” (Project No. 21-004-SRE-ICE)

Page 5

requests for commissary services will be documented in the SMU's activity logbook, as well as whether the detainee accepted or declined a service.

The OIG's finding of use of restraints for detainees in SMU has also been addressed and corrected by ERO. The policy was updated and implemented on October 7, 2021, and training was conducted starting on October 30, 2021. Specifically, ERO updated the STIPC post orders to indicate that placement in a SMU does not constitute a valid basis for the use of restraint while in segregation, or during movement around the facility. Restraints should only be used, if necessary, as a precaution against escape during transfer, for medical reasons when directed by the medical office or to prevent self-injury, injury to others, or serious property damage. Allowing for time to record placements, ICE will provide OIG documentation corroborating these actions under a separate cover. ECD: June 30, 2022.

**Recommendation 5:** Determine ICE ERO housing requirements based on COVID-19 protocols and guaranteed minimums outlined in the contract.

**Response:** Concur. Not only does ICE ERO operate under the guidelines of the PRR and CDC guidance, as previously noted, but also the *FRAIHAT v. USICE* injunction<sup>1</sup>, entered on April 20, 2020, to ensure the safety of the detainees and maintain appropriate detention levels during the COVID-19 pandemic. In accordance with the PRR, ICE IHSC evaluates all incoming detainees and tests them for COVID-19 upon arrival at STIPC. Following intake, detainees are separated into different housing units based on their COVID-19 test results, and are placed into one of three categories:

- (1) COVID-19 positive;
- (2) COVID-19 exposed; and
- (3) COVID-19 negative and considered not to be exposed.

Once a cohort is established and placed in quarantine, ERO does not allow, or place, any other detainees in the same housing unit. ERO will then evaluate their immigration cases, and may release certain detainees due to removal, bonds or *FRAIHAT v. USICE* injunction guidelines, as appropriate. Once a housing unit completed its quarantine requirement, and IHSC has medically cleared the detainee, ERO will combine housing units to the maximum extent possible to bring the capacity to the guaranteed minimum, as defined in the contract and pursuant to PRR guidelines. Furthermore, once housing units are combined, empty housing units are thoroughly cleaned and sanitized before

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<sup>1</sup> *Frailhat v. Immigr. and Customs Enf.*, No. 19-1546, 2020 WL 6541994 (C.D. Cal. Oct. 7, 2020)



**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

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Management Response to Draft Report: "Violations of Detention Standards at South Texas ICE Processing Center" (Project No. 21-004-SRE-ICE)

Page 6

being used to house new incoming noncitizens. ICE ERO will also combine housing units to provide availability for the constant space requests from our partners on the Southwest Border, as appropriate.

In addition, ICE will continue to test detainees for COVID-19, offer vaccines to detainees not previously vaccinated, and provide masks to all detainees housed at STIPC, in accordance with ICE requirements and guidelines. Information regarding COVID-19 precautions will also continue to be provided to detainees upon arrival at STIPC, as well as broadcasted over the loudspeaker and televisions in all housing units, as previously noted, and STIPC will continue to provide reminders of the necessity to wear their masks and maintain social distance. Safety protocols have proven effective in limiting exposure to COVID-19 among detainees and ICE will adapt its protocols to continue to ensure the safety of STIPC staff and detainees, while meeting the guaranteed minimums outlined in the contract. ECD: December 30, 2022.



**Appendix C**  
**Office of Inspections and Evaluations Major Contributors to**  
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**Appendix D**  
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