Immigration Detention Transparency & Human Rights Project October 2015 Report



## The 1-2-3s of the "324":

## The Life of an Immigration Detention Inspection Form

The information in this chart is based on the January 2014 deposition in *NIJC v. Department of Homeland Security* of the head of the U.S. Immigration and Customs Enforcement (ICE) Detention Monitoring Unit. Transcript is available at: www.documentcloud.org/documents/2105816-neveleffs-deposition.html



The reviewers who perform the inspection are employees of The Nakamoto Group, a Maryland-based government management contractor.

1. Reviewers with subject-matter expertise visit a facility and complete their sections of the inspections checklist, known as Form G-324A



2. Reviewers meet with the Lead Compliance Inspector (LCI) or Reviewer-in-Charge (RIC) to generate a complete 324 form



4. Nakamoto sends the form to ICE's Detention Monitoring Unit

This office is responsible for the "day-to-day" monitoring of detention standards.

5. The form continues on to the Contract Technical Representative at ICE's Detention Standards Compliance Unit (DSCU)

If the facility requires a Uniform Corrective Action Plan (also refered to as"Plan of Action"), the DSCU reviews the 324 for deficient ratings and comunicates with reviewers to determine a final rating. 3. The LCI or RIC pass the inspection form on to the "Nakamoto operations team" where it "gets packaged."

Nakamoto does not inform ICE whether changes are made to the form between the time of the inspection and when the 324 is delivered to ICE.

6. The DSCU communicates the final rating to the Assistant Director or Deputy Assistant Director for Detention Management, who signs off as "Review Authority" in a memo that is sent to the ICE Enforcement and Removal Operations (ERO) Field Office responsible for the facility.

The 324 also is uploaded to ICE's SharePoint document management system, filed in paper form at ICE's ERO office in Washington, D.C., and sent to government management contractor Cappemini, which enters the inspection results into ICE's Facility Management Program System.