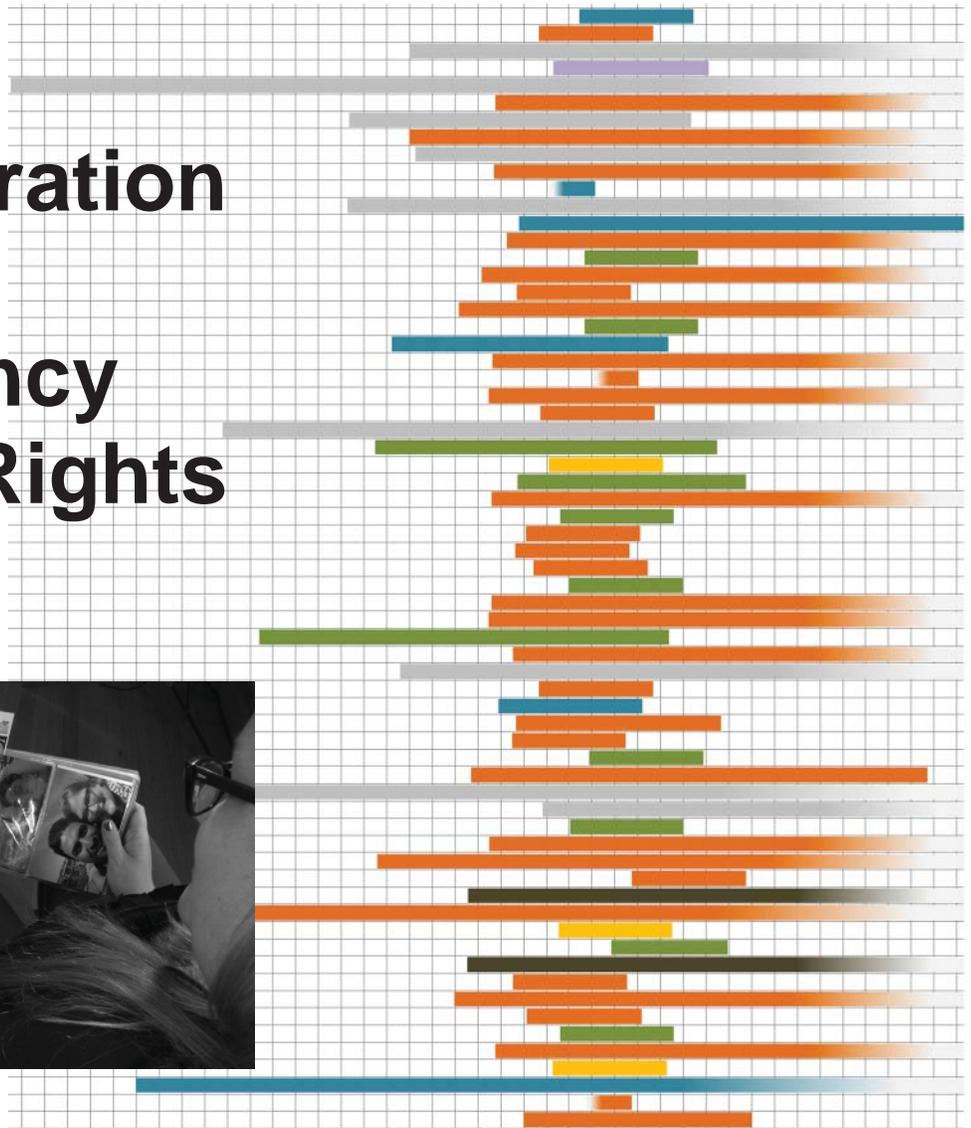


The Immigration Detention Transparency & Human Rights Project



**Freedom of Information Act Litigation
Reveals Systemic Lack of Accountability
in Immigration Detention Contracting**

August 2015 Report

**NATIONAL
IMMIGRANT
JUSTICE CENTER**

A HEARTLAND ALLIANCE PROGRAM

immigrantjustice.org

About the National Immigrant Justice Center

With offices in Chicago, Indiana, and Washington, D.C., Heartland Alliance's National Immigrant Justice Center (NIJC) is a nongovernmental organization dedicated to ensuring human rights protections and access to justice for all immigrants, refugees, and asylum seekers through a unique combination of direct services, policy reform, impact litigation and public education.

Visit immigrantjustice.org

Acknowledgements

The principal authors of this report are NIJC Director of Detention Services Claudia Valenzuela and NIJC Director of Communications Tara Tidwell Cullen, with research and editing contributions from NIJC colleagues Jennifer Chan, Mark Fleming, John Foerester, Catherine Matthews, Mary Meg McCarthy, Royce Bernstein Murray, Kathleen O'Donovan, Katherine Rivera, and Julia Toepfer.

Sincere thanks to *pro bono* attorneys at Dentons US LLP, who represented NIJC through more than three years of Freedom of Information Act litigation.

Additional thanks to Assistant Professor John Eason, Professor Pat Rubio Goldsmith, and their team at the Texas A&M Department of Sociology, Professor David Hernández at Mount Holyoke College, Detention Watch Network, and Grassroots Leadership, whose review of thousands of pages of documents and feedback were critical to this report and to the launch of NIJC's Immigration Detention Transparency and Human Rights Project.

Cover Image: See3, from NIJC's 2013 video *Love Detained*.

© August 2015 Heartland Alliance's National Immigrant Justice Center

The Immigration Detention Transparency & Human Rights Project

August 2015 Report

Table of Contents

I. Executive Summary	3
II. Obama's Unfulfilled Promises of Transparency and Reform	4
III. Understanding the Contracts	5
IV. A System in Disarray: NIJC's Review of 94 Detention Center Contracts	6
V. Transparency is a Human Rights Issue	9
VI. Recommendations	10
VII. Endnotes	11
VIII. Attachment (Raw Data)	13

*Read this report and download contracts and other cited documents at
immigrantjustice.org/publications/TransparencyandHumanRightsAugust2015*

I. Executive Summary

The National Immigrant Justice Center's (NIJC's) three-year Freedom of Information Act (FOIA) litigation has resulted in the most comprehensive public release to date of Department of Homeland Security (DHS) immigration detention center contracts and inspections. The thousands of pages of documents provide an unprecedented look into a failed system that lacks accountability, shields DHS from public scrutiny, and allows local governments and private prison companies to brazenly maximize profits at the expense of basic human rights.

NIJC's pursuit of transparency and accountability began in April 2011 with a FOIA request¹ seeking all U.S. Immigration and Customs Enforcement (ICE) detention facility contracts, as well as inspection reports dating back to 2007. Notwithstanding President Obama's 2009 directive to increase government transparency, it took four years, one federal lawsuit, two depositions of ICE officers deemed experts in immigration detention contracting and inspections, and a federal court order² to obtain documents for more than 100 of the country's largest detention facilities. The average daily population for these facilities represents approximately 92 percent of the 33,400 detention beds ICE maintained on an average day in 2012³ (the most recent year for which NIJC obtained documents). (See Fig. 1)

Links to the ICE contracts are at immigrantjustice.org/TransparencyandHumanRights

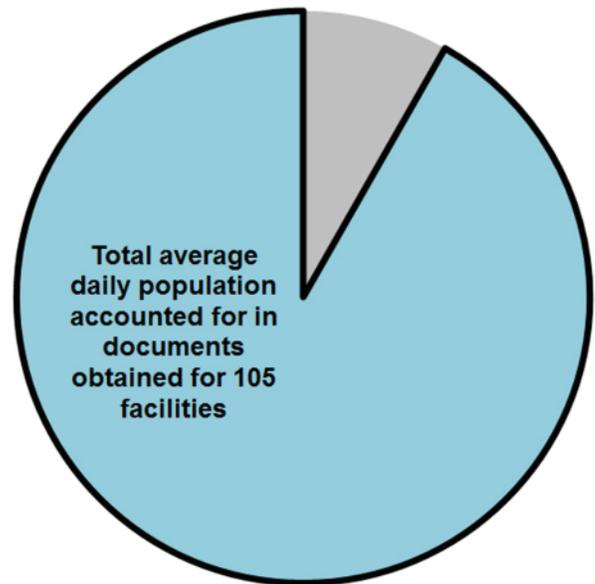
For this first of a series of reports, NIJC has reviewed and posted 90 contracts, four partial contracts, and the deposition testimony of a former ICE contracting officer who describes the agency's contracting processes.⁴ We owe significant gratitude to a team of *pro bono* attorneys from the global law firm Dentons US LLP, who represented NIJC in the litigation and depositions. Several of NIJC's findings reflect those in an October 2014 Government Accountability Office (GAO) report, which highlighted the lack of uniformity in how ICE tracks expenditures within and across facilities and criticized ICE's lack of explanation for why it has allowed many facilities to lag in implementing the most current ICE detention standards.⁵ NIJC will release a second report analyzing hundreds of ICE inspection reports later this year.

NIJC's review of the contracts reveals:

- The immigration detention contracting process is convoluted and obscure, suffering from a significant lack of uniformity in how contracts are created, executed, and maintained.
- There is a lack of consistency and clarity as to which detention standards govern which facilities.
- Forty-five facilities operate with indefinite contracts, mostly under outdated standards.
- Tracking the taxpayer dollars ICE pays to local and private contractors to detain immigrants is daunting, and for some facilities, nearly impossible.

Fig. 1

NIJC's data covers 92% of the 33,400 beds ICE filled in 2012



- The practice of contracting and subcontracting with private entities shields many ICE detention facilities from public (taxpayer) scrutiny.
- At least 12 contracts will expire in the next three years, providing an opportunity for advocates to raise questions about the efficacy of keeping these facilities open and ensure any modifications or extensions contain robust standards.

To address these issues, NIJC calls on ICE to:

- Provide public access to information regarding the detention center contracting process.
- Require that all facilities adhere to the 2011 Performance-Based National Detention Standards (2011 PBNDS), the most-current and robust set of ICE detention standards, without further delay.
- End the practice of entering into indefinite contracts and revisit any existing contracts which do not contain explicit renegotiation dates.
- Refrain from entering into contracts agreeing to minimum bed guarantees.
- Throughout the contracts negotiation process for individual detention facilities, engage with legal service providers, faith groups, and other local and national non-governmental organizations that visit facilities, to address human rights and due process issues they observe.

NIJC calls on Congress to increase government transparency and improve oversight of ICE by passing the following two pieces of legislation:

1. Accountability in Immigration Detention Act, sponsored by Rep. Adam Smith (D-WA)
2. Protecting Taxpayers and Communities from Local Detention Quotas Act, sponsored by Reps. Ted Deutch (D-FL), Bill Foster (D-IL), and Smith

II. Obama's Unfulfilled Promises of Transparency and Reform

On January 21, 2009, President Obama's first full day in office, he announced his intent to set an open tone for the federal government under his administration. In a memorandum⁶ encouraging greater government transparency and accountability, the president directed then-U.S. Attorney General Eric Holder to issue new FOIA guidance to all executive departments and agencies.

About eight months later, the Obama administration announced reforms to the immigration detention system, including ways to reduce detention, standardize contracts, and implement more oversight over facilities using a more "civil" model.⁷ Advocates championed these goals, which also were supported by an expert consultant hired by the Obama administration to conduct an in-depth evaluation of the detention system.⁸

Six years later, the sprawling DHS detention system has only grown farther from those civil detention reform goals. Instead of reducing detention, the administration now incarcerates women and children who flee to the United States seeking protection from persecution.⁹ While NIJC's FOIA did not specifically request family detention center contracts, two of which did not exist in 2011, recent reports have questioned the morality of detaining families and the manner in which family detention center contracts are negotiated.¹⁰ This report does not address family detention, however many of the concerns arising from the detention of families are similar to concerns with the entire immigration detention system, including reports of unreasonably high bonds (particularly for asylum seekers), hunger strikes,

deaths, suicide attempts, and inadequate medical care.¹¹

ICE remains as secretive as ever about its detention contracting and inspection processes.¹² ICE does not proactively share information about contracts and inspections and has done so only when forced via FOIA requests. The little information ICE does release pursuant to FOIA lawsuits is far from transparent. For example, most of the contracts and inspections posted on the agency's FOIA Library website are outdated.¹³ ICE does not publicly share which facilities are open or closed. Moreover, the increased use of private contractors and sub-contractors further obfuscates how billions of taxpayer dollars are distributed and used to negotiate these contracts.¹⁴ Corporations take advantage of their private entity status to invoke redactions regarding funding allocations and avoid direct liability for sub-standard conditions.

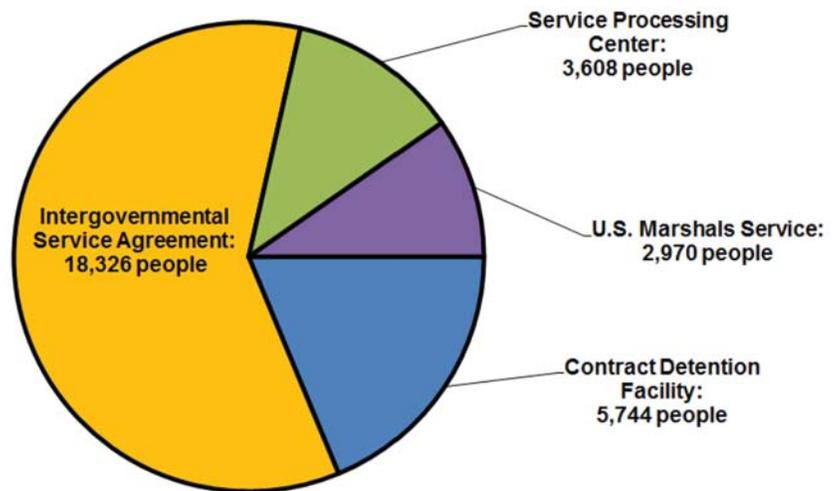
III. Understanding the Contracts

ICE divides its detention facilities into four categories, which dictate the execution and often the terms of each contract (See Fig. 2):

Contract Detention Facilities (CDFs): Facilities owned and operated by private corporations that contract directly with ICE. ICE officials have stated that these facilities, often built just to detain immigrants, are subject to the 2011 PBNDS¹⁵, but of the seven CDF contracts NIJC obtained, only six explicitly mention this set of standards. ICE's contract with Corrections Corporation of America (CCA) for the Houston CDF in Texas states that the facility is subject to the 2000 National Detention Standards (2000 NDS).

Fig. 2

Average daily population by type of facility contract



A myriad of complex federal contracting protocols, statutes, and regulations, most notably the Federal Acquisition Regulation¹⁶, govern CDF contracts. Congress' appropriations process allocates funds to pay the contractors and contract line item numbers (referred to as "CLIN" in the contracts) track facilities' expenses and how money is paid. As a result, deciphering how much taxpayers pay for these facilities, and how these private contractors allocate money to run the detention centers, is nearly impossible for anyone who is not an expert in government appropriations and contracting.

Service Processing Centers (SPCs): Six facilities directly owned and operated by ICE, though ICE hires contractors to handle many services, including administration of some facilities. NIJC received one SPC contract, between ICE and the Alaska Native Corporation Ahtna Technical Services, Inc., to administer Port Isabel Service Processing Center in Texas.

Intergovernmental Service Agreements (IGSAs): Facilities owned and operated by local governmental entities, most often county or city governments. Many local governments in turn subcontract with private corporations to administer and provide services. While private corporations have garnered the most attention for warehousing immigrants for profit, NIJC has found that even local governments seek to maximize profits from the detention space they rent to ICE. At some facilities, such profit motives have resulted in cost-cutting on a range of basic needs for immigrants, such as medical

care¹⁷, food, and hygiene products. Other county governments have hired consultants to navigate the obscure process of negotiating higher per diem rates.¹⁸ Some IGSA facilities hold individuals in ICE custody exclusively and are referred to as “dedicated IGSA” or “DIGSAs.” NIJC did not discern any particular differences between IGSA and DIGSA facility contracts. In fact, the contracts themselves do not denote whether the facility is a DIGSA.

U.S. Marshals Service (USMS) Intergovernmental Agreements (IGAs): Facilities under contract with the Department of Justice’s U.S. Marshals Service. Typically, these contracts pre-date the 2003 creation of DHS, and continue to be renewed via the U.S. Marshals, though subsequent amendments (also referred to as “modifications”) list ICE as a party to the contracts. Initially, in NIJC’s litigation, ICE claimed not to have USMS contracts under its “custody or control,” but began producing these contracts following a court order.¹⁹ Because many of the USMS IGAs were initiated before the creation of the first ICE detention standards, they often do not reference clear applicable standards for detaining immigrants. Further, most of the USMS IGAs are of indefinite duration.

IV. A System in Disarray: NIJC’s Review of 94 Detention Center Contracts

Where possible, NIJC has annotated the following in the contracts posted at immigrantjustice.org/transparencyandhumanrights: 1) type of contract, 2) per diem rate, 3) contract effective and expiration dates, and 4) applicable ICE detention standards. We also have noted any additional specific standards incorporated into the contracts, such as DHS Prisoner Rape Elimination Act regulations²⁰, various versions of ICE directives on Sexual Abuse and Assault Prevention and Intervention, and ICE’s 2011 Review of the Use of Solitary Confinement.²¹

NIJC’s months-long review of the thousands of pages of contract documents revealed:

- **The immigration detention contracting process is convoluted and obscure.** Specific contracts and the ICE contracting officer deposition show a significant lack of uniformity in how contracts are created, executed, and maintained, particularly among facilities that operate under IGSA. This disarray presented enormous problems and delays as ICE struggled to respond to NIJC’s FOIA request. For example, ICE frequently grouped documents from county facilities in different states together as one facility because the counties had the same name — a filing error that the GAO said was also responsible for ICE misdirecting payments to the wrong contractors.
- **There is a lack of consistency and clarity as to which detention standards govern which facilities.** (See Figs. 3 and 4) Only 12 contracts (representing about 25 percent of the detention population covered by NIJC’s report), explicitly subject facilities to the 2011 PBNDS. While imperfect and based on a correctional rather than civil detention model, this set of standards provides the most robust protections for detained immigrants. A large number of contracts cite only the weaker and outdated ICE 2000 National Detention Standards or 2008 PBNDS, and several other contracts only generally reference “ICE detention standards” or do not mention any ICE standards at all. Many refer contrac-

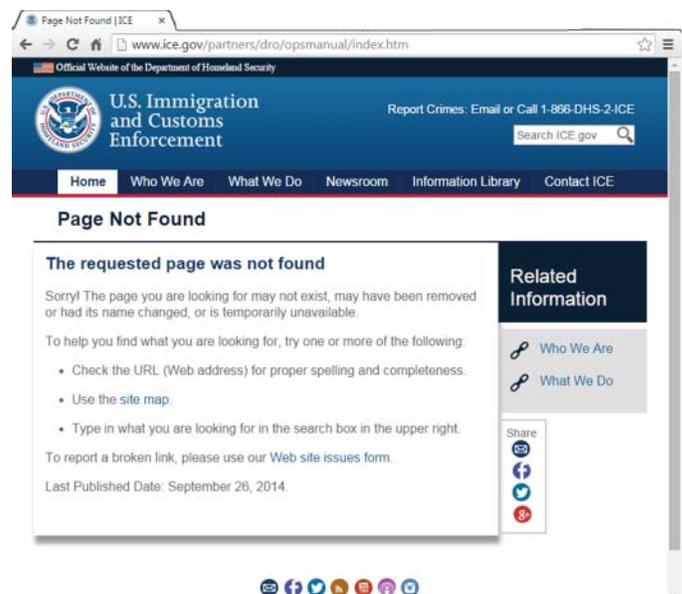
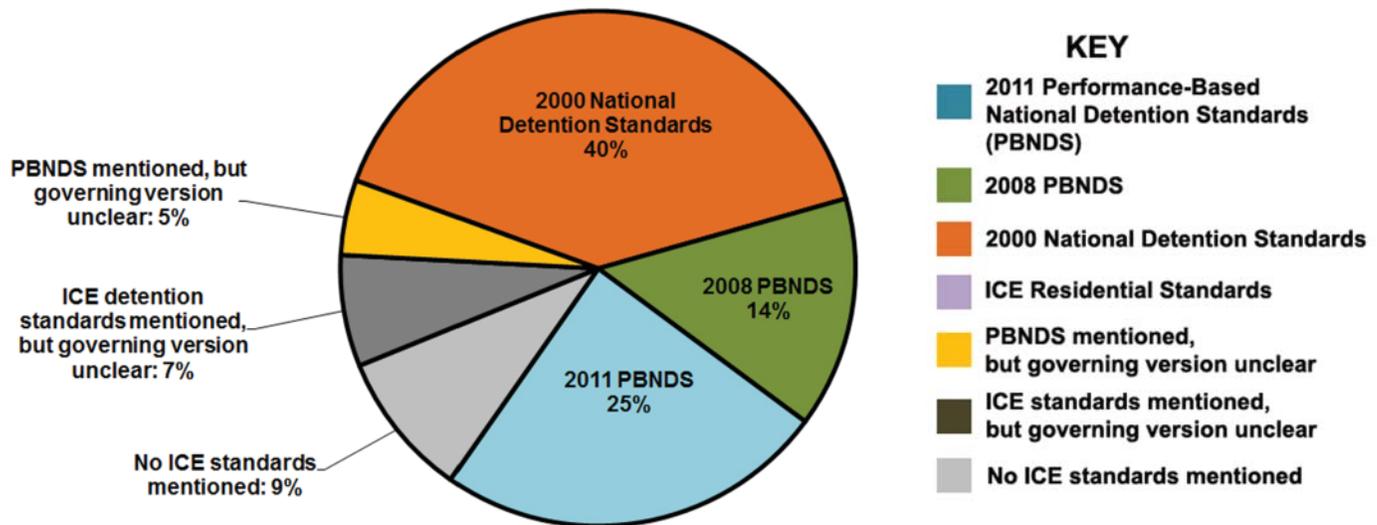


Fig. 3

Average daily population by detention standards specified in contracts



tors to web links to obtain more information about governing ICE detention standards, but those web links mostly are broken and lead to error pages on ICE’s website. The GAO reported that, to avoid opening full IGSA contracts to negotiation, ICE sometimes obtains a facility’s agreement to be inspected according to a more recent set of standards without explicitly incorporating the new standards into the contract.²² This practice makes it nearly impossible to know which standards apply to specific facilities, or how ICE informs facilities when they are subject to an updated set of detention standards. According to the GAO report, ICE officials “stated that they planned to request that all facilities with an ADP [average daily population] of 150 detainees or greater adopt the 2011 PBNDS by end of fiscal year 2014.”²³ NIJC does not know whether the agency followed through with this promise.

- **Forty-five facilities operate with indefinite contracts.** Most of the facilities that operate under indefinite contracts do not have ICE detention standards incorporated into their contracts or operate under the 2000 National Detention Standards. In other words, no renegotiation is built into the contracts to provide an opportunity to incorporate more updated standards or to question the efficacy of the facility’s use.
- **Tracking the costs of immigration detention is daunting.** Per diem payments range from \$40 to \$133 per individual depending on the facility, but the formula used to calculate those rates and what they include vary significantly. For example, some contracts include guards, transportation, and other services within the “per diem” rate, while other contracts list such services as separate line items. In 2014, the GAO found that even ICE’s internal systems to track costs at each facility were inadequate “because of errors in how ICE field office personnel enter data ... and limitations in the system.”²⁴
- **The practice of contracting and subcontracting with private entities shields the DHS immigration detention system from public (taxpayer) scrutiny.**
 - ✓ While nine of the contracts NIJC received are between ICE and private prison companies, based on a review of the CCA and GEO Group websites at least 13 other facilities are contracted to local governments which then subcontract the detention centers’ administration to those companies. While some IGSA contracts contain clauses binding subcontractors to their terms, the subcontractor relationships often are not articulated in the contract language.

Fig. 4

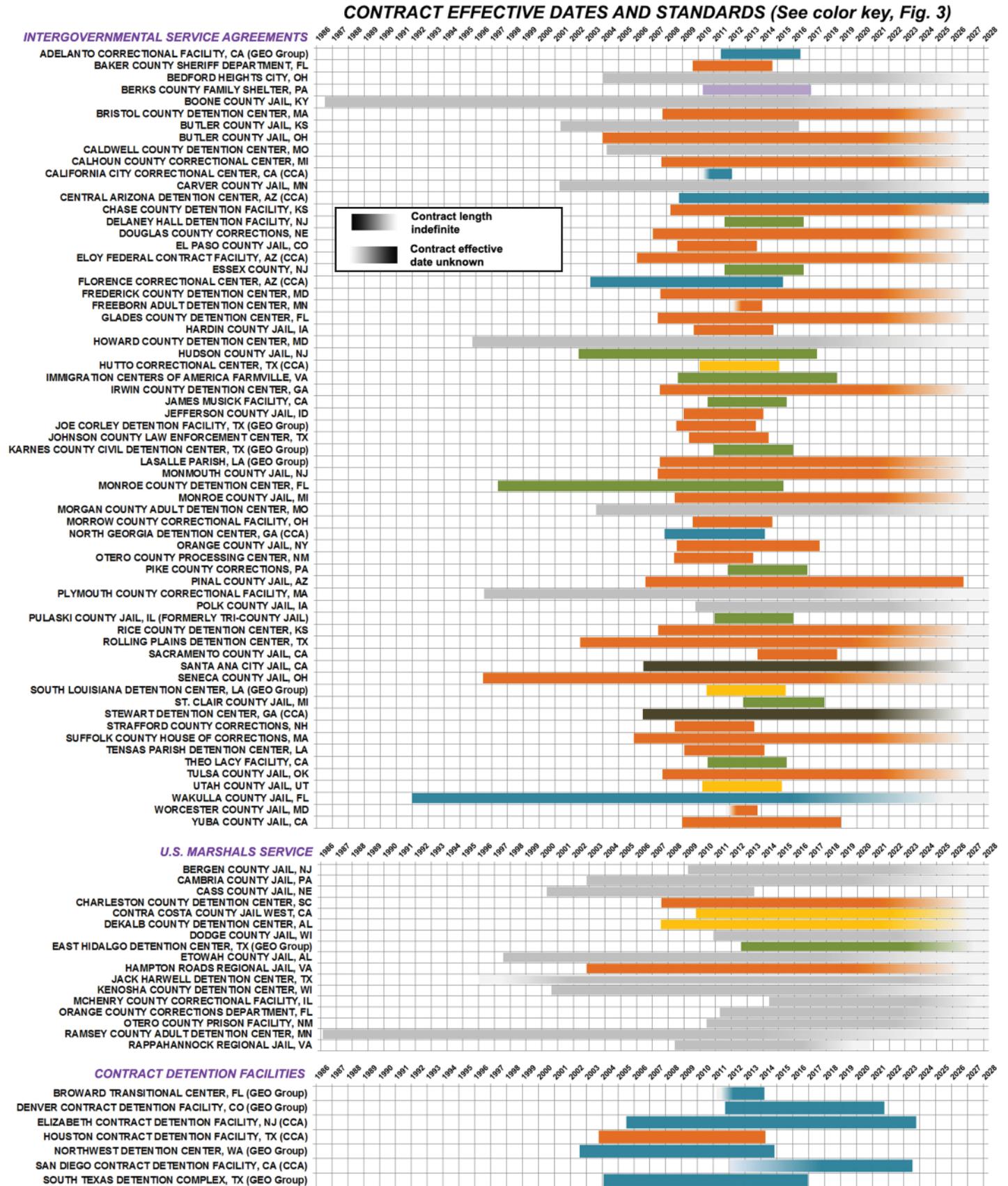


Fig. 5

DETENTION FACILITY	PER DIEM
ADELANTO CORRECTIONAL FACILITY, CA (GEO Group)	\$59.37 to \$111.04
BAKER COUNTY SHERIFF DEPARTMENT, FL	\$84.72
BEDFORD HEIGHTS CITY, OH	\$65.00
BERGEN COUNTY JAIL, NJ	\$110.00
BERKS COUNTY FAMILY SHELTER, PA	\$288.00
BOONE COUNTY JAIL, KY	\$44.65 (disputed)
BRISTOL COUNTY DETENTION CENTER, MA	\$90.00
BROWARD TRANSITIONAL CENTER, FL (GEO Group)*	\$112.91 for up to 500 guaranteed, \$6.42 for 501-700
BUTLER COUNTY JAIL, KS	\$60.80
BUTLER COUNTY JAIL, OH	\$53.20
CALDWELL COUNTY DETENTION CENTER, MO	\$65.97
CALHOUN COUNTY CORRECTIONAL CENTER, MI	\$63.76
CALIFORNIA CITY CORRECTIONAL CENTER, CA (CCA)	\$77.50
CAMBRIA COUNTY JAIL, PA	\$51.53
CARVER COUNTY JAIL, MN	\$70 for adults, \$140 for juveniles
CASS COUNTY JAIL, NE	\$58.53
CENTRAL ARIZONA DETENTION CENTER, AZ (CCA)*	\$90.00
CHARLESTON COUNTY DETENTION CENTER, SC	\$55.00
CHASE COUNTY DETENTION FACILITY, KS	\$48.50
CLINTON COUNTY CORRECTIONAL FACILITY, PA*	\$67.00
CONTRA COSTA COUNTY JAIL WEST, CA	\$82.00
DEKALB COUNTY DETENTION CENTER, AL	\$47.00
DELANEY HALL DETENTION FACILITY, NJ	\$108.00
DENVER CONTRACT DETENTION FACILITY, CO (GEO Group)*	\$130.34 for first 300, \$11.08 for all over 300
DODGE COUNTY JAIL, WI	\$75.00
DOUGLAS COUNTY CORRECTIONS, NE	\$73.63
EAST HIDALGO DETENTION CENTER, TX (GEO Group)	\$59.26
EL PASO COUNTY JAIL, CO	\$62.40
ELIZABETH CONTRACT DETENTION FACILITY, NJ (CCA)*	\$123.20
ELOY FEDERAL CONTRACT FACILITY, AZ (CCA)	\$64.47
ESSEX COUNTY, NJ	\$108.00
ETOWAH COUNTY JAIL, AL	\$40.00
FLORENCE CORRECTIONAL CENTER, AZ (CCA)*	\$87.26
FRANKLIN COUNTY HOUSE OF CORRECTIONS, MA*	\$96.00
FREDERICK COUNTY DETENTION CENTER, MD*	\$83.00
FREEBORN ADULT DETENTION CENTER, MN*	\$77.02
GLADES COUNTY DETENTION CENTER, FL	\$80.64
HAMPTON ROADS REGIONAL JAIL, VA	\$75.69
HARDIN COUNTY JAIL, IA	\$75.96
HENDERSON DETENTION FACILITY, NC	\$70.00
HOUSTON CONTRACT DETENTION FACILITY, TX (CCA)*	\$102.97
HOWARD COUNTY DETENTION CENTER, MD	\$70.00
HUDSON COUNTY JAIL, NJ	\$110.00
HUTTO CORRECTIONAL CENTER, TX (CCA)	Redacted
IMMIGRATION CENTERS OF AMERICA FARMVILLE, VA	\$92.97 for 2011 PBNDs Minimal standards option or \$94.54 for 2011 PBNDs Optimal standards option (final option not indicated); discounts applied once population exceeds 500
IRWIN COUNTY DETENTION CENTER, GA	\$45.00
JACK HARWELL DETENTION CENTER, TX	\$69.00
JAMES MUSICK FACILITY, CA	\$118.00
JEFFERSON COUNTY JAIL, ID	\$62.69
JOE CORLEY DETENTION FACILITY, TX (GEO Group)	\$63.00
JOHNSON COUNTY LAW ENFORCEMENT CENTER, TX	\$59.72
KARNES COUNTY CIVIL DETENTION CENTER, TX (GEO Group)	\$68.75
KENOSHA COUNTY DETENTION CENTER, WI	\$70.00
KEOGH-DWYER CORRECTIONAL FACILITY, NJ*	\$95.00
LAREDO PROCESSING CENTER, TX (CCA)*	\$59.79
LASALLE COUNTY REGIONAL DETENTION CENTER, TX*	\$58.00
LASALLE PARISH, LA (GEO Group)	\$45.00 to \$75.00
MCHENRY COUNTY CORRECTIONAL FACILITY, IL	\$95.00
MONMOUTH COUNTY JAIL, NJ	\$105.00
MONROE COUNTY DETENTION CENTER, FL	\$87 for up to 50 people, \$25 for 51-72
MONROE COUNTY JAIL, MI	\$74.96
MORGAN COUNTY ADULT DETENTION CENTER, MO	\$65.10
MORROW COUNTY CORRECTIONAL FACILITY, OH	\$53.64
NORTH GEORGIA DETENTION CENTER, GA (CCA)	\$79.00
NORTHWEST DETENTION CENTER, WA (GEO Group)*	\$102.09 for 1-1,181 detainees; \$63.18 for over 1,181 detainees
ORANGE COUNTY CORRECTIONS DEPARTMENT, FL	\$88.00
ORANGE COUNTY JAIL, NY	\$133.93
OTERO COUNTY PRISON FACILITY, NM	\$61.85
OTERO COUNTY PROCESSING CENTER, NM	\$96.99
PIKE COUNTY CORRECTIONS, PA	\$82.31
PINAL COUNTY JAIL, AZ	\$59.64
PLYMOUTH COUNTY CORRECTIONAL FACILITY, MA	\$80.91
POLK COUNTY ADULT DETENTION FACILITY, TX*	\$57.65
POLK COUNTY JAIL, IA	\$95.00
PULASKI COUNTY JAIL, IL (FORMERLY TRI-COUNTY JAIL)	\$76.00
RAMSEY COUNTY ADULT DETENTION CENTER, MN	\$80.00
RAPPAHANNOCK REGIONAL JAIL, VA	\$60.00
RICE COUNTY DETENTION CENTER, KS	\$50.00
ROLLING PLAINS DETENTION CENTER, TX	\$57.67
SACRAMENTO COUNTY JAIL, CA	\$100.00
SAN DIEGO CONTRACT DETENTION FACILITY, CA (CCA)*	\$122.23
SANTA ANA CITY JAIL, CA	\$82.00
SENECA COUNTY JAIL, OH	\$58.00
SHERBURNE COUNTY JAIL, MN*	\$80.00
SOUTH LOUISIANA DETENTION CENTER, LA (GEO Group)	\$53.02
SOUTH TEXAS DETENTION COMPLEX, TX (GEO Group)*	\$84.50 for 1-1,300, \$9.12 for 1,301+
ST. CLAIR COUNTY JAIL, MI*	\$84.05
STEWART DETENTION CENTER, GA (CCA)	\$60.00
STRAFFORD COUNTY CORRECTIONS, NH	\$67.34
SUFFOLK COUNTY HOUSE OF CORRECTIONS, MA	\$90.00
TENSAS PARISH DETENTION CENTER, LA	\$46.76
THEO LACY FACILITY, CA	\$118.00
TULSA COUNTY JAIL, OK	\$54.13
UTAH COUNTY JAIL, UT	\$72.25
WAKULLA COUNTY JAIL, FL	\$74.54
WORCESTER COUNTY JAIL, MD	\$87.11
YORK COUNTY PRISON, PA	\$59.71
YUBA COUNTY JAIL, CA	\$75.16

* Per diem data obtained from 2011 or 2012 ICE inspection reports

✓ Almost all per diem rates are redacted from private contracts received by NIJC, under the guise of a FOIA exemption that protects “[t]rade secrets and commercial or financial information obtained from a person and privileged or confidential.”²⁵ However, ICE failed to redact those per diems from the cover pages of their inspection reports, which allowed NIJC to create a comprehensive list of per diem rates for 98 detention centers. (See Fig. 5) The inspections will be published later this year.

- **At least 12 contracts will expire in the next three years**, which could provide an opportunity for advocates to raise questions about the efficacy of keeping these facilities open and ensure any modifications or extensions contain robust standards. (See Fig. 6)

Fig. 6

DETENTION FACILITY	CONTRACT EXPIRES
ADELANTO CORRECTIONAL FACILITY, CA (GEO Group)	5/31/2016
BERKS COUNTY FAMILY SHELTER, PA	2/1/2017
BUTLER COUNTY JAIL, KS	4/24/2016
DELANEY HALL DETENTION FACILITY, NJ	8/11/2016
ESSEX COUNTY, NJ	8/11/2016
HUDSON COUNTY JAIL, NJ	6/7/2017
KARNES COUNTY CIVIL DETENTION CENTER, TX (GEO Group)	12/7/2015
ORANGE COUNTY JAIL, NY	8/12/2017
PIKE COUNTY CORRECTIONS, PA	11/8/2016
PULASKI COUNTY JAIL, IL (FORMERLY TRI-COUNTY JAIL)	12/19/2015
SOUTH TEXAS DETENTION COMPLEX, TX (GEO Group)	11/30/2016
ST. CLAIR COUNTY JAIL, MI	11/30/2017

V. Transparency is a Human Rights Issue

ICE’s transparency problem is a human rights problem. As Grassroots Leadership found in its April 2015 report, when the U.S. government allows private companies and local governments to profit by warehousing people far from public scrutiny and government accountability, no matter how “civil” the detention facilities appear, the men, women, and children in custody become little more than inventory.²⁶

A 2015 report by the Detention Watch Network and the Center for Constitutional Rights highlights the “guaranteed minimums” contained in some ICE detention contracts, which bind the government to pay for a minimum number of detention beds and places pressure on immigration officials to incarcerate immigrants to meet those quotas.²⁷ The experiences immigrants describe once they are within the walls of the isolated detention centers show how the system reduces human lives to mere fodder in a business transaction.

NIJC staff recently visited the Eloy Detention Center in Arizona, an IGSA facility which the City of Eloy subcontracts to CCA. During the visit, a man detained there for more than two years shared his frustration at the recent “rationing” of hygienic supplies and food, echoing similar complaints that NIJC has heard from individuals in DHS custody at other facilities.²⁸ Given the multimillion-dollar Eloy contract, it is unconscionable that the facility would lack toilet paper and food to meet the daily needs of the men and women in its care.

NIJC invites the public to scrutinize the ICE contracts, particularly for detention facilities in their own regions, and voice concerns to ICE and representatives in Congress.

VI. Recommendations

NIJC calls on ICE to:

1. Post the following information on its website on an ongoing basis:

- Most-current ICE contracts
- Details on what facilities ICE uses and who operates them, contract awards, per diems and capacity at each facility, and the average daily population of individuals detained in each
- Information about which standards apply to each detention center, and how ICE enforces those standards

2. Require all detention facilities to immediately adhere to the 2011 Performance-Based National Detention Standards, and terminate contracts for facilities which are unable or unwilling to meet these standards.

3. End the practice of entering into indefinite contracts and revisit any existing contracts which do not contain explicit renegotiation dates.

4. Refrain from contracting with private corporations or other entities that require guaranteed payments for a minimum number of immigration detention beds, and modify existing contracts to remove guaranteed bed minimum payments. If the contractor is unwilling to make such a modification, ICE should terminate the contract.

5. Throughout the contracts negotiation process for individual detention facilities, engage with legal service providers, faith groups, and other local and national non-governmental organizations that visit facilities, to address human rights and due process issues they observe.

Two ways to take action to demand transparency and defend human rights:

1. **Learn more:** Participate in an upcoming webinar series, hosted by NIJC in partnership with allies in the immigration detention reform movement, to learn more about the FOIA documents and help begin a conversation about how to increase public scrutiny and build pressure to achieve more accountability in the broken ICE immigration detention system. **The first webinar will take place on Thursday, August 27, 2015 at 12 p.m. PDT/2 p.m. CDT/3 p.m. EDT. Register at immigrantjustice.org/ICEcontracts-webinar.**
2. **Raise your voice:** NIJC and the Detention Watch Network will soon release an action toolkit to help communities and activists use these FOIA documents to call for an end to inhumane immigration detention.

NIJC calls on Congress to increase government transparency and improve oversight of ICE by passing the following two pieces of legislation:

1. Accountability in Immigration Detention Act, sponsored by Rep. Adam Smith (D-WA): Originally introduced in 2014 and re-introduced in 2015, this bill establishes minimum detention standards to ensure that everyone in immigration detention is treated humanely. The bill requires all detention facilities to comply with the most recent detention standards and subjects non-compliant facilities to “meaningful” financial penalties. In addition, the bill mandates public disclosure of all contracts, memoranda of agreement, evaluations, and reviews related to immigration detention facilities.

2. Protecting Taxpayers and Communities from Local Detention Quotas Act, sponsored by Reps. Ted Deutch (D-FL), Bill Foster (D-IL), and Smith: Introduced in 2015, this bill prohibits ICE from entering into contracts that provide detention centers with prepaid, guaranteed numbers of filled beds each day.

VII. Endnotes

1. See NIJC’s original FOIA request (April 27, 2011). Available at http://www.immigrantjustice.org/court_cases/contracts-and-audits-foia-litigation-nijc-v-dhs
2. See the Northern District of Illinois Eastern District order granting summary judgment in favor of NIJC, ordering DHS to respond to NIJC’s FOIA request (February 1, 2015). Available at http://www.immigrantjustice.org/court_cases/contracts-and-audits-foia-litigation-nijc-v-dhs
3. Department of Homeland Security Office of Inspector General, *ICE’s Release of Immigration Detainees* OIG-14-116 (Revised) (August 2014). https://www.oig.dhs.gov/assets/Mgmt/2014/OIG_14-116_Aug14.pdf
4. Links to the annotated detention center contracts are available at immigrantjustice.org/transparencyandhumanrights. See also the NIJC deposition of a former ICE contracting officer in *National Immigrant Justice Center v. Department of Homeland Security*, Washington, D.C. (January 29, 2014). Posted with NIJC’s annotations at <https://www.documentcloud.org/documents/2105816-neveleffs-deposition.html>.
5. U.S. Government Accountability Office (GAO) Report to Congressional Requestors, *Immigration Detention: Additional Actions Needed to Strengthen Management and Oversight of Facility Costs and Standards* GAO-15-153, October 2014. Posted with NIJC’s annotations at <https://www.documentcloud.org/documents/2168965-government-accountability-of-foice-october-2014.html>
6. U.S. President, Memorandum, “Freedom of Information Act,” *Federal Register* 74, no. 15 (January 26, 2009): 4683. <http://www.justice.gov/sites/default/files/oip/legacy/2014/07/23/presidential-foia.pdf>
7. Nina Bernstein, “U.S. to Reform Policy on Detention for Immigrants,” *The New York Times* (August 5, 2009). <http://www.nytimes.com/2009/08/06/us/politics/06detain.html?pagewanted=all&r=1&>
8. Dora Schriro, Department of Homeland Security Immigration and Customs Enforcement, *Immigration Detention Overview and Recommendations* (October 6, 2009). <http://www.ice.gov/doclib/about/offices/odpp/pdf/ice-detention-rpt.pdf>
9. Wil S. Hylton, “The Shame of America’s Family Detention Camps,” *The New York Times* (February 4, 2015). <http://www.nytimes.com/2015/02/08/magazine/the-shame-of-americas-family-detention-camps.html?r=0>
10. Jason Buch, “Critics Frown at ICE Jail Contracts,” *San Antonio Express-News* (October 11, 2014). <http://www.express-news.com/news/local/article/Critics-frown-at-ICE-jail-contracts-5817099.php>
11. NIJC’s *These Lives Matter* blog has logged reports of deaths and other abuses in immigration detention centers dating back to January 2009. <http://theselivesmatter.tumblr.com>
12. Jacqueline Stevens, “America’s Secret ICE Castles,” *The Nation* (December 16, 2009). <http://www.thenation.com/article/americas-secret-ice-castles>

13. ICE's FOIA Library website is at <http://www.ice.gov/foia/library>
14. Grassroots Leadership, *PAYOFF: How Congress Ensures Private Prison Profit with an Immigrant Detention Quota* (April 2015). <http://grassrootsleadership.org/reports/payoff-how-congress-ensures-private-prison-profit-immigrant-detention-quota>
15. Assistant Director for the ICE Office of Detention Policy and Planning Kevin Landy testified before the U.S. Commission on Civil Rights in January 2015 that "PBNDS 2011 currently applies to detention facilities housing approximately 60% of ICE's average daily detainee population, including all dedicated ICE facilities (that is, a facility that exclusively houses ICE detainees)." [http://www.usccr.gov/OIG/Kevin_Landy_USCCR_Opening_Statement_\(1-30-2015\).pdf](http://www.usccr.gov/OIG/Kevin_Landy_USCCR_Opening_Statement_(1-30-2015).pdf)
16. The Federal Acquisition Regulation is at <https://www.acquisition.gov/?q=browsefar>
17. Becky Malkovich, "Inmates Sue ICE, Jefferson County," *The Southern Illinoian* (February 7, 2013). http://thesouthern.com/news/local/inmates-sue-ice-jefferson-county/article_06035ee0-70e5-11e2-83df-0019bb2963f4.html
18. Joseph Summerill, "Negotiating New ICE IGA Per Diem Rate," (presentation, McHenry County Sheriff's Office, April 9, 2013). <http://www.immigrantjustice.org/documents/summerillpresentation>
19. See the Northern District of Illinois Eastern District order (February 1, 2015). Available at http://www.immigrantjustice.org/court_cases/contracts-and-audits-foia-litigation-nijc-v-dhs
20. Standards To Prevent, Detect, and Respond to Sexual Abuse and Assault in Confinement Facilities, 6 CFR Part 115 2014. <http://www.gpo.gov/fdsys/pkg/FR-2014-03-07/pdf/2014-04675.pdf>
21. U.S. Immigration and Customs Enforcement, Directive, "Review of the Use of Segregation for ICE Detainees" (September 4, 2013). http://www.ice.gov/doclib/detention-reform/pdf/segregation_directive.pdf
22. See NIJC annotation of GAO report: <https://www.documentcloud.org/documents/2168965-government-accountability-office-october-2014.html#document/p35/a227798>
23. See NIJC annotation of GAO report: <https://www.documentcloud.org/documents/2168965-government-accountability-office-october-2014.html#document/p37/a227799>
24. See NIJC annotation of GAO report: <https://www.documentcloud.org/documents/2168965-government-accountability-office-october-2014.html#document/p18/a227802>
25. Freedom of Information Act, 5 U.S.C. § 552(b)(4). See exemption: <http://www.justice.gov/oip/foia-guide-2004-edition-exemption-4>
26. Grassroots Leadership.
27. Detention Watch Network and Center for Constitutional Rights, *Banking on Detention: Local Lockup Quotas and the Immigrant Dragnet* (2015). http://www.detentionwatchnetwork.org/sites/default/files/Banking_on_Detention_DWN.pdf
28. Associated Press, "Immigration Detention Centers in Kentucky, Illinois Violate Rights, Report Says," *Fox News Latino* (December 12, 2011). <http://latino.foxnews.com/latino/news/2011/12/12/3-immigrant-detention-centers-in-kentucky-illinois-violate-rights-report-says/>

VIII. Attachment: Raw Data

Raw Data from ICE Detention Facilities Contracts and Inspections 2007-2012, obtained by the National Immigrant Justice Center via Freedom of Information Act litigation (Released August 2015)

DETENTION FACILITY	CONTRACT TYPE	RECEIVED	CONTRACT EFFECTIVE DATE	EXPIRES	PER DIEM	ICE DETENTION STANDARDS	ADDITIONAL ICE STANDARDS	ADP*
ABELANTO CORRECTIONAL FACILITY, CA (GEO Group)	IGSA	X	5/27/2011	5/31/2016	\$59.27 to \$111.04	2011 PBNDS		613
BAKER COUNTY SHERIFF DEPARTMENT, FL	IGSA	X	8/31/2009	Indefinite	84.72	2000 NDS		952
BEDFORD HEIGHTS CITY, OH	IGSA	X	12/9/2003	Indefinite	65.72	None Stated	2011 SAAPI	40
BERGEN COUNTY JAIL, NJ	USMS	X	3/23/2009	Indefinite	110	None Stated	PREA	114
BERKS COUNTY FAMILY SHELTER, PA	IGSA	X	3/30/2010	2/1/2017	288	ICE Residential Standards		Not provided
BOONE COUNTY JAIL KY	IGSA	X	6/23/1986	Indefinite	\$44.65 (disputed)	None Stated		139
BRISTOL COUNTY DETENTION CENTER, MA	IGSA	X	9/27/2007	Indefinite	90	2000 NDS		206
BROWARD TRANSITIONAL CENTER, FL (GEO Group)	IGSA	X	Unknown	2/28/2014	\$112.81 for up to 500 guaranteed; \$6.42 for 501-700	2011 PBNDS	PREA	636
BUFFALO FEDERAL DETENTION CENTER, NY	SFC	X						
BUTLER COUNTY JAIL, KS	IGSA	X	4/24/2001	4/24/2016	60.8	None Stated		514
BUTLER COUNTY JAIL, OH	IGSA	X	12/16/2003	Indefinite	53.2	2000 NDS		12
CALDWELL COUNTY DETENTION CENTER, MO	IGSA	X	3/19/2004	Indefinite	85.97	None Stated		106
CALHOUN COUNTY CORRECTIONAL CENTER, MI	IGSA	X	8/21/2007	Indefinite	83.76	2000 NDS		37
CALIFORNIA CITY CORRECTIONAL CENTER, CA (CCA)	IGSA	X	Unknown	1/31/2012	77.5	2011 PBNDS	PREA	156
CAMBRIA COUNTY JAIL, PA	USMS	X	10/14/2002	Indefinite	51.53	None Stated		118
CARVER COUNTY JAIL, MN	IGSA	X	3/23/2001	Indefinite	\$70 for adults; \$140 for juveniles	None Stated		28
CASS COUNTY JAIL, NE	USMS	X	4/12/2000	5/31/2013	86.53	None Stated		28
CENTRAL ARIZONA DETENTION CENTER, AZ (CCA)	IGSA	X	10/12/2008	4/7/2027	90	2011 PBNDS		73
CHARLESTON COUNTY DETENTION CENTER, SC	USMS	X	7/10/2007	Indefinite	85	2000 NDS		42
CHASE COUNTY DETENTION FACILITY, KS	IGSA	X	3/17/2008	Indefinite	48.5	2000 NDS		25
CLINTON COUNTY CORRECTIONAL FACILITY, PA	IGSA	X	9/21/2009	Indefinite	87	Unclear PBNDS		103
CONTRA COSTA COUNTY SHERIFFS OFFICE, CA	USMS	X	7/1/2009	Indefinite	82	2008 PBNDS		102
DELANEY HALL DETENTION FACILITY, NJ	IGSA	X	8/11/2011	8/11/2016	108	2008 PBNDS		35
DENVER CONTRACT DETENTION FACILITY, CO (GEO Group)	IGSA	X	9/16/2011	9/15/2021	\$130.34 for first 300; \$11.08 for all over 300	2011 PBNDS	2014 SAAPI	297
DODGE COUNTY JAIL, WI	USMS	X	11/1/2010	Indefinite	75	None Stated		400
DOUGLAS COUNTY CORRECTIONS, NE	IGSA	X	2/16/2007	Indefinite	73.63	2000 NDS	PREA	225
EAST HIDALGO DETENTION CENTER, TX (GEO Group)	USMS	X	7/24/2012	Indefinite	59.26	2008 PBNDS		108
EL CENTRO SERVICE PROCESSING CENTER, CA	SFC	X						175
EL PASO COUNTY JAIL, CO	IGSA	X	8/25/2008	8/25/2013	62.4	2000 NDS		480
EL PASO SERVICE PROCESSING CENTER, TX	SFC	X						21
ELIZABETH CONTRACT DETENTION FACILITY, NJ (CCA)	IGSA	X	-07/01/05	9/20/2023	123.2	2011 PBNDS		605
ELOY FEDERAL CONTRACT FACILITY, AZ (CCA)	IGSA	X	2/17/2006	Indefinite	84.47	2000 NDS		292
ESSEX COUNTY, NJ	USMS	X	8/17/2011	Indefinite	108	2008 PBNDS		1479
ETOWAH COUNTY JAIL, AL	USMS	X	7/8/1987	Indefinite	40	None Stated	PREA; 2011 PBNDS Food Service Standard	333
FLORENCE CORRECTIONAL CENTER, AZ (CCA)	IGSA	X	3/5/2003	4/15/2015	87.26	2011 PBNDS		204
FLORENCE SERVICE PROCESSING CENTER, AZ	SFC	X	5/1/2003					384
FRANKLIN COUNTY HOUSE OF CORRECTIONS, MA	IGSA	X	N/A	2/27/2015	86	2000 NDS		1
FREDERICK COUNTY DETENTION CENTER, MD	IGSA	X	8/1/2007	Indefinite	83	2000 NDS	2014 SAAPI	52
FREEDORN ADULT DETENTION CENTER, MN	IGSA	X	Redacted	2014	77.02	2000 NDS	2014 SAAPI	70
GLADES COUNTY DETENTION CENTER, FL	USMS	X	5/30/2007	Indefinite	80.64	2000 NDS	2014 SAAPI	428
HAMPTON ROADS REGIONAL JAIL, VA	USMS	X	10/22/2002	Indefinite	75.69	2000 NDS	2014 SAAPI	349
HARDIN COUNTY JAIL, IA	IGSA	X	9/12/2009	9/12/2014	75.96	2000 NDS	2014 SAAPI	96
HENDERSON DETENTION FACILITY, NC	IGSA	X	N/A	10/18/2008	70	2000 NDS		25
HOUSTON CONTRACT DETENTION FACILITY, TX (CCA)	IGSA	X	10/1/2003	3/31/2014	102.97	None Stated	SAAPI	853
HOUSTON COUNTY DETENTION CENTER, MD	IGSA	X	6/7/895	Indefinite	110	Unclear PBNDS	2008 PBNDS	423
HUNTSVILLE COUNTY JAIL, TN	IGSA	X	8/2/2008	8/2/2015	86	2008 PBNDS		500
HUTO CORRECTIONAL CENTER, TX (CCA)	IGSA	X	1/27/2010	1/27/2015	Redacted	2008 PBNDS		399
IMMIGRATION CENTERS OF AMERICA FARMVILLE, VA	IGSA	X	9/9/2008	9/15/2018	\$92.97 for 2011 PBNDS Minimal standards option or \$94.54 for 2011 PBNDS Optimal standards option (final option not indicated); discounts applied once population exceeds 500			
IRWIN COUNTY DETENTION CENTER, GA	IGSA	X	7/25/2007	Indefinite	45	2000 NDS		398
JACK HARWELL DETENTION CENTER, TX	USMS	X	12/8/1998 (agreement seems to predate this)	Indefinite	69	None Stated	PREA	4
JAMES MUISICK FACILITY, CA	IGSA	X	7/20/2010	7/19/2015	118	2008 PBNDS		321
JEFFERSON COUNTY JAIL, ID	IGSA	X	1/23/2009	1/23/2014	62.69	2000 NDS		3
JOE CORLEY DETENTION FACILITY, TX (GEO Group)	IGSA	X	7/31/2008	7/31/2013	63	2000 NDS		580
JOHNSON COUNTY LAW ENFORCEMENT CENTER, TX	IGSA	X	5/21/2009	5/21/2014	59.72	2000 NDS	SAAPI	212
KARNES COUNTY CIVIL DETENTION CENTER, TX (GEO Group)	IGSA	X	1/27/2010	1/27/2015	68.75	2008 PBNDS	ICE Residential Standards	280
KENOSHA COUNTY DETENTION CENTER, WI	USMS	X	8/1/2000	Indefinite	70	None Stated		23
KEOGH-DWYER CORRECTIONAL FACILITY, NJ	IGSA	X			85	None Stated		23
KROME NORTH SERVICE PROCESSING CENTER, FL	SFC	X						954
LAREDO PROCESSING CENTER, TX (CCA)	IGSA	X	N/A	12/31/2014	59.79	2000 NDS		294
LASALLE COUNTY REGIONAL DETENTION CENTER, TX	IGSA	X	7/24/2007	Indefinite	86	2000 NDS		90
LASALLE PARISH, LA (GEO Group)	USMS	X	8/6/2014	Indefinite	85	None Stated	PREA	906
MCHEERY COUNTY CORRECTIONAL FACILITY, IL	USMS	X	3/30/2007	Indefinite	85	2000 PBNDS		265
MONROE COUNTY JAIL, IN	IGSA	X	3/13/1997	4/30/2015	\$87 for up to 50 people; \$25 for 51-72	2008 PBNDS	SAAPI	232
MONROE COUNTY DETENTION CENTER, FL	IGSA	X	-06/26/08	Indefinite	74.86	2000 NDS		83
MONROE COUNTY JAIL, MI	IGSA	X	7/18/2003	Indefinite	65.1	2000 NDS		13
MORGAN COUNTY ADULT DETENTION CENTER, MO	IGSA	X	8/17/2009	Indefinite	53.64	2000 NDS		139
MORROW COUNTY CORRECTIONAL FACILITY, OH	IGSA	X	8/17/2003	Indefinite	65.1	2000 NDS		48
NORTH GEORGIA DETENTION CENTER, GA (CCA)	IGSA	X	11/12/2007	3/5/2014	79	2011 PBNDS	PREA	961
NORTHWEST DETENTION CENTER, WA (GEO Group)	IGSA	X	7/26/2002	10/23/2014	\$102.09 for 1-1,181 detainees; \$63.18 for over 1,181 detainees	2011 PBNDS		1236
ORANGE COUNTY CORRECTIONS DEPARTMENT, FL	USMS	X	3/22/2011	Indefinite	88	None Stated	PREA	78
ORANGE COUNTY JAIL, NY	IGSA	X	8/12/2008	Indefinite	133.93	2000 NDS		104

*ADP= Average Daily Population (some data obtained from FY 2011 and FY 2012 ICE inspection reports, forthcoming in late 2015)

Raw Data from ICE Detention Facilities Contracts and Inspections 2007-2012, obtained by the National Immigrant Justice Center via Freedom of Information Act litigation
(Released August 2015)

DETENTION FACILITY	CONTRACT TYPE	RECEIVED	CONTRACT EFFECTIVE DATE	EXPIRES	PER DIEM	ICE DETENTION STANDARDS	ADDITIONAL ICE STANDARDS	ADP*
OTERO COUNTY PRISON FACILITY, NM	USMS	X	5/24/2010	Indefinite	61.65	2000 NDS	PREA	69
OTERO COUNTY PROCESSING CENTER, NM	IGSA	X	6/12/2008	6/12/2013	68.89	2000 NDS		620
PIKE COUNTY CORRECTIONS, PA	IGSA	X	11/02/11	1/16/2016	82.31	2008 PBNDIS	2014, SAAPI	161
PINAL COUNTY JAIL, AZ	IGSA	X	8/26/2006	4/6/62	59.64	2000 NDS	SAAPI	419
PLYMOUTH COUNTY CORRECTIONAL FACILITY, MA	IGSA	X	7/11/1996	Indefinite	86.91	None Stated		265
POLK COUNTY ADULT DETENTION FACILITY, TX	USMS	X		Indefinite	57.65	None Stated		661
POLK COUNTY JAIL, IA	IGSA	X	10/21/2009	Indefinite	95	None Stated	PREA	60
PORT ISABEL SERVICE PROCESSING CENTER, TX (Ahtna, Inc.)	SFC	X	12/29/2010	5/31/2013	76	2000 NDS		1041
PULASKI COUNTY JAIL, IL (FORMERLY TRI-COUNTY JAIL)	USMS	X	2/10/1996	Indefinite	80	2008 PBNDIS		224
RAMSEY COUNTY ADULT DETENTION CENTER, MN	USMS	X	5/20/2008	Unknown	60	None Stated		53
RAPPANNOCK REGIONAL JAIL, VA	USMS	X	6/11/2007	Indefinite	50	2000 NDS		185
RICE COUNTY DETENTION CENTER, KS	IGSA	X	7/19/2002	Indefinite	57.67	2000 NDS		10
ROLLING PLAINS DETENTION CENTER, TX	IGSA	X	9/12/2013	Indefinite	100	2000 NDS		488
SACRAMENTO COUNTY JAIL, CA	IGSA	X	Undeclared	6/30/2023	\$122.23	2011 PBNDIS		131
SAN DIEGO CONTRACT DETENTION FACILITY, CA (CCA)	CPF	X	7/3/2006	Indefinite	82	Unclear		662
SANTA ANA CITY JAIL, CA	IGSA	X	6/12/1996	Indefinite	58	2000 NDS		185
SENECA COUNTY JAIL, OH	IGSA	X		Indefinite	80	2000 NDS		61
SHERBURNE COUNTY JAIL, MN	IGSA	X		Indefinite	58	2000 NDS		114
SOUTH LOUISIANA DETENTION CENTER, LA (GEO Group)	IGSA	X	06/23/10 (Approx)	6/23/2015	53.02	Unclear PBNDIS	SAAPI	372
SOUTH TEXAS DETENTION COMPLEX, TX (GEO Group)	CPF	X	1/23/2004	11/30/2016	\$64.50 for 1-1,300; \$9.12 for 1,301+	2011 PBNDIS		1665
ST. CLAIR COUNTY JAIL, MI	IGSA	X	10/22/2012	Indefinite	84.05	2008 PBNDIS		98
STEWART DETENTION CENTER, GA (CCA)	IGSA	X	6/30/2006	Indefinite	60.5	Unclear		1632
STRAFFORD COUNTY CORRECTIONS, NH	IGSA	X	6/27/2008	6/27/2013	67.34	2000 NDS		20
SUFFOLK COUNTY HOUSE OF CORRECTIONS, MA	IGSA	X	2/12/2005	Indefinite	89	2000 NDS		240
TARRANT COUNTY DETENTION CENTER, LA	IGSA	X	7/20/2010	7/19/2014	117.6	2008 PBNDIS	SAAPI	459
THEACRE COUNTY DETENTION CENTER, LA	IGSA	X	9/19/2007	Indefinite	54.13	2000 NDS		167
TULSA COUNTY JAIL, OK	IGSA	X	3/24/2010	3/24/2015	72.25	Unclear PBNDIS	SAAPI	195
UTAH COUNTY JAIL, UT	IGSA	X	12/20/1991	Indefinite	74.54	2011 PBNDIS		100
WAKULLA COUNTY JAIL, FL	IGSA	X	Redacted	9/8/2013	87.11	2000 NDS	SAAPI	184
WORCESTER COUNTY JAIL, MD	IGSA	X		N/A	59.71	2000 NDS	SAAPI	828
YORK COUNTY PRISON, PA	Amendments	X			75.16			226
YUBA COUNTY JAIL, CA	IGSA	X	12/15/2008	12/14/2018	75.16	2000 NDS	SAAPI	30648
							Total ADP:	

*ADP= Average Daily Population (some data obtained from FY 2011 and FY 2012 ICE inspection reports, forthcoming in late 2015)