

# Office of Professional Responsibility

## Houston Contract Detention Facility Compliance Inspection 2025-001-068

January 28-30, 2025



U.S. Immigration  
and Customs  
Enforcement

**COMPLIANCE INSPECTION**  
**of the**  
**HOUSTON CONTRACT DETENTION FACILITY**  
Houston, Texas

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## COMPLIANCE INSPECTION TEAM MEMBERS

[REDACTED]	Team Lead	ODO
[REDACTED]	Senior Inspections and Compliance Specialist	ODO
[REDACTED]	Senior Inspections and Compliance Specialist	ODO
[REDACTED]	Senior Inspections and Compliance Specialist	ODO
[REDACTED]	Inspections and Compliance Specialist	ODO
[REDACTED]	Section Chief	ODO
[REDACTED]	Section Chief	ODO
[REDACTED]	Contractor	Creative Corrections
[REDACTED]	Contractor	Creative Corrections
[REDACTED]	Contractor	Creative Corrections
[REDACTED]	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 Houston Contract Detention Facility (HCDF) in Houston, Texas, from January 28 to 30, 2025.<sup>1</sup> The facility opened in 1984 and is owned and operated by CoreCivic. The ICE Office of Enforcement and Removal Operations (ERO) began housing detainees at HCDF in 1984 under the oversight of ERO's Field Office Director in Houston (ERO Houston). The facility operates under the Performance-Based National Detention Standards (PBNDS) 2011 (Revised 2016).

[REDACTED] A warden handles daily facility operations and manages [REDACTED] support personnel. Trinity Services provides food services, ICE Health Service Corps provides medical care, and CoreCivic provides commissary services at the facility. The facility was accredited by the American Correctional Association in August 2019 and the National Commission on Correctional Health Care in September 2024. In January 2025, HCDF was audited for the Department of Homeland Security (DHS) Prison Rape Elimination Act (PREA) and was DHS PREA certified.

Capacity and Population Statistics	Quantity
ICE Bed Capacity <sup>2</sup>	[REDACTED]
Average ICE Population <sup>3</sup>	[REDACTED]
Adult Male Population (as of January 28, 2025)	[REDACTED]
Adult Female Population (as of January 28, 2025)	[REDACTED]

During its last rated inspection, in Fiscal Year (FY) 2024, ODO found 10 deficiencies in the following areas: Law Libraries and Legal Materials (2); Post Orders (6); Religious Practices (1); and Telephone Access (1).

<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> Data Source: ERO Custody Management Division Authorized Facility List as of January 28, 2025.

<sup>3</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>4</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.

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<sup>4</sup> ODO reviews the facility’s compliance with selected standards in their entirety.

## FINDINGS BY PERFORMANCE-BASED NATIONAL DETENTION STANDARDS 2011 (REVISED 2016) MAJOR CATEGORIES

PBNDs 2011 (Revised 2016) Standards Inspected <sup>5,6</sup>	Deficiencies
<b>Part 1 - Safety</b>	
Emergency Plans	0
Environmental Health and Safety	1
Transportation (By Land)	1
<b>Sub-Total</b>	<b>2</b>
<b>Part 2 - Security</b>	
Admission and Release	0
Custody Classification System	0
Contraband	0
Funds and Personal Property	0
Hold Rooms in Detention Facilities	0
Key and Lock Control	0
Sexual Abuse and Assault Prevention and Intervention	0
Special Management Units	0
Staff-Detainee Communication	0
Tool Control	0
Use of Force and Restraints	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	2
Medical Care	0
Medical Care (Women)	0
Significant Self-harm and Suicide Prevention and Intervention	0
Terminal Illness, Advance Directives and Death	0
Disability Identification, Assessment, and Accommodation	0
<b>Sub-Total</b>	<b>2</b>
<b>Part 5 - Activities</b>	
Recreation	0
Visitation	0
<b>Sub-Total</b>	<b>0</b>

<sup>5</sup> For greater detail on ODO's findings, see the *Compliance Inspection Findings* section of this report.

<sup>6</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.

<b>Part 6 - Justice</b>	
Detainee Handbook	0
Grievance System	1
Legal Rights Group Presentations	0
<b>Sub-Total</b>	<b>1</b>
<b>Part 7 - Administration and Management</b>	
Interview and Tours	0
Staff Training	0
<b>Sub-Total</b>	<b>0</b>
<b>Total Deficiencies</b>	<b>5</b>

## DETAINEE RELATIONS

ODO interviewed 40 detainees, who each voluntarily agreed to participate. None of the detainees made allegations of discrimination, mistreatment, or abuse. All detainees reported satisfaction with facility services.

## COMPLIANCE INSPECTION FINDINGS

### SAFETY

#### ENVIRONMENTAL HEALTH AND SAFETY (EHS)

ODO toured the food service department and found:

- Water droplets caused by condensation on the ventilation hood pipes directly above two 60-gallon steam kettles;
- Rusted and peeling fire suppression metal pipes directly above two tilt skillets; and
- No routine cleaning of floors, walls, and ceilings, to include an air conditioning ventilation cover and a pan rack (**Deficiency EHS-11**).<sup>7</sup>

#### TRANSPORTATION (BY LAND) (TBL)

ODO interviewed facility staff, reviewed the facility’s transportation policy, inspected transportation vehicles, and found the facility does not equip transportation officers with portable radios (**Deficiency TBL-149**).<sup>8</sup>

<sup>7</sup> “The facility administrator shall ensure that staff and detainees maintain a high standard of facility sanitation and general cleanliness. When possible, the use of non-toxic cleaning supplies is recommended.” See ICE PBNDS 2011 (Revised 2016), Standard, Environmental Health and Safety, Section (V)(A)(3).

<sup>8</sup> “Every crew shall also carry at least one portable radio, so that officers can maintain contact if one or more must leave the vehicle.” See ICE PBNDS 2011 (Revised 2016), Standard, Transportation (By Land), Section (V)(M).

## CARE

### **FOOD SERVICE (FS)**

ODO toured the FS department and found water droplets condensing on the ventilation hood pipes directly above two 60-gallon steam kettles (**Deficiency FS-313<sup>9</sup>**).

ODO toured the FS department and found dirt and dust on an air conditioning ventilation cover and a pan rack (**Deficiency FS-314<sup>10</sup>**).

## JUSTICE

### **GRIEVANCE SYSTEM (GS)**

ODO reviewed the facility's grievance log and found in 12 out of 25 grievances logged, the facility responded to each grievance in 6 days (**Deficiency GS-57<sup>11</sup>**).

## **CONCLUSION**

During this inspection, ODO assessed the facility's compliance with 28 standards under PBNDS 2011 (Revised 2016) and found the facility in compliance with 24 of those standards. ODO found five deficiencies in the remaining four standards. Since HCDF's last rated inspection in January 2024, the facility's compliance with PBNDS 2011 (Revised 2016) has trended upward. HCDF went from 4 deficient standards and 10 deficiencies in January 2024 to 4 deficient standards and 5 deficiencies during this most recent full inspection. ODO received HCDF's completed uniform corrective action plan for HCDF's last inspection in January 2024, which likely resolved previous deficiencies ODO cited. ODO recommends ERO Houston continue to work with the facility to resolve the deficiencies that remain outstanding in accordance with contractual obligations.

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<sup>9</sup> "Overhead pipes must be removed or covered to eliminate the food-safety hazard posed by leaking or dusty pipes." See ICE PBNDS 2011 (Revised 2016), Standard, Food Service, Section (V)(J)(5)(b).

<sup>10</sup> "Walls, floors and ceilings in all areas must be cleaned routinely." See ICE PBNDS 2011 (Revised 2016), Standard, Food Service, Section (V)(J)(5)(c).

<sup>11</sup> "Detainee shall be provided with a written or oral response within five days of receipt of the grievance." See ICE PBNDS 2011 (Revised 2016), Standard, Grievance System, Section (V)(C)(3)(b)(1)(b).



<b>Compliance Inspection Results Compared</b>	<b>FY 2024 Full Inspection (PBNDS 2011) (Revised 2016)</b>	<b>FY 2025 Full Inspection (PBNDS 2011) (Revised 2016)</b>
Standards Reviewed	30	28
Deficient Standards	4	4
Overall Number of Deficiencies	10	5
Priority Component Deficiencies	0	0
Repeat Deficiencies	0	0
Areas Of Concern	0	0
Corrective Actions	0	0
Facility Rating	Good	Superior



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