

# Progress in Implementing 2011 PBNDS Standards and DHS PREA Requirements at Detention Facilities

March 19, 2018
Fiscal Year 2017 Report to Congress

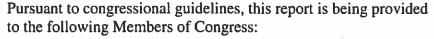


### Message from the Deputy Director and Senior Official Performing the Duties of the Director

March 19, 2018

I am pleased to present the following report, "Progress in Implementing 2011 PBNDS Standards and DHS PREA Requirements at Detention Facilities," which has been prepared by U.S. Immigration and Customs Enforcement (ICE).

This report was compiled pursuant to requirements in the Joint Explanatory Statement and House Report 114-668, which accompany the Fiscal Year 2017 Department of Homeland Security (DHS) Appropriations Act (P.L. 115-31).





The Honorable John R. Carter Chairman, House Appropriations Subcommittee on Homeland Security

The Honorable Lucille Roybal-Allard Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable John Boozman Chairman, Senate Appropriations Subcommittee on Homeland Security

The Honorable John Tester
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

Inquiries related to this report may be directed to me at (202) 732-3000 or to the Department's Acting Chief Financial Officer, Stacy Marcott, at (202) 447-5751.

Sincerely,

Thomas D. Homan

Deputy Director and Senior Official Performing the Duties

of the Director

U.S. Immigration and Customs Enforcement



## Progress in Implementing 2011 PBNDS Standards and DHS PREA Requirements at Detention Facilities Fiscal Year 2017

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#### I. Legislative Requirement

This report was compiled in response to the Joint Explanatory Statement and House Report 114-668, which accompany the Fiscal Year (FY) 2017 Department of Homeland Security (DHS) Appropriations Act (P.L. 115-31).

The Joint Explanatory Statement says:

Within 45 days after the enactment of this Act, ICE shall report on its progress in implementing the 2011 Performance Based National Detention Standards, including the 2016 revisions, and requirements related to the Prison Rape Elimination Act, as detailed in the House report.

#### House Report 114-668 states:

Within 45 days after the date of enactment of this Act, ICE shall report on its progress in implementing the 2011 PBNDS and requirements related to PREA, including a list of facilities that are not yet in compliance; a schedule for bringing facilities into compliance; and current year and estimated future year costs associated with compliance.

#### II. Background

U.S. Immigration and Customs Enforcement (ICE) enforces federal laws governing border control, customs, trade, and immigration to promote homeland security and public safety. Through its Enforcement and Removal Operations (ERO), ICE identifies and apprehends removable aliens, detains them, and effectuates their removal from the United States.

Detention is a necessary tool that ICE uses to accomplish its important mission. Over the last 20 years, the Nation's immigration detention system has changed significantly—growing from an average daily population (ADP) of fewer than 7,500 detainees in FY 1995 to an ADP of 38,106 detainees for FY 2017.

Currently, ICE uses three sets of adult detention standards, as detailed below, to govern conditions of detention in its facilities. These standards specify the living conditions appropriate for detainees and ensure that detainees are treated with respect and dignity, and are provided the best possible care while in ICE custody.

The detention standards for a given facility are determined by considerations such as the facility's size, type, capacity to adhere to certain requirements, staffing, and actual or potential associated costs of executing physical or operational changes. Detention standards apply to a facility through the contract period, following negotiation between ICE and the contractor or locality operating the facility. The majority of ICE facilities receive an annual inspection to ensure compliance with the relevant detention standards.

The National Detention Standards (NDS) issued in 2000 established consistent conditions of confinement, program operations, and management expectations within ICE's detention system. Today, NDS most frequently is applicable at county or city jails used by ICE pursuant to an intergovernmental service agreement (IGSA) or U.S. Marshals Service (USMS) Intergovernmental Agreement (IGA).

In 2008, ICE revised the NDS by creating the Performance-Based National Detention Standards (PBNDS) 2008. These updated standards, which were developed by a multidisciplinary ICE working group that also included other departmental stakeholders such as the DHS Office for Civil Rights and Civil Liberties (CRCL), delineate the results or outcomes to be achieved and enhanced safety, security, and conditions of confinement for detainees. The PBNDS 2008 prescribe both the expected outcomes of each detention standard and the expected practices required to achieve them.

In October 2009, DHS and ICE announced a series of detention reform initiatives as part of an ongoing effort to enhance the security and efficiency of the immigration detention system while prioritizing the health, safety, and well-being of detainees. These reforms—which were outlined in the October 2009 report to Congress, *Immigration Detention Overview and Recommendations*, and updated in the July 2012 report to Congress, *Detention Process Improvement and Reform*—included the following recommendation, which has become a key agency initiative:

In coordination with stakeholders, ICE should develop a new set of standards, assessments, and classification tools to inform care, custody restrictions, privileges, programs, and delivery of services consistent with risk level and medical care needs of the population. ICE should expand access to legal materials and counsel, visitation, and religious practice.

On February 27, 2012, ICE issued PBNDS 2011. ICE tailored these revised standards—developed in collaboration with ICE personnel, numerous agency stakeholders, and DHS CRCL—to meet the needs of its diverse detention population. Since that time, ICE has implemented PBNDS 2011 successfully at 31 facilities, representing almost 60 percent of ICE's FY 2017 ADP.

On January 11, 2017, ICE issued a revised version of PBNDS 2011. The revisions were developed in coordination with the agency stakeholders and CRCL, incorporate legal and regulatory requirements, and update text to match existing ICE and ERO policies. The major revisions covered: full implementation of the DHS standards, disability accommodation, language access and communication assistance, disciplinary system and special management units, suicide prevention, detainees with serious mental illness, tracking and reporting assaults, identification and monitoring of pregnant detainees, religious meals, and use of force at detention facilities.

ICE requested adoption of the revisions for detention facilities covered by PBNDS 2011 through a bilateral contract modification of the facility's contract. All PBNDS 2011 facilities also were informed that they would be inspected against the new requirements by June 30, 2017.

As of November 29, 2017, 26 of the 30<sup>1</sup> applicable detention facility contracts requiring the revised version of PBNDS 2011 have been modified to incorporate the revisions. ICE is working with the remaining facilities on adoption and expects the final modifications to be complete by the end of FY 2018.

On March 7, 2014, DHS issued Final Rule, 6 CFR Part 115, Standards to Prevent, Detect, and Respond to Sexual Abuse and Assault in Confinement Facilities, also known as the DHS (Prison Rape Elimination Act of 2003 (PREA) Standards. The DHS PREA Standards establish robust safeguards against sexual abuse and assault of individuals in DHS custody. Meeting a commitment made in the preamble to the DHS PREA Standards, ICE implemented the standards through contract modifications at all ICE-dedicated detention facilities. The DHS PREA Standards are binding at 38 facilities. These facilities house 67 percent of FY 2017 ICE ADP,

<sup>&</sup>lt;sup>1</sup> Two additional facilities were contacted but are no longer in use by ICE, so the modification was not pursued for these two. One additional facility signed onto PBNDS 2011 following the issuance of the revisions so a modification was not necessary; this new facility is included in other areas of this report, which lists a total of 31 facilities operating under the PBNDS 2011.

<sup>&</sup>lt;sup>2</sup> Dedicated detention facilities are those that exclusively house ICE detainees.

and 85 percent of the ICE ADP when excluding detainees held in USMS-contracted facilities (which are covered by the U.S. Department of Justice (DOJ) PREA regulation).<sup>3</sup>

This report provides an update on ICE's progress in implementing PBNDS 2011 and the DHS PREA Standards at ICE detention facilities.

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<sup>&</sup>lt;sup>3</sup> The preamble to the DHS PREA Standards states that the standards "do not apply to facilities used by ICE pursuant to an agreement with a DOJ entity (e.g., BOP facilities) or between a DOJ entity (e.g., USMS) and a state or local government or private entity . . . because they are not 'operated by or pursuant to contract with U.S. Immigration and Customs Enforcement.'"

## III. Implementation of 2011 Performance-Based National Detention Standards and DHS Prison Rape Elimination Act Standards

ICE operates the largest civil detention system in the Nation, and detention remains an important and necessary part of immigration enforcement. In FY 2017, ICE maintained an ADP of 38,106 detainees and booked more than 320,000 individuals into ICE custody. The average length of stay in ICE custody was 44 days. Fifty percent of the ICE-detained population was removed or released within 16 days, 75 percent was removed or released within 48 days, and 90 percent was removed or released within 109 days. ICE is committed to ensuring that detainees in ICE custody reside in safe, secure, and humane environments and under appropriate conditions of confinement. ICE detention standards and DHS PREA safeguards are among the important mechanisms that ICE utilizes for meeting this commitment.

#### A. PBNDS 2011

#### Overview

On February 27, 2012, ICE issued PBNDS 2011 to address the unique needs of ICE's detainee population. ICE designed the revised standards to improve medical and mental health services, implement stronger protections against sexual assault, increase access to legal services and religious opportunities, improve communication for detainees with limited English proficiency, improve the process for reporting and responding to complaints, and increase recreation and visitation.

#### More specifically, the PBNDS 2011:

- Improves medical and mental health care services by: requiring the expanded availability of mental health care staff; requiring faster response times for sick call requests and evaluations of detainees with identified health needs; and ensuring closer monitoring of detainees with serious medical and mental health conditions.
- Reinforces protections against sexual abuse and assault in facilities by: strengthening
  requirements for screening, staff training, and detainee education; establishing procedures
  to ensure the protection and appropriate housing of victims; establishing protocols for
  conducting prompt and thorough investigations in coordination with criminal law
  enforcement entities; and putting in place requirements for tracking and monitoring data
  relating to sexual abuse and assault incidents.
- Broadens detainee access to communications with family, friends, and legal representatives with extended visitation time and enhanced access to telephones.

- Enhances detainee access to legal resources through increasing availability of staff assistance and enabling detainees to attend legal rights group presentations.
- Enhances procedures for reviewing and responding to detainee grievances by: providing
  for additional levels of review and decreased facility response times; encouraging direct
  detainee communication with ICE regarding grievances or facility responses; and
  specifying measures for addressing any indications of retaliation against detainees who
  have filed grievances.
- Improves communication assistance services for detainees with limited English proficiency or disabilities by mandating more-specific interpretation and translation services.
- Augments religious opportunities by authorizing a greater number of religious practices and implementing a process for recruiting external religious service providers.

PBNDS 2011 also introduced the concept of "optimal" compliance through the development of 18 optimal provisions across nine detention standards. Optimal provisions are adopted through contract negotiation between ICE and the service provider, and are in addition to the mandatory requirements to which a facility is bound when it adopts PBNDS 2011. Examples include increased recreation and visitation hours, increased access to law libraries, and enhanced programming.

On January 11, 2017, ICE issued revisions to the PBNDS 2011. The 2016 revisions updated the detention standards to incorporate applicable regulations, including the DHS PREA Standards, Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, as amended (Section 504), and updated ICE policy. The updates to the PBNDS 2011 included:

- <u>DHS PREA Standards</u>. The most significant PBNDS 2011 revisions are to PBNDS 2011 Standard 2.11: "Sexual Abuse and Assault Prevention and Intervention." The revised 2.11 standard includes requirements of ICE Directive 11062.2, *Sexual Abuse and Assault Prevention and Intervention (SAAPI)*, and implements all the requirements in the DHS PREA Standards that are applicable to ICE detention facilities and facility personnel. Additionally, these requirements affect numerous aspects of detention facility policies and procedures, requiring revisions to 11 other standards including but not limited to custody classifications, facility security and control, hold rooms, detainee searches, medical care, grievance procedures, and visitation.
- Section 504. ICE detention facilities are required to comply with Section 504, which prohibits discrimination based on disability and requires facilities to provide detainees with disabilities equal access to its programs and activities through the provision of appropriate accommodations, modifications, and services. The PBNDS revisions include a new detention standard, "4.8 Disability Identification, Assessment, and Accommodation," which establishes processes to ensure compliance by detention facilities with the requirements of Section 504.

- <u>Use of Special Management Units</u>. Standard 2.12 "Special Management Units" was revised to incorporate requirements from ICE Directive 11065.1, *Review of the Use of Segregation for ICE Detainees*, including the requirement that the facility notify the appropriate ICE field office of detainees held in special management units (SMU) for 14 days, and as soon as possible but no later than 72 hours for detainees who have a mental illness or a serious medical illness or serious physical disability. Additional changes were made to Standard 2.12 and to Standard 3.1 Disciplinary System to incorporate a number of the recommendations related to the care of detainees with mental illness and the length of disciplinary sanctions made by DOJ in its "Report and Recommendations Concerning the Use of Restrictive Housing," pursuant to a presidential memorandum directing all agencies using restrictive housing to review the DOJ report and implement corresponding changes. 81 Fed. Reg. 11995 (March 7, 2016).
- <u>Suicide Prevention and Intervention</u>. Standard 4.6 "Significant Self-harm and Suicide Prevention and Intervention" was revised to incorporate best practices to reduce the frequency of suicide attempts in ICE detention facilities and to ensure the appropriate placement and supervision of detainees on suicide precautions, including requirements that facilities establish a multidisciplinary suicide prevention committee and that staff only house suicidal detainees in the SMU as a last resort.
- Incorporation of requirements from other ICE and ERO policies. These include:
  - o ICE Policy No. 11067.1: *Identification of Detainees with Serious Mental Disorders or Conditions* (May 7, 2014) (requiring facilities to notify ICE field offices of detainees with specified serious mental disorders) this notification requirement has been expanded in Standard 4.3 Medical Care to include detainees with specified serious physical illnesses;
  - o ERO Memorandum, *Protocol on Reporting and Tracking of Assaults* (June 8, 2006) (requiring the reporting of sexual and physical assaults);
  - ERO Memorandum, *Identification and Monitoring of Pregnant Detainees* (August 2016) (requiring the reporting of detainees determined to be pregnant)<sup>4</sup>;
  - ERO Bulletin 14-ERO0001, Accommodation of Kosher Meals (April 2014) (explaining facility and ICE obligations to accommodate detainees' religious dietary requirements); and
  - ERO broadcast, Use of Force at ICE Detention Facilities (October 19, 2016)
     (clarifying the types of staff uses of force that detention facilities must report to ICE field offices).

#### **PBNDS 2011 Implementation**

The application of new detention standards at any given detention facility requires negotiation with the contractor or locality operating the facility, and execution of a separate contract modification incorporating the standards into the facility's agreement with ICE. The initial rollout of PBNDS required extensive discussions with detention facility operators regarding the

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<sup>&</sup>lt;sup>4</sup> This memorandum has been replaced by a new ICE directive of the same name issued in December 2017. The new directive is consistent with the PBNDS 2011 revisions.

new provisions prior to the contract modifications being finalized. Accordingly, ICE focused its initial efforts on dedicated facilities, which house the greatest numbers of detainees.

As of the end of FY 2017, ICE implemented PBNDS 2011 at all ICE-dedicated adult detention facilities, which consist of five government-owned service processing centers (SPC), seven privately operated contract detention facilities (CDF), and 12 dedicated intergovernmental service agreement facilities (IGSA). Seven nondedicated IGSA facilities also have adopted PBNDS 2011.<sup>5</sup> ICE has implemented PBNDS 2011 at 31 facilities, housing nearly 60 percent of ICE's ADP in FY 2017.<sup>6</sup>

ICE continues to pursue implementation of these standards at any new dedicated detention facility, meaning any facility used for exclusively ICE or federal detainees. ICE does not anticipate deploying PBNDS 2011 to smaller nondedicated detention facilities; the PBNDS 2011 has extensive requirements related to all aspects of detention operations that are not appropriate to require for facilities managing mixed populations including state or local inmate populations.

#### B. DHS PREA Standards

#### Overview

On March 7, 2014, DHS promulgated a regulation under PREA (P.L. 108-79), to prevent, detect, and respond to sexual abuse and assault in detention facilities, *Standards to Prevent, Detect, and Respond to Sexual Abuse and Assault in Confinement Facilities* (DHS PREA Standards). The DHS PREA Standards followed the President's May 17, 2012, memorandum, "Implementing the Prison Rape Elimination Act," which directed all federal agencies with confinement facilities to work with the Attorney General to create rules or procedures setting standards to prevent, detect, and respond to sexual abuse in confinement facilities. The DHS PREA Standards also followed the Violence Against Women Reauthorization Act of 2013, which directed DHS to publish a final rule adopting national standards for the detection, prevention, reduction, and punishment of rape and sexual assault in facilities that maintain custody of aliens detained for a violation of U.S. immigrations laws. The DHS PREA Standards require extensive planning and training for officers and others who work in detention facilities, and establish standards for audits and compliance reviews. The DHS PREA Standards include two sets of standards tailored to the types of confinement facilities used by ICE and U.S. Customs and Border Protection (CBP):

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<sup>&</sup>lt;sup>5</sup> ICE discontinued its use of the Rolling Plains Detention Center in the second half of FY 2017. Rolling Plains was an IGSA facility covered under PBNDS 2011; therefore, it is not included in the total number of PBNDS 2011 facilities, but its ADP is included in the total PBNDS 2011 ADP. Additionally, ICE signed a contract modification with the Johnson County Jail in January 2017, which included the adoption of PBNDS 2011.

<sup>&</sup>lt;sup>6</sup> The first set of detention standards, known as NDS, was issued in 2000 and most frequently is applicable at county or city jails used by ICE pursuant to an IGSA or USMS IGA. In FY 2017, NDS covered 24 percent of the ICE ADP. ICE's 2008 PBNDS (PBNDS 2008) subsequently revised these standards to delineate more clearly the results or outcomes to be achieved, and to improve safety, security, and conditions of confinement for detainees. In FY 2017, PBNDS 2008 covered 11 percent of the ICE ADP. ICE Family Residential Standards (FRS) were developed in 2007 to bolster best practices in family detention and are applicable to ICE's three family residential facilities, as well as to one adult detention facility that exclusively houses female detainees. In FY 2017, FRS covered 5 percent of the ICE ADP.

- <u>Immigration detention facilities (Subpart A)</u>: facilities overseen by ICE and used for longer term detention of individuals in immigration proceedings or awaiting removal from the United States; and
- <u>Holding facilities (Subpart B)</u>: facilities used by ICE and CBP for temporary administrative detention of individuals pending release from custody or transfer to a court, jail, prison, other agency, or other unit of the facility or agency.

The DHS PREA Standards cover prevention and responsive planning, hiring procedures, the training and education of both employees and detained individuals, assessment for risk of sexual victimization and abusiveness, reporting requirements, the agency's official response following an allegation of sexual abuse or assault, procedures for both criminal and administrative investigations, the provision of medical and mental health care, and audits for compliance procedures, among other areas.

#### The DHS PREA Standards include requirements related to:

- Development of a zero-tolerance policy
- Designation of an ICE prevention of sexual assault (PSA) coordinator
- Training of security staff and all employees who may have contact with detainees in proper procedures
- Specialized training for agency and facility investigators and for medical or mental health practitioners in detention facilities
- Consideration of the effect of design or modification of facilities on the ability to protect detainees from sexual abuse
- Development of policies and procedures to ensure that detainees have multiple ways to report sexual abuse, retaliation for reporting sexual abuse, or staff neglect or violations of responsibilities that may have contributed to such incidents
- Development of investigation and evidence protocols to ensure that each allegation of sexual abuse or sexual assault is investigated or referred to an appropriate investigative authority
- Assurance of effective disciplinary sanctions for staff misconduct, neglect, or violations
- Detainee access to medical and mental health assessments, counseling, and support
- Establishment of effective data collection and review procedures
- Requirements for an audit every 3 years of each immigration detention facility that has adopted the DHS PREA Standards, and of every holding facility that houses detainees overnight

#### **Implementation of Sexual Abuse and Assault Safeguards**

Prior to the issuance of the DHS PREA Standards, ICE had developed strong safeguards against sexual abuse or assault of its detainees in both agency policies and the ICE detention standards.

ICE built on the foundation established by these policies as it proceeded with its implementation of the DHS PREA requirements.

Both PBNDS 2008 and PBNDS 2011 contain sexual abuse and assault prevention and intervention standards that outline responsibilities for facility detention staff. These standards include requirements for screening, training, timely reporting and notification, protection of victims, provision of medical and mental health care, and the investigation and tracking of incidents. In May 2012, ICE sent a letter to all detention facilities with an ADP of greater than 10 detainees and with which ICE had an IGSA or a contract, requesting that they implement PBNDS 2011 Standard 2.11 "Sexual Abuse and Assault Prevention and Intervention." As a result, 57 detention facilities not otherwise covered by PBNDS 2011 agreed to sign contract modifications adopting Standard 2.11.

In May 2012, ICE issued the agencywide Directive 11062.1, *Sexual Abuse and Assault Prevention and Intervention* (SAAPI), which established a zero-tolerance policy for sexual abuse and assault of all individuals in ICE custody, and outlined duties of agency employees for timely reporting, coordinating response and investigation, and effective monitoring of all incidents of sexual abuse or assault. ICE revised and reissued the ICE SAAPI Directive in May 2014 to incorporate the additional agency requirements established under the DHS PREA Standards. SAAPI requires ICE to ensure thorough responses to and investigations of all allegations, even when the allegation occurred at a detention facility not covered by the DHS PREA Standards.

In September 2014, ICE also promulgated a new ERO directive, *Operations of ERO Holding Facilities*, which incorporates DHS PREA Subpart B requirements specifically applicable to ERO hold rooms and staging facilities. ICE holding facilities exclusively are owned and operated by ICE and are used for the short-term detention of individuals, typically 24 or fewer hours. This ERO policy complements SAAPI by outlining requirements for screening for risk, conducting appropriate searches, and ensuring an immediate response to allegations.

The DHS PREA Standards require the appointment of an agencywide PSA coordinator to lead in the development, implementation, and oversight of agency efforts to comply with the DHS PREA Standards. SAAPI further requires the designation of specially trained coordinators at each ICE field office as well as personnel from relevant ICE Headquarters divisions to collaborate in compliance with and implementation of the standards. The ICE agency PSA coordinator provides regular guidance and technical assistance to the field and works closely with the designated PSA coordinators for ERO and the ICE Office of Professional Responsibility (OPR).

In May 2015, ICE developed and deployed a new interactive database to track all allegations of sexual abuse and assault and to record information about responsive actions and investigative results. OPR and ERO collaborate daily to review ICE's response to every new allegation of sexual abuse and assault. As required by SAAPI, the ICE PSA coordinator submits quarterly reports to the ICE Detention Monitoring Council (DMC), along with monthly reports to a subcommittee of the DMC. The DMC is an ICE intra-agency council that ensures that senior leadership from all ICE programs with detention responsibility jointly examines serious issues, incidents, findings, and allegations related to conditions of detention.

#### **PREA Implementation**

The DHS PREA Standards require that all new, renewed, or substantively modified detention facility contracts incorporate the standards. By the end of FY 2017, the DHS PREA Standards were binding contractually at 38 detention facilities. These facilities house 67 percent of FY 2017 ICE ADP, and 85 percent of the ICE ADP when excluding detainees held in USMS-contracted facilities (which are covered by the DOJ PREA regulation). Further, in the same period, SAAPI standards contained in either the DHS PREA Standards or PBNDS were binding contractually at facilities housing approximately 83 percent of the ICE ADP, covering 97 percent of ICE's ADP when excluding USMS-contracted facilities. Pursuant to a commitment made in the preamble to the DHS PREA Standards, ICE successfully implemented the DHS PREA Standards at all 28 dedicated ICE facilities within 18 months of the regulation's effective date of May 6, 2014. ICE also has implemented the DHS PREA Standards at 11 nondedicated facilities.

#### **PREA Audits**

Immigration detention facilities covered by the DHS PREA Standards must be audited within 3 years of adopting the standards and at least once every 3 years thereafter. Certain ICE holding facilities also must be audited by July 6, 2018. Holding facilities deemed by this initial audit to be "low risk" subsequently must be audited at least once every 5 years; holding facilities deemed not to be "low risk" during the initial audit must be audited at least once every 3 years.

To facilitate DHS PREA audits of ICE facilities, OPR, in coordination with other agency programs, solicited and secured a contract vendor to perform the audits. To promote a consistent and unified approach to conducting the audits required under the DHS PREA Standards, ICE and CBP partnered to award a joint audit contract, although ICE and CBP manage implementation of their respective DHS PREA audits independently. ICE OPR is responsible for managing the DHS PREA contract and the ICE PREA audit program.

DHS PREA audits of ICE immigration detention and holding facilities began in February 2017, and ICE OPR has established an aggressive audit schedule to facilitate the completion of initial audits of all applicable immigration detention and holding facilities within the regulatory deadline.

#### IV. Cost of PBNDS 2011 and PREA Implementation

#### A. Cost of PBNDS 2011 Implementation

When issued, the mandatory provisions of PBNDS 2011 were implemented at no cost for all but one of the 20 ICE-dedicated adult detention facilities. Many service providers submitted requests for both per diem increases and one-time upfront funds; however, these expenses are not tied directly to the implementation of PBNDS 2011 and the additional cost to the Federal Government was accepted only after close scrutiny.

A much smaller number of nondedicated detention facilities has adopted PBNDS 2011 at no additional cost to ICE, although in several cases, the adoption of the new detention standards corresponded with ICE agreements to increase per diem payments for other reasons, typically to reimburse localities for their increased labor or other operating costs. This means that, although some facility costs were increased, they were not related directly to the standards. Separately, some upgrades at nondedicated facilities also included the hiring of additional medical staff, although the request for increased medical staffing may not have been directly tied to specific PBNDS 2011 requirements, but to a need for more medical staff generally. When contracts are revised, a number of areas are reviewed to ensure that they represent optimal performance.

However, to date, a very limited number of nondedicated facilities have been asked to convert to PBNDS 2011. The nondedicated facilities that operate under PBNDS 2011 are primarily new facilities or those with a larger ICE population and a historic or operational understanding of ICE's earlier standards. ICE believes that pursing adoption of PBNDS 2011 at a majority of existing NDS facilities would be cost-prohibitive and have a negative impact on operations through the extensive negotiations required and the likelihood of losing facilities that would not comply with the standards or where an agreement on cost could not be reached. Informally, some facilities approached by ICE to consider housing ICE detainees have refused to accept ICE detainees on the basis of ICE's standards and inspections. Additionally, a few smaller facilities that adopted PBNDS 2011 have had difficulty meeting the mandates of the stricter standards. ICE believes that a full rollout of PBNDS 2011 to all nondedicated facilities would lead to many facilities refusing to take ICE detainees, drastically hindering ICE operations.

ICE does not have the ability to predict accurately the cost of PBNDS 2011 expansion to all nondedicated facilities, given the very limited historical evidence. Additionally, each facility has very different staffing and physical infrastructure leading to very site-specific requirements and costs.

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<sup>&</sup>lt;sup>7</sup> Implementation of PBNDS 2011 at the Eloy Federal Contract Facility required additional annual expenditures of approximately \$44,000 and a one-time cost of approximately \$122,000 (for the cost of one additional guard and the physical expansion of the recreation space, respectively). These additional costs arose from the requirement to provide 1 hour of recreation daily to detainees in administrative segregation; PBNDS 2008 required 1 hour of recreation for 5 days each week.

#### B. Cost of PREA Implementation

All 38 of the facilities that implemented the DHS PREA Standards by the end of FY 2017 did so without requesting any increases in per diem or one-time payments. ICE estimates that further adoption of the DHS PREA Standards at additional facilities also will result in no additional cost to the government.

Although not requested by detention facilities as a condition of adopting the DHS PREA Standards, in FY 2015, ICE agreed to fund the hiring of 14 additional detention facility staff to assist in compliance with the standards. DHS PREA § 115.11(d) states, "Each facility shall employ or designate a Prevention of Sexual Assault Compliance Manager (PSA Compliance Manager) who shall serve as the facility point of contact for the agency PSA Coordinator and who has sufficient time and authority to oversee facility efforts to comply with facility sexual abuse prevention and intervention policies and procedures." Additionally, the DHS PREA Standards contain detailed requirements related to detention facility administrative investigations of sexual assault allegations by specially trained investigators, and facilities may require additional staff to review and investigate allegations of sexual abuse or assault appropriately. Although the facility PSA compliance manager or investigator positions can be collateral duties, having a full-time staff member is helpful in ensuring compliance with the standards. Accordingly, ICE offered to pay for one or two additional full-time positions at certain detention facilities. The anticipated total cost of these additional positions was approximately \$325,000 in one-time costs and \$900,000 annually thereafter.

As noted, ICE and CBP procured a contract vendor to perform the audits required by the DHS PREA Standards. ICE initiated DHS PREA audits of ICE immigration detention and holding facilities during the second quarter of FY 2017. Twenty-seven audits were completed by November 14, 2017, and ICE anticipates approximately 25 audits will be completed during FY 2018. Because of the vendor declining to pursue a second option year, OPR recompeted the contract and made an award to a new vendor with audits to commence in FY 2018. Estimated contract-related costs for FY 2018 audits have been adjusted on the basis of experience with the initial year of audits and have been revised and increased in the resolicitation.

#### V. Appendices

Appendix A: Facilities under PBNDS 2011, as of end of Fiscal Year (FY) 2017

Facility Name	State	Facility Type
ADELANTO ICE PROCESSING CENTER	CA	IGSA
ALLEN PARISH PUBLIC SAFETY COMPLEX	LA	IGSA
BROWARD TRANSITIONAL CENTER	FL	CDF
BUFFALO (BATAVIA) SERVICE PROCESSING CENTER	NY	SPC
CIBOLA COUNTY CORRECTIONAL CENTER	NM	IGSA
DENVER CONTRACT DETENTION FACILITY	CO	CDF
EL PASO SERVICE PROCESSING CENTER	TX	SPC
ELIZABETH CONTRACT DETENTION FACILITY	NJ	CDF
ELOY FEDERAL CONTRACT FACILITY	AZ	IGSA
ESSEX COUNTY CORRECTIONAL FACILITY	NJ	IGSA
FLORENCE SERVICE PROCESSING CENTER	AZ	SPC
FOLKSTON ICE PROCESSING CENTER (D. RAY JAMES)	GA	IGSA
HOUSTON CONTRACT DETENTION FACILITY	TX	CDF
HOWARD COUNTY DETENTION CENTER	MD	IGSA
IMMIGRATION CENTERS OF AMERICA FARMVILLE	VA	IGSA
IMPERIAL REGIONAL DETENTION FACILITY	CA	IGSA
JENA/LASALLE DETENTION FACILITY	LA	IGSA
JOE CORLEY DETENTION FACILITY	TX	IGSA
JOHNSON COUNTY CORRECTIONS CENTER	TX	IGSA
KROME NORTH SERVICE PROCESSING CENTER	FL	SPC
MESA VERDE DETENTION FACILITY	CA	IGSA
NORTHEAST OHIO CORRECTIONAL CTR (YOUNGSTOWN CDF)	ОН	CDF
	WA	CDF
	CA	CDF
,	NM	IGSA
	LA	IGSA
PORT ISABEL	TX	SPC
	TX	IGSA
	IL	IGSA
	TX	CDF
STEWART DETENTION CENTER	GA	IGSA

Source: FY 2017 data: ICE Integrated Decision Support (IIDS) as of 10/02/2017; Enforcement Integrated Database (EID) data through 09/30/2017

Appendix B: Facilities under PBNDS 2008, as of end of FY 2017

Facility Name	State	Facility Type
BRISTOL COUNTY DETENTION CENTER	MA	IGSA
CCA CENTRAL ARIZONA DETENTION CENTER	ΑZ	USMS IGA
CCA FLORENCE CORRECTIONAL CENTER	AZ	USMS IGA
DOUGLAS COUNTY DEPARTMENT OF CORRECTIONS	NE	IGSA
HUDSON COUNTY CORRECTIONAL CENTER	NJ	IGSA
JAMES A. MUSICK FACILITY	CA	IGSA
MONROE COUNTY DETENTION CENTER	FL	IGSA
ORANGE COUNTY INTAKE RELEASE FACILITY	CA	IGSA
PIKE COUNTY CORRECTIONAL FACILITY	PA	IGSA
RIO GRANDE DETENTION CENTER	TX	USMS IGA
SAINT CLAIR COUNTY JAIL	MI	IGSA
STRAFFORD COUNTY CORRECTIONS	NH	IGSA
THEO LACY FACILITY	CA	IGSA
WESTERN TENNESSEE DETENTION FACILITY	TN	USMS IGA
YORK COUNTY PRISON	PA	IGSA
BRISTOL COUNTY DETENTION CENTER	MA	IGSA

Appendix C: Facilities under NDS 2000, as of end of FY 2017

Facility Name	State	Facility Type
ALBANY COUNTY JAIL	NY	USMS IGA
ALEXANDRIA CITY JAIL	VA	USMS IGA
ALLEGANY COUNTY JAIL	NY	IGSA
ANCHORAGE CORRECTIONAL COMPLEX	AK	USMS IGA
ATLANTA CITY DETENTION CENTER	GA	USMS IGA
BAKER COUNTY SHERIFF'S OFFICE	FL	IGSA
BALDWIN COUNTY CORRECTIONAL CENTER	AL	IGSA
BEAVER COUNTY JAIL	PA	USMS IGA
BEDFORD MUNICIPAL DETENTION CENTER	TX	IGSA
BENTON COUNTY DETENTION CENTER	AR	USMS IGA
BERGEN COUNTY JAIL	NJ	USMS IGA
BOONE COUNTY JAIL	KY	USMS IGA
BREMER COUNTY JAIL	IA	USMS IGA
BROOKS COUNTY DETENTION CENTER	TX	USMS IGA
BURNET COUNTY JAIL	TX	IGSA
BUTLER COUNTY JAIL	ОН	IGSA
BUTLER COUNTY JAIL	KS	USMS IGA
CABARRUS COUNTY JAIL	NC	IGSA
CALDWELL COUNTY DETENTION CENTER	MO	IGSA
CALHOUN COUNTY CORRECTIONAL CENTER	MI	IGSA
CAMBRIA COUNTY JAIL	PA	USMS IGA
CARVER COUNTY JAIL	MN	IGSA
CASCADE COUNTY JAIL (MONTANA)	MT	USMS IGA
CASS COUNTY JAIL	NE	USMS IGA
CENTRAL TEXAS DETENTION FACILITY	TX	USMS IGA
CHARLESTON COUNTY DETENTION CENTER	SC	USMS IGA
CHASE COUNTY DETENTION FACILITY	KS	IGSA
CHAUTAUQUA COUNTY JAIL	NY	IGSA
CHIPPEWA COUNTY SSM	MI	IGSA
CHRISTIAN COUNTY JAIL	MO	IGSA
CLINTON COUNTY CORRECTIONAL FACILITY	PA	USMS IGA
CLINTON COUNTY JAIL	NY	USMS IGA
COBB COUNTY JAIL	GA	IGSA
COCONINO COUNTY DETENTION FACILITY	AZ	USMS IGA
COLLIER COUNTY NAPLES JAIL CENTER	FL	IGSA
CONTRA COSTA COUNTY JAIL WEST	CA	USMS IGA
CUMBERLAND COUNTY JAIL	ME	USMS IGA
DAKOTA COUNTY JAIL	NE	USMS IGA

Facility Name	State	Facility Type
DALE G. HAILE DETENTION CENTER	ID	IGSA
DAVIDSON COUNTY SHERIFF	TN	IGSA
DEARBORN POLICE DEPARTMENT	MI	IGSA
DEKALB COUNTY DETENTION CENTER	AL	USMS IGA
DELAWARE CO JAIL (GEORGE W. HILL)	PA	USMS IGA
DODGE COUNTY JAIL	WI	USMS IGA
EAST HIDALGO DETENTION CENTER	TX	USMS IGA
EL PASO COUNTY CRIMINAL JUSTICE CENTER	CO	IGSA
ELGIN POLICE DEPARTMENT	IL	IGSA
ELMORE COUNTY JAIL	ID	USMS IGA
ERIE COUNTY JAIL	PA	USMS IGA
ETOWAH COUNTY JAIL (ALABAMA)	AL	USMS IGA
EULESS CITY JAIL	TX	IGSA
FAIRFAX COUNTY ADULT DETENTION CENTER	VA	IGSA
FAIRFAX COUNTY JAIL	VA	USMS IGA
FAYETTE COUNTY DETENTION CENTER	KY	USMS IGA
FORSYTH COUNTY JAIL	NC	USMS IGA
FRANKLIN COUNTY HOUSE OF CORRECTION	MA	USMS IGA
FREDERICK COUNTY DETENTION CENTER	MD	IGSA
FREEBORN COUNTY ADULT DETENTION CENTER	MN	IGSA
GARVIN COUNTY DETENTION CENTER	OK	IGSA
GASTON COUNTY JAIL	NC	IGSA
GEAUGA COUNTY JAIL	ОН	USMS IGA
GLADES COUNTY DETENTION CENTER	FL	IGSA
GLENDALE POLICE DEPARTMENT	CA	IGSA
GRAND FORKS COUNTY CORRECTIONAL FACILITY	ND	IGSA
GRAYSON COUNTY JAIL	KY	USMS IGA
HALL COUNTY DEPARTMENT OF CORRECTIONS	NE	IGSA
HALL COUNTY JAIL	GA	USMS IGA
HARDIN COUNTY JAIL	IA	IGSA
HENDERSON DETENTION CENTER	NV	USMS IGA
JACK HARWELL DETENTION CENTER	TX	USMS IGA
JEFFERSON COUNTY JAIL	ID	IGSA
JOSEPHINE COUNTY JAIL	OR	USMS IGA
KANKAKEE COUNTY JAIL (JEROME COMBS DET CTR)	IL	USMS IGA
KARNES COUNTY CORRECTIONAL CENTER	TX	USMS IGA
KENOSHA COUNTY DETENTION CENTER	WI	USMS IGA
KENT COUNTY JAIL	MI	IGSA
LA PAZ COUNTY ADULT DETENTION FACILITY	AZ	USMS IGA
LA PLATA COUNTY JAIL	CO	USMS IGA
LA SALLE COUNTY REGIONAL DETENTION CENTER	TX	USMS IGA

Facility Name	State	Facility Type
LAREDO PROCESSING CENTER	TX	USMS IGA
LEXINGTON COUNTY JAIL	SC	USMS IGA
LINCOLN COUNTY DETENTION CENTER	MO	IGSA
LINN COUNTY JAIL	IA	USMS IGA
LONOKE POLICE DEPARTMENT	AR	IGSA
LUBBOCK COUNTY DETENTION CENTER	TX	USMS IGA
MARION COUNTY JAIL	IN	USMS IGA
MARSHALL COUNTY JAIL	IA	USMS IGA
MCHENRY COUNTY CORRECTIONAL FACILITY	IL	USMS IGA
MECKLENBURG COUNTY DETENTION CENTER	NC	USMS IGA
NORTH		
MILLER COUNTY JAIL	AR	USMS IGA
MINICASSIA DETENTION CENTER	ID	IGSA
MOFFAT COUNTY JAIL	CO	IGSA
MONROE COUNTY DETENTION-DORM	MI	IGSA
MONTGOMERY CITY JAIL	AL	IGSA
MONTGOMERY COUNTY JAIL	MO	IGSA
MORGAN COUNTY ADULT DETENTION CENTER	MO	IGSA
MORROW COUNTY CORRECTIONAL FACILITY	ОН	IGSA
NATRONA COUNTY JAIL	WY	USMS IGA
NAVAJO COUNTY SHERIFF	AZ	IGSA
NEW HANOVER COUNTY JAIL	NC	IGSA
NOBLES COUNTY JAIL	MN	IGSA
NORFOLK COUNTY JAIL	MA	USMS IGA
NORTHERN OREGON CORRECTIONAL FACILITY	OR	IGSA
NORTHERN REGIONAL JAIL	WV	USMS IGA
NORTHWEST STATE CORRECTIONAL CENTER	VT	USMS IGA
OLDHAM COUNTY JAIL	KY	IGSA
ORANGE COUNTY INTAKE RELEASE FACILITY	CA	IGSA
ORANGE COUNTY JAIL	NY	IGSA
ORANGE COUNTY JAIL	FL	USMS IGA
OTERO COUNTY PRISON FACILITY	NM	USMS IGA
PENNINGTON COUNTY JAIL (SOUTH DAKOTA)	SD	USMS IGA
PHELPS COUNTY JAIL	NE	USMS IGA
PINELLAS COUNTY JAIL	FL	USMS IGA
PLATTE COUNTY DETENTION CENTER	MO	IGSA
PLATTE COUNTY JAIL	WY	USMS IGA
PLYMOUTH COUNTY CORRECTIONAL FACILITY	MA	IGSA
POLK COUNTY ADULT DETENTION FACILITY	TX	IGSA
POLK COUNTY JAIL	IA	USMS IGA
POTTAWATTAMIE COUNTY JAIL	IA	USMS IGA

Facility Name	State	Facility Type
PRINCE WILLIAM COUNTY CORRECTIONAL FACILITY	VA	USMS IGA
RAMSEY COUNTY ADULT DETENTION CENTER	MN	USMS IGA
RANDALL COUNTY JAIL	TX	USMS IGA
RIO COSUMNES CORR. CENTER	CA	IGSA
RIO GRANDE COUNTY JAIL	CO	IGSA
ROANOKE CITY JAIL	VA	IGSA
ROCK ISLAND COUNTY CORRECTIONAL CENTER	IL	USMS IGA
ROCKINGHAM COUNTY JAIL	VA	USMS IGA
SAINT TAMMANY PARISH JAIL	LA	IGSA
SAN LUIS REGIONAL DETENTION CENTER	AZ	USMS IGA
SANGAMON COUNTY JAIL	IL	USMS IGA
SANTA CRUZ COUNTY JAIL	AZ	USMS IGA
SEBASTIAN COUNTY DETENTION CENTER	AR	USMS IGA
SENECA COUNTY JAIL	ОН	IGSA
SHAWNEE COUNTY DEPARTMENT OF CORRECTIONS	KS	IGSA
SHERBURNE COUNTY JAIL	MN	USMS IGA
SOUTH CENTRAL REGIONAL JAIL	WV	USMS IGA
SUFFOLK COUNTY HOUSE OF CORRECTIONS	MA	IGSA
TAYLOR COUNTY ADULT DETENTION FACILITY	TX	IGSA
TELLER COUNTY JAIL	СО	IGSA
TITUS COUNTY JAIL	TX	USMS IGA
TOM GREEN COUNTY JAIL	TX	USMS IGA
TORRANCE COUNTY DETENTION FACILITY	NM	USMS IGA
TULSA COUNTY JAIL (DAVID L. MOSS JUSTICE CTR)	OK	IGSA
VAL VERDE CORRECTIONAL FACILITY	TX	USMS IGA
VIRGINIA PENINSULA REGIONAL JAIL	VA	USMS IGA
WAKE COUNTY SHERIFF DEPARTMENT	NC	IGSA
WAKULLA COUNTY JAIL	FL	IGSA
WASHINGTON COUNTY DETENTION CENTER	AR	USMS IGA
WASHINGTON COUNTY JAIL (PURGATORY	UT	USMS IGA
CORRECTIONAL FAC		
WASHOE COUNTY JAIL	NV	USMS IGA
WAYNE COUNTY JAIL	NY	USMS IGA
WEBB COUNTY DETENTION CENTER (CCA)	TX	USMS IGA
WEST TEXAS DETENTION FACILITY	TX	USMS IGA
WHITFIELD COUNTY JAIL	GA	IGSA
WILLACY CO REGIONAL DETENTION FACILITY	TX	USMS IGA
WORCESTER COUNTY JAIL	MD	IGSA
YAKIMA COUNTY DEPARTMENT OF CORRECTIONS	WA	USMS IGA
YANKTON COUNTY JAIL	SD	USMS IGA
YAVAPAI COUNTY DETENTION CENTER	AZ	IGSA

Facility Name	State	Facility Type
YORK COUNTY DETENTION CENTER	SC	USMS IGA
YUBA COUNTY JAIL	CA	IGSA

Note: These include authorized facilities with the last inspection standard "NDS" and exclude the Department of Health and Human Services Office of Refugee Resettlement and the Mexican Interior Repatriation Program as well as Family and the Federal Bureau of Prisons.

Appendix D: Facilities under Family Residential Standards, as of end of FY 2017

Facility Name	State	Facility Type
BERKS COUNTY FAMILY SHELTER	PA	FAMILY
HUTTO CCA	TX	FAMILY
KARNES COUNTY RESIDENTIAL CENTER	TX	FAMILY
SOUTH TEXAS FAMILY RESIDENTIAL CENTER	TX	FAMILY

Appendix E: Facilities under DHS PREA Standards, as of end of FY 2017

e Type	ity
	:
ADELANTO ICE PROCESSING CENTER CA IGSA	<b>L</b>
ALLEN PARISH PUBLIC SAFETY COMPLEX LA IGSA	<b>\</b>
BERKS COUNTY FAMILY SHELTER PA IGSA	<b>L</b>
BROWARD TRANSITIONAL CENTER FL CDF	
BUFFALO (BATAVIA) SERVICE PROCESSING CENTER NY SPC	
CIBOLA COUNTY CORRECTIONAL CENTER NM IGSA	<b>\</b>
DENVER CONTRACT DETENTION FACILITY CO CDF	
EL PASO SERVICE PROCESSING CENTER TX SPC	
ELIZABETH CONTRACT DETENTION FACILITY NJ CDF	
ELOY FEDERAL CONTRACT FACILITY AZ IGSA	<b>\</b>
ESSEX COUNTY CORRECTIONAL FACILITY NJ IGSA	<b>\</b>
FLORENCE SERVICE PROCESSING CENTER AZ SPC	
FOLKSTON ICE PROCESSING CENTER (D. RAY JAMES) GA IGSA	<b>L</b>
HOUSTON CONTRACT DETENTION FACILITY TX CDF	
HOWARD COUNTY DETENTION CENTER MD IGSA	
HUTTO CCA TX IGSA	
IMMIGRATION CENTERS OF AMERICA FARMVILLE VA IGSA	
IMPERIAL REGIONAL DETENTION FACILITY CA IGSA	
JAMES A. MUSICK FACILITY CA IGSA	
JENA/LASALLE DETENTION FACILITY LA IGSA	
JOE CORLEY DETENTION FACILITY TX IGSA	
JOHNSON COUNTY CORRECTIONS CENTER TX IGSA	
KARNES COUNTY RESIDENTIAL CENTER TX IGSA	
KROME NORTH SERVICE PROCESSING CENTER FL SPC	
MESA VERDE DETENTION FACILITY CA IGSA	
NORTHEAST OHIO CORRECTIONAL CTR (YOUNGSTOWN OH CDF	
CDF)	
NORTHWEST DETENTION CENTER WA CDF	
OTERO COUNTY PROCESSING CENTER NM IGSA	<b>L</b>
PINE PRAIRIE CORRECTIONAL CENTER LA IGSA	
POLK COUNTY ADULT DETENTION FACILITY TX IGSA	<b>\</b>
PORT ISABEL TX SPC	
PRAIRIELAND DETENTION FACILITY TX IGSA	
PULASKI COUNTY JAIL IL IGSA	
SOUTH TEXAS DETENTION COMPLEX TX CDF	
SOUTH TEXAS FAMILY RESIDENTIAL CENTER TX IGSA	
STEWART DETENTION CENTER GA IGSA	

THEO LACY FACILITY	CA	IGSA
YORK COUNTY PRISON	PA	IGSA

Appendix F: Authorized Detention Management Control Program IGSA Facilities that have not adopted DHS PREA Standards, as of end of FY 2017

Facility Name	State	Facility Type
ABRAXAS ACADEMY DETENTION CENTER	PA	IGSA
ALLEGANY COUNTY JAIL	NY	IGSA
BAKER COUNTY SHERIFF'S OFFICE	FL	IGSA
BALDWIN COUNTY CORRECTIONAL CENTER	AL	IGSA
BEDFORD MUNICIPAL DETENTION CENTER	TX	IGSA
BRISTOL COUNTY DETENTION CENTER	MA	IGSA
BURNET COUNTY JAIL	TX	IGSA
BUTLER COUNTY JAIL	ОН	IGSA
CABARRUS COUNTY JAIL	NC	IGSA
CALDWELL COUNTY DETENTION CENTER	MO	IGSA
CALHOUN COUNTY CORRECTIONAL CENTER	MI	IGSA
CARVER COUNTY JAIL	MN	IGSA
CARVER COUNTY JUVENILE DETENTION CENTER	MN	IGSA
CHASE COUNTY DETENTION FACILITY	KS	IGSA
CHAUTAUQUA COUNTY JAIL	NY	IGSA
CHIPPEWA COUNTY SSM	MI	IGSA
CHRISTIAN COUNTY JAIL	MO	IGSA
COBB COUNTY JAIL	GA	IGSA
COLLIER COUNTY NAPLES JAIL CENTER	FL	IGSA
COMPASS HOUSE SHELTER	NY	IGSA
COWLITZ COUNTY JUVENILE	WA	IGSA
DALE G. HAILE DETENTION CENTER	ID	IGSA
DAVIDSON COUNTY SHERIFF	TN	IGSA
DEARBORN POLICE DEPARTMENT	MI	IGSA
DOUGLAS COUNTY DEPARTMENT OF CORRECTIONS	NE	IGSA
EL PASO COUNTY CRIMINAL JUSTICE CENTER	CO	IGSA
ELGIN POLICE DEPARTMENT	IL	IGSA
EULESS CITY JAIL	TX	IGSA
FAIRFAX COUNTY ADULT DETENTION CENTER	VA	IGSA
FREDERICK COUNTY DETENTION CENTER	MD	IGSA
FREEBORN COUNTY ADULT DETENTION CENTER	MN	IGSA
GARVIN COUNTY DETENTION CENTER	OK	IGSA
GASTON COUNTY JAIL	NC	IGSA
GLADES COUNTY DETENTION CENTER	FL	IGSA
GLENDALE POLICE DEPARTMENT	CA	IGSA
GRAND FORKS COUNTY	ND	IGSA

GRAND FORKS COUNTY CORRECTIONAL FACILITY	ND	IGSA
HALL COUNTY DEPARTMENT OF CORRECTIONS	NE	IGSA
HARDIN COUNTY JAIL	IA	IGSA
HUDSON COUNTY CORRECTIONAL CENTER	NJ	IGSA
JEFFERSON COUNTY JAIL	ID	IGSA
KENT COUNTY JAIL	MI	IGSA
LINCOLN COUNTY DETENTION CENTER	MO	IGSA
LONOKE POLICE DEPARTMENT	AR	IGSA
MAINE YOUTH CENTER - LONG CREEK	ME	IGSA
MINICASSIA DETENTION CENTER	ID	IGSA
MOFFAT COUNTY JAIL	CO	IGSA
MONROE COUNTY DETENTION CENTER	FL	IGSA
MONROE COUNTY DETENTION-DORM	MI	IGSA
MONTGOMERY CITY JAIL	AL	IGSA
MONTGOMERY COUNTY JAIL	MO	IGSA
MORGAN COUNTY ADULT DETENTION CENTER	MO	IGSA
MORROW COUNTY CORRECTIONAL FACILITY	ОН	IGSA
NAVAJO COUNTY SHERIFF	AZ	IGSA
NEW HANOVER COUNTY JAIL	NC	IGSA
NOBLES COUNTY JAIL	MN	IGSA
NORTHERN OREGON CORRECTIONAL FACILITY	OR	IGSA
NORTHERN OREGON JUVENILE DETENTION	OR	IGSA
NORTHERN VIRGINIA JUVENILE DETENTION CENTER	VA	IGSA
OLDHAM COUNTY JAIL	KY	IGSA
ORANGE COUNTY INTAKE RELEASE FACILITY	CA	IGSA
ORANGE COUNTY JAIL	NY	IGSA
PIKE COUNTY CORRECTIONAL FACILITY	PA	IGSA
PLATTE COUNTY DETENTION CENTER	MO	IGSA
PLYMOUTH COUNTY CORRECTIONAL FACILITY	MA	IGSA
RIO COSUMNES CORR. CENTER	CA	IGSA
RIO GRANDE COUNTY JAIL	CO	IGSA
ROANOKE CITY JAIL	VA	IGSA
ROLLING PLAINS DETENTION CENTER	TX	IGSA
SAINT CLAIR COUNTY JAIL	MI	IGSA
SAINT TAMMANY PARISH JAIL	LA	IGSA
SENECA COUNTY JAIL	ОН	IGSA
SHAWNEE COUNTY DEPARTMENT OF CORRECTIONS	KS	IGSA
SHAWNEE COUNTY JUVENILE DETENTION CENTER	KS	IGSA
STRAFFORD COUNTY CORRECTIONS	NH	IGSA
SUFFOLK COUNTY HOUSE OF CORRECTIONS	MA	IGSA
TAYLOR COUNTY ADULT DETENTION FACILITY	TX	IGSA
TELLER COUNTY JAIL	CO	IGSA

TULSA COUNTY JAIL (DAVID L. MOSS JUSTICE CTR)	OK	IGSA
WAKE COUNTY SHERIFF DEPARTMENT	NC	IGSA
WAKULLA COUNTY JAIL	FL	IGSA
WHITFIELD COUNTY JAIL	GA	IGSA
WORCESTER COUNTY JAIL	MD	IGSA
YAVAPAI COUNTY DETENTION CENTER	ΑZ	IGSA
YUBA COUNTY JAIL	CA	IGSA