

# Office of Professional Responsibility

## Boone County Jail Inspection 2025-001-012

November 19-21, 2024



U.S. Immigration  
and Customs  
Enforcement



**U.S. Department of Homeland Security**  
U.S. Immigration and Customs Enforcement  
Office of Professional Responsibility  
ICE Inspections  
Washington, DC 20536-5501

---

**Office of Detention Oversight  
Compliance Inspection  
2025-001-002**

**Enforcement and Removal Operations  
ERO Chicago Field Office**

**Boone County Jail  
Burlington, Kentucky**

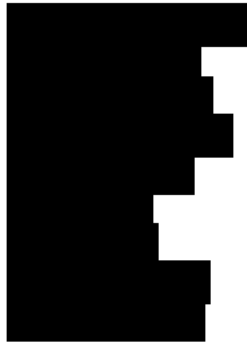
**November 19-21, 2024**

**COMPLIANCE INSPECTION**  
**of the**  
**BOONE COUNTY JAIL**  
Burlington, Kentucky

**TABLE OF CONTENTS**

<b>FACILITY OVERVIEW .....</b>	<b>4</b>
<b>COMPLIANCE INSPECTION PROCESS .....</b>	<b>5</b>
<b>FINDINGS BY NATIONAL DETENTION STANDARDS 2019 MAJOR CATEGORIES .....</b>	<b>6</b>
<b>DETAINEE RELATIONS .....</b>	<b>7</b>
<b>COMPLIANCE INSPECTION FINDINGS .....</b>	<b>7</b>
<b>CARE .....</b>	<b>7</b>
<b>MEDICAL CARE.....</b>	<b>7</b>
<b>CONCLUSION .....</b>	<b>7</b>

## COMPLIANCE INSPECTION TEAM MEMBERS



Team Lead	ODO
Senior Inspections and Compliance Specialist	ODO
Senior Inspections and Compliance Specialist	ODO
Senior Inspections and Compliance Specialist	ODO
Senior Inspections and Compliance Specialist	ODO
Contractor	Creative Corrections
Contractor	Creative Corrections
Contractor	Creative Corrections
Contractor	Creative Corrections

## FACILITY OVERVIEW

The U.S. Immigration and Customs Enforcement (ICE) Office of Professional Responsibility (OPR) Office of Detention Oversight (ODO) conducted a compliance inspection of the Boone County Jail (BCJ) in Burlington, Kentucky, from November 19 to 21, 2024.<sup>1</sup> The facility opened in 2005 and is owned by Boone County Fiscal Court and operated by Boone County Jail. The ICE Office of Enforcement and Removal Operations (ERO) began housing detainees at BCJ in 1994 under the oversight of ERO’s Field Office Director in Chicago (ERO Chicago). ICE is an authorized user of this facility under a United States Marshals Service Intergovernmental Agreement contract, which does not specify an ICE National Detention Standard (NDS). ODO inspected BCJ against the NDS 2019, which is the NDS listed on the ERO Custody Management Division Authorized Facility List as of November 18, 2024. ODO’s assigned rating is for ERO’s informational purposes only.<sup>2</sup>

[REDACTED] A county jailer handles daily facility operations and manages [REDACTED] support personnel. BCJ provides food services and medical care, and Combined Public Communications provides commissary services at the facility. In July 2020, BCJ was audited for the Department of Justice (DOJ) Prison Rape Elimination Act (PREA) and was DOJ PREA certified.

Capacity and Population Statistics	Quantity
ICE Bed Capacity <sup>3</sup>	[REDACTED]
Average ICE Population <sup>4</sup>	[REDACTED]
Adult Male Population (as of November 19, 2024)	[REDACTED]
Adult Female Population (as of November 19, 2024)	[REDACTED]

During its last rated inspection, in Fiscal Year (FY) 2024, ODO found 9 deficiencies in the following areas: Funds and Personal Property (1); Medical Care (5); Post Orders (1); and Staff-Detainee Communication (2).

<sup>1</sup> This facility holds male and female detainees with low, medium-low, medium-high, and high security classification levels for periods greater than 72 hours.

<sup>2</sup> For ODO inspections beginning in FY 2024, ERO Custody Management Division requested ODO inspect all United States Marshals Service Intergovernmental Agreement facilities, not contractually obligated to an ICE NDS, to NDS 2019.

<sup>3</sup> Data Source: ERO Custody Management Division Authorized Facility List as of November 18, 2024.

<sup>4</sup> *Ibid.*

## COMPLIANCE INSPECTION PROCESS

ODO conducts oversight inspections of ICE detention facilities with an average daily population of 10 or more, and where detainees are housed for over 72 hours, to assess compliance with ICE national detention standards. While these inspections focus on facility compliance with detention standards that directly affect detainee life, health, safety, and/or well-being, in FY 2024 ODO added additional standards to the scope of each full inspection to ensure ODO inspects every standard at each facility at least once every other year.<sup>5</sup>

ODO identifies violations of ICE detention standards, ICE policies, or operational procedures, as “deficiencies.” ODO highlights instances when the facility resolves deficiencies prior to completion of the ODO inspection. Where applicable, these corrective actions are annotated with “C” under the *Compliance Inspection Findings* section of this report.

Upon completion of each inspection, ODO conducts a closeout briefing with facility and local ERO officials to discuss preliminary findings. A summary of these findings is shared with ERO management officials. Thereafter, ODO provides ICE leadership with a final compliance inspection report to: (i) assist ERO in developing and initiating corrective action plans; and (ii) provide senior executives with an independent assessment of facility operations. ODO’s findings inform ICE executive management in their decision-making to better allocate resources across the agency’s entire detention inventory.

---

<sup>5</sup> ODO reviews the facility’s compliance with selected standards in their entirety.

## FINDINGS BY NATIONAL DETENTION STANDARDS 2019 MAJOR CATEGORIES

NDS 2019 Standards Inspected <sup>6,7</sup>	Deficiencies
<b>Part 1 - Safety</b>	
Environmental Health and Safety	0
Transportation by Land	0
<b>Sub-Total</b>	<b>0</b>
<b>Part 2 - Security</b>	
Admission and Release	0
Custody Classification System	0
Funds and Personal Property	0
Hold Rooms in Detention Facilities	0
Use of Force and Restraints	0
Special Management Units	0
Staff-Detainee Communication	0
Sexual Abuse and Assault Prevention and Intervention	0
<b>Sub-Total</b>	<b>0</b>
<b>Part 3 - Order</b>	
Disciplinary System	0
<b>Sub-Total</b>	<b>0</b>
<b>Part 4 - Care</b>	
Food Service	0
Medical Care	3
Significant Self-Harm and Suicide Prevention and Intervention	0
Terminal Illness and Death	0
Disability Identification, Assessment, and Accommodation	0
<b>Sub-Total</b>	<b>3</b>
<b>Part 5 - Activities</b>	
Recreation	0
Visitation	0
<b>Sub-Total</b>	<b>0</b>
<b>Part 6 - Justice</b>	
Detainee Handbook	0
Grievance System	0
Legal Rights Group Presentations	0
<b>Sub-Total</b>	<b>0</b>
<b>Total Deficiencies</b>	<b>3</b>

<sup>6</sup> For greater detail on ODO's findings, see the *Compliance Inspection Findings* section of this report.

<sup>7</sup> Beginning in FY 2024, ODO instituted a process of rotating all standards every other year. As a result, some standards may not be present in all inspections.

## DETAINEE RELATIONS

ODO interviewed 33 detainees, who each voluntarily agreed to participate. ODO requested to interview 12 additional detainees; however, all 12 detainees declined ODO's request for an interview. None of the detainees made allegations of discrimination, mistreatment, or abuse. All 33 detainees reported satisfaction with facility services.

## COMPLIANCE INSPECTION FINDINGS

### CARE

#### MEDICAL CARE (MC)

ODO reviewed █ detainee medical records and found in █ out of █ records, the facility did not conduct nor document comprehensive health assessments, including physical examinations and mental health screenings for all █ detainees (**Deficiency MC-27<sup>8</sup>**). **This is a repeat deficiency and a priority component.**

ODO reviewed █ detainee medical records and found in █ out of █ records, no documented initial dental screening exams for █ detainees with arrival dates of April 5, September 17, September 25, and October 29, 2024 (**Deficiency MC-43<sup>9</sup>**). **This is a repeat deficiency.**

ODO reviewed █ female detainee medical records and found in █ out of █ records, no documented pregnancy testing of a female detainee between ages 18 and 56 (**Deficiency MC-138<sup>10</sup>**). **This is a repeat deficiency.**

## CONCLUSION

During this inspection, ODO assessed the facility's compliance with 21 standards under NDS 2019 and found the facility in compliance with 20 of those standards. ODO found three deficiencies in the remaining standard. Since BCJ's last rated inspection in November 2023, the facility's overall compliance has trended upward. BCJ went from 4 deficient standards and 9 deficiencies in November 2023 to 1 deficient standard and 3 deficiencies during this most recent rated inspection. BCJ completed its uniform corrective action plan for its last rated inspection in November 2023, which may not have been effective in resolving ODO's previously cited deficiencies. ODO recommends ERO Chicago continue to work with the facility to resolve the deficiencies that remain outstanding in accordance with contractual obligations.

---

<sup>8</sup> "The facility will conduct and document a comprehensive health assessment, including a physical examination and mental health screening, on each detainee within 14 days of the detainee's arrival at the facility." *See* ICE NDS 2019, Standard, Medical Care, Section (II)(E).

<sup>9</sup> "An initial dental screening exam shall be performed within 14 days of the detainee's arrival." *See* ICE NDS 2019, Standard, Medical Care, Section (II)(H).

<sup>10</sup> "In addition to the criteria listed on the health assessment form, the evaluation shall inquire about and perform the following:

a. Pregnancy test for detainees aged 18-56 and deliver to the detainee and document the results;" *See* ICE NDS 2019, Standard, Medical Care, Section (II)(U)(1)(a).



<b>Compliance Inspection Results Compared</b>	<b>FY 2024 Full Inspection (NDS 2019)</b>	<b>FY 2025 Full Inspection (NDS 2019)</b>
Standards Reviewed	24	21
Deficient Standards	4	1
Overall Number of Deficiencies	9	3
Priority Component Deficiencies	2	1
Repeat Deficiencies	0	3
Areas Of Concern	0	0
Corrective Actions	1	0
Facility Rating	Good	Good



U.S. Immigration  
and Customs  
Enforcement

## Office of Professional Responsibility

