

# Office of Professional Responsibility

## Knox County Detention Facility Inspection 2024-003-403

September 24–26, 2024



U.S. Immigration  
and Customs  
Enforcement



**U.S. Department of Homeland Security**  
U.S. Immigration and Customs Enforcement  
Office of Professional Responsibility  
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Office of Detention Oversight  
Special Review  
2024-003-403

Enforcement and Removal Operations  
ERO New Orleans Field Office

Knox County Detention Facility  
Knoxville, Tennessee

September 24-26, 2024

**SPECIAL REVIEW  
of the  
KNOX COUNTY DETENTION FACILITY  
Knoxville, Tennessee**

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## SPECIAL REVIEW TEAM MEMBERS



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## FACILITY OVERVIEW

The U.S. Immigration and Customs Enforcement (ICE) Office of Professional Responsibility (OPR) Office of Detention Oversight (ODO) conducted a special review of the Knox County Detention Facility (KCDF) in Knoxville, Tennessee, from September 24 to 26, 2024.<sup>1</sup> The facility opened in 1994 and is owned and operated by Knox County Sheriff's Office. The ICE Office of Enforcement and Removal Operations (ERO) began housing detainees at KCDF in 2017 under the oversight of ERO's Field Office Director in New Orleans (ERO New Orleans). 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), and ODO inspected to the NDS listed on the ERO Custody Management Division Authorized Facility List as of September 16, 2024. KCDF was inspected against the NDS 2019, and ODO's assigned rating is for ERO's informational purposes only.

[REDACTED] A KCDF captain handles daily facility operations and manages [REDACTED] support personnel. Knox County provides food services, medical care, and commissary services at the facility. The facility does not hold accreditations from any outside entities. In January 2023, KCDF 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>2</sup>	[REDACTED]
Average ICE Population <sup>3</sup>	[REDACTED]
Adult Male Population (as of September 24, 2024)	[REDACTED]
Adult Female Population (as of September 24, 2024)	[REDACTED]

This was ODO's first compliance inspection of Knox County Detention Facility.

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

<sup>2</sup> Data Source: ERO Custody Management Division Authorized Facility List as of September 23, 2024.

<sup>3</sup> *Ibid.*

## SPECIAL REVIEW PROCESS

ODO conducts oversight inspections of ICE detention facilities with an average daily population (ADP) 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 *Special Review Findings* section of this report.

In FY 2022, ODO began conducting special reviews of under 72-hour ICE detention facilities with an ADP of 1 or more detainees and over 72-hour ICE detention facilities with an ADP of 1 to 9 detainees. Additionally, ODO began conducting unannounced inspections of ICE detention facilities, regardless of ADP of detainees, as well as reviews of ICE special/emerging detention facilities/programs. As such, these facility inspections will result in an ODO Inspection Compliance Rating; however, for facilities that are not contractually obligated to an ICE NDS, those ratings will be for ERO’s informational purposes. ODO will conduct a complete review of several core standards, in accordance with the facility’s contractually required ICE NDS or in accordance with the ICE NDS listed in the current ERO Custody Management Division Authorized Facility List for facilities that are not contractually obligated to an ICE NDS, which may include but are not limited to Medical Care/Health Care, Medical Care (Women)/Health Care (Females), Significant Self-harm and Suicide Prevention and Intervention, Hunger Strikes, Food Service, Environmental Health and Safety, Special Management Units (SMU) or Hold Rooms (if the facility does not have an SMU), Use of Force and Restraints/Use of Physical Control Measures, and Sexual Abuse and Assault Prevention and Intervention.

Upon completion of each special review or unannounced 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 uniform corrective action plans (UCAPs); 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 NATIONAL DETENTION STANDARDS 2019 MAJOR CATEGORIES

NDS 2019 Standards Inspected <sup>5,6,7</sup>	Deficiencies
<b>Part 1 - Safety</b>	
Environmental Health and Safety	0
<b>Sub-Total</b>	<b>0</b>
<b>Part 2 - Security</b>	
Use of Force and Restraints	0
Special Management Units	0
Sexual Abuse and Assault Prevention and Intervention	0
<b>Sub-Total</b>	<b>0</b>
<b>Part 4 - Care</b>	
Food Service	1
Hunger Strikes	0
Medical Care	6
Personal Hygiene	0
Significant Self-Harm and Suicide Prevention and Intervention	0
<b>Sub-Total</b>	<b>7</b>
<b>Part 5 - Activities</b>	
Recreation	0
<b>Sub-Total</b>	<b>0</b>
<b>Total Deficiencies</b>	<b>7</b>

<sup>5</sup> For greater detail on ODO’s findings, see the *Special Review 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.

<sup>7</sup> During a special review, ODO will review a facility’s compliance with at least 10 individual standards.

## DETAINEE RELATIONS

The facility's ICE detainee population count was zero during the inspection; therefore, ODO did not conduct any detainee interviews. Despite the facility housing no detainees during the special review, the facility maintains an active contract to house ICE detainees and had an ADP of 2 for FY 2023, meeting the ODO requirement for special reviews.

## SPECIAL REVIEW FINDINGS

### CARE

#### FOOD SERVICE (FS)

ODO toured the facility's FS area and found the food mixer did not have a safety guard (**Deficiency FS-108<sup>8</sup>**).

#### MEDICAL CARE (MC)

ODO reviewed [REDACTED] detainee medical records and found the following deficiencies:

- In [REDACTED] out of [REDACTED] records, no initial medical, dental, and mental health screening was completed for a detainee after their arrival at KCDF (**Deficiency MC-12<sup>9</sup>**). **This is a priority component;**
- In [REDACTED] out of [REDACTED] records, a licensed practical nurse (LPN) completed health assessments but the LPN had no training nor practice in conducting an assessment as required by the Tennessee Board of Nursing (**Deficiency MC-28<sup>10</sup>**);
- In [REDACTED] out of [REDACTED] records, no physical examination nor review of those examinations by a facility medical provider (**Deficiency MC-29<sup>11</sup>**);
- In [REDACTED] out of [REDACTED] records, no specific signed and dated consent forms from detainees before any medical examination or treatment (**Deficiency MC-92<sup>12</sup>**). **This is a priority component;**
- In the facility handbook, no reference to detainees requesting and receiving their

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<sup>8</sup> "Machines shall be guarded in compliance with OSHA standards." See ICE NDS 2019, Standard, Food Service, Section (II)(I)(10).

<sup>9</sup> "As soon as possible, but no later than 12 hours after arrival, all detainees shall receive, by a health care practitioner or a specially trained detention officer, an initial medical, dental and mental health screening and be asked for information regarding any known acute, emergent, or pertinent past or chronic medical conditions, including history of mental illness, particularly prior suicide attempts or current suicidal/homicidal ideation or intent, and any disabilities or impairments affecting major life activities." See ICE NDS 2019, Standard, Medical Care, Section (II)(D).

<sup>10</sup> "Health assessments shall be performed by a physician, physician assistant, nurse practitioner, registered nurse (RN) (with documented initial and annual training provided by a physician), or other health care practitioner, as permitted by law." See ICE NDS 2019, Standard, Medical Care, Section (II)(E).

<sup>11</sup> "When a physical examination is not conducted by a provider, it must be reviewed by a provider." See ICE NDS 2019, Standard, Medical Care, Section (II)(E).

<sup>12</sup> "The facility health care practitioner will obtain specific signed and dated consent forms from all detainees before any medical examination or treatment, except in emergency circumstances." See ICE NDS 2019, Standard, Medical Care, Section (II)(O).



- medical records (**Deficiency MC-102**<sup>13</sup>); and
- In [redacted] out of [redacted] records, no female, initial health assessment (**Deficiency MC-137**<sup>14</sup>).

## CONCLUSION

During this special review, ODO assessed the facility’s compliance with 10 standards under NDS 2019 and found the facility in compliance with 8 of those standards. ODO found seven deficiencies in the remaining two standards. ODO also noted two priority components in the MC standard. Because ODO inspected KCDF for the first time, it performed no trend analysis of this facility. ODO recommends ERO New Orleans work with the facility to resolve any deficiencies that remain outstanding in accordance with contractual obligations.

Compliance Inspection Results Compared	No Previous ODO Inspection	FY 2024 Special Review (NDS 2019)
Standards Reviewed	N/A	10
Deficient Standards	N/A	2
Overall Number of Deficiencies	N/A	7
Priority Component Deficiencies	N/A	2
Repeat Deficiencies	N/A	N/A
Areas Of Concern	N/A	0
Corrective Actions	N/A	0
Facility Rating	N/A	Good

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<sup>13</sup> “Detainees and their representatives shall be allowed to request and receive medical records pursuant to facility policy, which shall be communicated to the detainee in the facility handbook.” See ICE NDS 2019, Standard, Medical Care, Section (II)(P).

<sup>14</sup> “All initial health assessments of female detainees shall be conducted by a qualified health care practitioner.” See ICE NDS 2019, Standard, Medical Care, Section (II)(U)(1).



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