



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
Follow-Up Compliance Inspection
2024-002-325**

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

**Joe Corley Processing Center
Conroe, Texas**


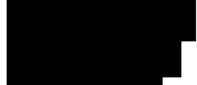
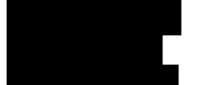
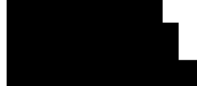


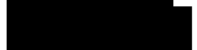

June 25-27, 2024

FOLLOW-UP COMPLIANCE INSPECTION
of the
JOE CORLEY PROCESSING CENTER
Conroe, Texas

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FOLLOW-UP COMPLIANCE INSPECTION TEAM MEMBERS

	Team Lead	ODO
	Senior Inspections and Compliance Specialist	ODO
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	Section Chief	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 follow-up compliance inspection of the Joe Corley Processing Center (JCPC) in Conroe, Texas, from June 25 to 27, 2024.¹ This inspection focused on the standards found deficient during ODO’s last inspection of JCPC from December 12 to 14, 2023. The facility opened in 2008 and is owned and operated by the GEO Group, Inc. (GEO). The ICE Office of Enforcement and Removal Operations (ERO) began housing detainees at JCPC in 2008 under the oversight of ERO’s Field Office Director in Houston (ERO Houston). The facility operates under the National Detention Standards (NDS) 2019.

[REDACTED] A facility administrator handles daily operations and manages [REDACTED] support personnel. GEO provides food services and medical care, and Keefe Commissary provides commissary services at the facility. The facility was accredited by the National Commission on Correctional Health Care in June 2018, the American Correctional Association in January 2019, and the Department of Homeland Security (DHS) Prison Rape Elimination Act (PREA) in August 2021. In June 2018, JCPC was audited for the DHS PREA and was DHS PREA certified.

Capacity and Population Statistics	Quantity
ICE Bed Capacity ²	[REDACTED]
Average ICE Population ³	[REDACTED]
Adult Male Population (as of June 25, 2024)	[REDACTED]
Adult Female Population (as of June 25, 2024)	[REDACTED]

During its last full inspection, in Fiscal Year (FY) 2024, ODO found 0 deficiencies.

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

² Data Source: ERO Custody Management Division Authorized Facility List as of June 17, 2024.

³ *Ibid.*

FOLLOW-UP COMPLIANCE INSPECTION PROCESS

ODO conducts biannual oversight inspections of ICE detention facilities with an average daily population (ADP) of 10 or more detainees, and where detainees are housed for longer than 72-hours, to assess compliance with ICE National Detention Standards. In FY 2021, to meet congressional requirements, ODO began conducting follow-up inspections at all over-72-hour ICE detention facilities with an ADP of 10 or more detainees that ODO conducted a full inspection of earlier in the FY. Follow-up inspections focus on facility compliance with detention standards that directly affect detainee life, health, safety, and/or well-being, and other standards ODO found deficient during the previous rated inspection to assess the facility's corrective actions taken to address those previously cited deficiencies.⁴

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.

While follow-up inspections are intended to focus on previously identified deficiencies, ODO will conduct a complete review of several core standards, which include but are not limited to Medical Care, Hunger Strikes, Suicide Prevention, Food Service, Environmental Health and Safety, Emergency Plans, Use of Force and Restraints/Use of Physical Control Measures and Restraints, Admission and Release, Classification, and Funds and Personal Property. ODO may decide to conduct a second full inspection of a facility in the same FY based on additional information obtained prior to ODO's arrival on-site. Factors ODO will consider when deciding to conduct a second full inspection will include the total number of deficiencies cited during the first inspection, the number of deficient standards found during the first inspection, the completion status of the first inspection's uniform corrective action plan (UCAP), and other information ODO obtains from internal and external sources ahead of the follow-up compliance inspection. Conditions found during the inspection may also lead ODO to assess new areas and identify new deficiencies or areas of concern should facility practices run contrary to ICE standards. Any areas found non-compliant during both the full and follow-up inspection are annotated as "Repeat Deficiencies" in this report.

⁴ ODO reviews the facility's compliance with selected standards in their entirety.

FINDINGS BY NATIONAL DETENTION STANDARDS 2019 MAJOR CATEGORIES

NDS 2019 Standards Inspected ^{5,6}	Deficiencies
Part 1 - Safety	
Environmental Health and Safety	2
Sub-Total	2
Part 2 - Security	
Admission and Release	0
Custody Classification System	0
Facility Security and Control	0
Funds and Personal Property	0
Use of Force and Restraints	0
Special Management Units	0
Staff-Detainee Communication	0
Sub-Total	0
Part 4 - Care	
Food Service	3
Hunger Strikes	0
Medical Care	0
Personal Hygiene	0
Significant Self-Harm and Suicide Prevention and Intervention	0
Terminal Illness and Death	0
Sub-Total	3
Part 5 - Activities	
Recreation	0
Telephone Access	0
Sub-Total	0
Part 6 - Justice	
Grievance System	0
Sub-Total	0
Total Deficiencies	5

⁵ For greater detail on ODO's findings, see the *Follow-up Compliance Inspection Findings* section of this report.

⁶ 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 31 detainees, who each voluntarily agreed to participate. ODO attempted to interview another detainee that spoke only Tachelhit, but Lion Bridge did not have an available interpreter. None of the detainees made allegations of discrimination, mistreatment, or abuse. Most detainees reported satisfaction with facility services except for the concern listed below.

Significant Self-Harm and Suicide Prevention and Intervention: One detainee stated he had thoughts of harming himself.

- Action Taken: ODO immediately ended the interview, requested facility staff take the detainee to the medical department, and notified ERO Houston of the detainee's issue. On June 27, 2024, ODO interviewed the medical director, reviewed the detainee's mental health evaluation record, and confirmed medical staff evaluated the detainee on June 24, 2024. The detainee's medical record indicated a suicide ideation 3 months prior to the evaluation but no current suicidal thoughts. His record also identified him as a victim of a violent crime and sexual abuse in his home country. The record noted a referral to a psychiatrist for 30 days. Medical staff did not place the detainee under observation and advised him to use a sick call request should he need to speak to a mental health representative. Staff used an interpreter during the evaluation, and the detainee verbalized understanding.

FOLLOW-UP COMPLIANCE INSPECTION FINDINGS

SAFETY

ENVIRONMENTAL HEALTH AND SAFETY (EHS)

ODO reviewed JCPC policies, 25 weekly inspection reports, toured the facility to include 46 detainee housing units, and found the facility's environmental health conditions in the housing units did not meet recognized standards of hygiene. Specifically, in the showers, toilets, and housing unit common areas, ODO found 20 out of 46 units had vents with significant dust buildup; 10 out of 46 units with vents covered with a homemade plaster-like substance; toilets in 16 out of 46 units were soiled with dirt, grime, and/or human waste; 26 out of 46 housing unit common area and restroom area floors were littered with debris, dirt and grime buildup; all 46 housing units had paper/tape covering light fixtures; 29 out of 46 housing units had shower drains covered with hair and debris; 17 out of 46 housing units had missing ceramic tiles; and 29 out of 46 showers had grime and soap scum buildup (**Deficiency EHS-58⁷**).

ODO reviewed JCPC policies, 25 weekly inspection reports, toured the facility to include 46 detainee housing units, and found the facility did not maintain overall cleanliness and sanitation levels, nor keep all surfaces, fixtures, and equipment clean and in good repair. Specifically, in the showers, toilets, and housing unit common areas, ODO found 20 out of 46 units had vents with

⁷ "Environmental health conditions will be maintained at a level that meets recognized standards of hygiene." See ICE NDS 2019, Standard, Environmental Health and Safety, Section (II)(I).

significant dust buildup; 10 out of 46 units with vents covered with a homemade plaster-like substance; toilets in 16 out of 46 units were soiled with dirt, grime, and/or human waste; 26 out of 46 housing unit common area and restroom area floors were littered with debris, dirt and grime buildup; all 46 housing units had paper/tape covering light fixtures; 29 out of 46 housing units had shower drains covered with hair and debris; 17 out of 46 housing units had missing ceramic tiles; and 29 out of 46 showers had grime and soap scum buildup (**Deficiency EHS-64⁸**).

SECURITY

STAFF-DETAINEE COMMUNICATION (SDC)

On June 25, 2024, ODO attempted to interview a Moroccan detainee who spoke only Tachelhit, but Lion Bridge did not have an available Tachelhit interpreter. On the same day, ODO requested the facility's assistance in obtaining an interpreter, but the facility was unable to connect with an available Tachelhit interpreter. On June 26, 2024, ODO emailed a follow-up request to the facility's compliance administrator, and the compliance manager responded on the same day by stating ERO provides access to a Tachelhit translator during the detainee's court appearance. ODO noted this issue as an **Area of Concern**.

CARE

FOOD SERVICE (FS)

ODO reviewed JCPC policy, 26 weekly sanitation inspections, toured and inspected all areas of FS operations, and found the following deficiencies:

- No cleaning measures followed to meet environmental standards. ODO found kitchen work areas and walls with food debris splatter and grime buildup, kitchen floors with trash (hairnets, beard protectors, mop strings) and food debris, and ceilings with significant dirt, dust buildup, and condensate water. In addition, ventilation hoods had grime, grease buildup and condensate water, and a food cooler had boxes stored above the 18-inch clearance underneath sprinkler deflectors (**Deficiency FS-91⁹**);
- No cleaning measures followed to prevent cross contamination. ODO found one mixer, two grills, six ovens, two steam kettles, four food preparation tables, four Cambro beverage dispensers, and four Cambro beverage dispenser lids with food debris splatter

⁸ "General: Facility cleanliness and sanitation shall be maintained. All surfaces, fixtures, and equipment shall be kept clean and in good repair." See ICE NDS 2019, Standard, Environmental Health and Safety, Section (II)(I)(2).

⁹ "All facilities shall meet the following environmental standards:

- a. Clean, well-lit, and orderly work and storage areas.
- b. Overhead pipes removed or covered, to eliminate the food-safety hazard posed by leaking or dusty pipes.
- c. Routinely cleaned walls, floors, and ceilings in all areas.
- d. Ventilation hoods, to prevent grease buildup and wall/ceiling condensation that can drip into food or onto food-contact surfaces. Filters or other grease-extracting equipment shall be readily removable for cleaning and replacement.
- e. Eighteen-inch clearance (minimum) underneath sprinkler deflectors."

See ICE NDS 2019, Standard, Food Service, Section (II)(I)(5)(a-e).

and grime buildup. In addition, the kitchenware and food-contact surfaces were not in use during these observations (**Deficiency FS-92**¹⁰); and

- No cleaning of the hood systems by FS staff after each use to prevent grease build-up (**Deficiency FS-114**¹¹).

CONCLUSION

During this follow-up inspection, ODO assessed the facility’s compliance with 17 standards under NDS 2019 and found the facility in compliance with 15 of those standards. ODO found five deficiencies in the remaining two standards. Since JCPC’s last full inspection in December 2023, the facility’s compliance with NDS 2019 has trended downward. JCPC went from no deficiencies in December 2023 to 2 deficient standards and 5 deficiencies during this follow-up compliance inspection. ODO noted a higher employee turnover rate between this inspection and the FY 2024 rated inspection, which likely contributed to the newly identified deficiencies. ODO identified no deficiencies during the previous inspection of JCPC and did not require a UCAP for that inspection. ODO recommends ERO Houston work with the facility to resolve any deficiencies in accordance with contractual obligations.

Compliance Inspection Results Compared	FY 2024 Full Inspection (NDS 2019)	FY 2024 Follow-Up Inspection (NDS 2019)
Standards Reviewed	24	17
Deficient Standards	0	2
Overall Number of Deficiencies	0	5
Priority Component Deficiencies	0	0
Repeat Deficiencies	0	0
Areas Of Concern	0	1
Corrective Actions	0	0
Facility Rating	Superior	N/A

¹⁰ “h. To prevent cross-contamination, kitchenware, and food-contact surfaces should be washed, rinsed, and sanitized after each use and after any interruption of operations during which contamination could occur.” See ICE NDS 2019, Standard, Food Service, Section (II)(I)(5)(h).

¹¹ “Hood systems shall be cleaned after each use to prevent grease build-ups, which constitute fire risks.” See ICE NDS 2019, Standard, Food Service, Section (II)(I)(10)(d).