

VILLAGE OF CRETE

524 WEST EXCHANGE STREET • P.O. BOX 337 • CRETE, ILLINOIS 60417

708/672-5431 FAX: 708/672-3920

www.villageofcrete.org

VILLAGE PRESIDENT
MICHAEL S. EINHORN

VILLAGE CLERK
DEBORAH S. BACHERT

VILLAGE ADMINISTRATOR
THOMAS J. DURKIN, AICP

November 15, 2010

Mr. Gary E. Mead, Assistant Director
Detention Management Division
Immigration and Customs Enforcement
U.S. Department of Homeland Security
500 12th Street, S.W.
Washington, DC 20024



Dear Mr. Mead:

On behalf of the Village of Crete, Illinois, please accept this letter as notification of our interest in participating in a **due diligence process** for entering into an Interagency Agreement to provide a facility for Immigration and Customs Enforcement in the Chicago Metropolitan Area. We understand that a Statement of Objectives has been circulated and we would like the opportunity to possibly submit a proposal for ICE's consideration at the appropriate time. The Village of Crete would partner with a firm such as Corrections Corporation of America (CCA) to provide the requested facility and detention services. Please find the attached White Paper in response to Immigration and Customs Enforcement's request for a concept proposal for the Chicago area.

Thank you for your time and please keep me apprised of the next steps in the process. As I've mentioned, the Village is interested in participating in this process and can move very quickly to meet the needs of your agency.

Should you have any questions or need any additional information at this time, please contact me at 708-672-5479 or via email at tdurkin@villageofcrete.org.

Sincerely,


Thomas J. Durkin, AICP
Village Administrator

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IMMIGRATION DETENTION REFORM

**A White Paper
Presented by the
Village of Crete, Illinois &**



**In Response to
Immigration and Customs Enforcement Request
for
Inter-Governmental Service Agreement (IGSA)
Concept Proposal: Chicago**

November 15, 2010

**Crete, Illinois/CCA White Paper
Presented to Immigration and Customs Enforcement for
Chicago IGSA for a Diverse Detainee Population**

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Immigration Detention Reform

Chicago IGSA Proposal for a Diverse Detainee Population

A. Introduction

A key goal of Immigration Detention Reform is to create a civil detention system that is not penal in nature. However, ICE recognizes that some detainees may have a criminal history. Consequently, detainees at the medium and maximum classification levels may require housing in a more secure area of the facility. The new system will provide safe and secure conditions of confinement based on the individual characteristics of a diverse population including: threat to the community, risk of flight, type and status of immigration proceeding, community ties, medical and mental health issues. Accordingly, ICE requires a wholly new generation of detention facilities uniquely suited to ICE's civil detention authority. The new facilities must feature innovative and cost-effective designs and new approaches to construction materials, staffing, and operations. They must also provide easy access to legal services, abundant natural light, ample outdoor recreation, contact visitation, noise control, freedom of movement, programming opportunities consistent with detainee demographics, and state-of-the art medical facilities.

This statement of objectives (SOO) reflects the need to acquire detention services from an IGSA partner in a supervised facility that is safe and secure, prevents unauthorized entry and egress and provides appropriate custody and care to the ICE detention population specified below in Section B, Facility Overview. In response to this SOO, interested IGSA holders should submit a written concept proposal or white paper to the Cognizant Contracting Officer and local ERO Field Office Director (FOD) on or before September 30, 2010, that provides an overview of the offer's proposed facility and demonstrates how operation of that facility correlates to the ICE detention concept described below. An estimated per diem rate and estimated delivery time should also be included.

The Government cannot guarantee that an award will be from these submissions.

The Village of Crete, Illinois proposes to partner with CCA, America's Leader in Partnership Corrections, to provide a new generation detention facility to meet the requirements of this SOO. The proposed facility would be built on property to be acquired by CCA in Crete, Illinois [REDACTED]

Crete Village has turned to CCA as a partner because of CCA's 27-year partnership with ICE. During this time CCA has continuously grown with the changing demands placed on ICE, and as a result of this long-term partnership, CCA is keenly aware of ICE's intentions with respect to the required new generation of detention facilities that are safe and secure, prevent unauthorized entry and egress and provide appropriate custody and care to the ICE detention population. The Crete Village/CCA team has incorporated this insight into our response to best meet ICE's stated need.

B. Facility Overview

ICE requires approximately 700 new detention beds to meet local demand in the Chicago metropolitan area. Ideally, this demand would be met by one 500 bed facility, with the capacity to expand to 700 beds.

The desired services can be provided in a dedicated multi-purpose facility or multi-facility campus with both secure (medium and maximum security cases) and non-secure residential (low and minimum security cases) beds that is designed and operated to process and house adult detainees, including the full range of criminal and non-criminal cases, in a manner consistent with ICE's recently announced civil detention reform initiatives.

Eighty (80) percent of capacity should be secure beds, and 20 percent of capacity should be non-secure beds. The facility or campus must have the ability to separately house male and female detainees of all ICE security classifications levels in accordance with the ICE Performance Based National Detention Standards (PBNDS) and may be called upon to house families on a temporary or longer-term basis in accordance with the ICE Family Residential Standards (FRS). Bed space for the housing of families may be included as part of the bed space expansion capability.

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The Crete Village/CCA team has reviewed the stated requirements and would propose a facility with the following bed allotments.

The ideal multi-purpose facility or multi-facility campus will have or offer the following:

Facility Exterior/Design:

- Innovative designs, materials, and technology that, where possible and practical, combine the use of innovative soft construction techniques with traditional "brick and mortar" penal structures, which will reduce construction and operating costs while promoting the least restrictive detention environments appropriate to the population.

Based on CCA's many years of experience designing, building and managing detention facilities and experience gained in converting the T. Don Hutto facility into a family residential center, the Crete Village/CCA team would propose to combine the use of innovative soft construction techniques with conventional facility construction to meet the requirements of the SOO. The facility would be designed to reduce construction and operation costs and to provide the least restrictive environment appropriate to the detention population.

- An environmentally sustainable design and operation that is certifiable through the Leadership in Energy and Environmental Design (LEED) process.

The proposed facility would be LEED certifiable.

- Possible co-location with an existing detention facility that can provide or at least augment support services, such as: food, maintenance, laundry, utilities, and dental/medical/mental health as a way of minimizing construction costs, build-out time, and operational expenses.

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CCA has no existing detention facility at or near the proposed site.

- Infrastructure capability and flexibility to expand or contract bed space capacity as ICE detention demographics and population numbers fluctuate and shift (over the long-term).

The design of the proposed facility would provide the flexibility necessary to expand or contract bed space capacity as population demographics and numbers fluctuate and shift over time.

- Appropriately sized and staffed dental, medical, and mental health facilities. The IGSA will arrange for a health services provider or may request ICE'S Division of Immigration Health Services (DIHS) to staff and operate the medical unit.

[REDACTED] Detainees would have access to medical clinic services, mental health services and dental health services all with easy access in one central location. Space would be provided for adequate staff offices, exam rooms, diagnostics, pharmacy and optometry.

- Facilities, including courtrooms, for the Executive Office for Immigration Review (EOIR) and ICE staff and video-conferencing capability.

The Crete Village/CCA team would provide facilities, including courtrooms, for EOIR and ICE staff, including a dedicated telephone system solely for ICE and EOIR administrative use. Video conferencing would also be provided for ICE/EOIR staff and for court activities. CCA provides various video conferencing devices in its operating facilities and has experience with these applications including arraignments and other court hearings, visitation, telemedicine, administrative and other conferencing. Additionally, CCA has experience in bringing up full service processing centers in facilities including the Stewart Detention Facility, North Georgia Detention Center and the T. Don Hutto Residential Center which provide services to ICE.

[REDACTED]

Each video conferencing project requires full project management for the many tasks, stakeholders, resources, and scheduled action items. CCA's Program Management Office would meet with representatives from ICE to determine needed equipment, connectivity methodology and a detailed plan of action outlining all the roles and responsibilities, issues, risks and project budget. Working with an ICE assigned project representative; CCA's project manager would ensure timely and correct execution of the project plan. Regular project meetings would occur for both parties' management teams, with CCA's Chief Information Officer serving as the Crete Village/CCA team's overall project sponsor.

- Multiple Closed Circuit Television (CCTV) cameras and other appropriate electronic security equipment throughout the campus or facility, including all entry and exits points, all housing units, and all areas where detainees are authorized to move and congregate.

CCTV cameras and other appropriate electronic security equipment would be provided throughout the facility, including all entry and exit points, all housing units and all areas where detainees are authorized to move and congregate.

Facility Interior/Operations:

- Natural/ambient light throughout the facility.

The facility design would feature natural light by the use of skylights located throughout the facility. Additionally, all detainee bedrooms in the adult residential section of the facility would contain windows appropriately sized for the room.

- Indoor and outdoor community areas with durable, fire-resistant, non-institutional seating and furniture, and softer interior settings throughout the facility.

The medium/maximum security areas will have institution appropriate seating and furniture and secure interior settings. The adult residential section of the facility would be comprised of four-person bedrooms organized around a large common space. Each [REDACTED] a shared kitchenette, staff offices, private showers, and restroom areas. Each bedroom would provide a normative residential environment with non-institutional furniture and finishes. [REDACTED] providing the durability of steel with a "soft look." Each room would have a [REDACTED] The large common area would provide non-institutional seating areas for TV viewing, game playing and general relaxation. The space would be flooded with daylight from several skylights. [REDACTED]

- Enhanced but controlled freedom of detainee movement. Freedom of movement will be applicable to all ICE classification levels, although the manner and degree of implementation may vary based on security levels.

The Crete Village/CCA team would establish an environment that allows detainee movement appropriate to the security needs of the detainee population.

The design and décor of the adult residential section of the facility would create a casual atmosphere that does not deter authorized movement. Operational procedures would provide the necessary structure to ensure safe, civilized behavior such as is desired in any township or community, but would not prevent movement during most periods of the day and evening. Detainees would be allowed to wake and turn in for the evening at their own discretion. Sufficient numbers of secure, but non-detention looking gates and doors would be provided throughout the facility to provide immediate containment if an emergency situation arose.

- Enhanced indoor and outdoor recreational activities, with extended hours. Ideally, a minimum of four hours per day of outdoor recreation should be provided in a natural setting that allows for vigorous aerobic exercise.

Both the medium/maximum security and adult residential sections of the facility would provide areas for detainees to exercise and engage in recreational activities such as basketball and volleyball. Outdoor recreation fields would be utilized for soccer, softball, volleyball, etc. These spaces would accommodate indoor and outdoor recreational activities, with extended hours, and outdoor recreation that allows for exercise in a natural environment. All detainees participating in outdoor recreation would have access to drinking water and toilet facilities.

Recreational opportunities may include activities such as the following:

- Indoor in-pod activities:
 - Television and videos
 - Board games (e.g. chess, dominoes, playing cards, checkers, etc.)
 - Radio
- Indoor recreation activities:
 - Table tennis
 - Basketball
 - Handball
 - Fitness equipment
 - Aerobics
 - Access to magazines and books
 - Library

- Outdoor recreation activities:
 - Volleyball
 - Softball
 - Soccer
 - Horseshoes
 - Badminton
 - Tetherball
 - Walking rack

Outside activities may also include scheduled tournaments coordinated by the Recreation Supervisor. Community resources also may be used to assist with recreational activities at the facility.

A recreation schedule would be posted in the housing units. Additionally, specialized events such as tournaments or community volunteer activities would also be posted.

- Enhanced programming, including religious services and social programs, as appropriate for the population demographics and average length of stay.

Detainees would have the opportunity to participate in numerous services including a reading library. Social programming would be provided that is appropriate for the population demographics and average length of stay. In addition, a multi-denominational meeting area would be available to accommodate religious needs.

- Enhanced law library and legal resources.

A legal library would be provided and would include current and complete legal reference materials in accordance with ICE recommendations.

- Dedicated space for religious services.

The facility would provide a Chaplain to plan, direct and coordinate religious programs and adequate space and equipment to conduct such programs. Detainees of different religious beliefs would be provided reasonable and equitable opportunities to participate in the practices of their respective faiths. These opportunities would exist for all equally, regardless of the number of practitioners of a given religion, whether the religion is "mainstream," whether the religion is "Western" or "Eastern," or other such factors. Opportunities would be constrained only by concerns about safety, security, the orderly operation of the facility or extraordinary costs associated with a specific practice. Religious activities would be open to the entire detainee population, without discrimination based on race, religion, national origin, gender, sexual orientation or disability. Current program schedules would be posted in all housing units and on detainee bulletin boards. In scheduling approved religious activities, the Chaplain would consider both the availability of staff supervision and the need to allot time and space equitably among the different groups.

- Emphasis on communal areas and social interactions consistent with security levels.

The design of the facility would provide for communal areas which would accommodate social interactions among the staff and detainees commensurate with the security requirements of the detainees.

- Contact visitation, including arrangements for visiting families, with extended hours. This will be applicable to all ICE classification levels, although the manner of implementation may vary based on security levels. Where practicable, visitation should include visitation both day and evening hours, seven days a week.

Detainees would have access to a contact visiting area. This space would provide ample natural light as well as non-correctional furnishings.

The facility would schedule hours of visitation taking into account the visitation requirements of family (including minors), friends, legal representatives, consular officials, and interested nongovernmental organizations. The facility's visiting area would be appropriately furnished and arranged to be as comfortable as practicable. The Warden would ensure that adequate supervision of the visiting room is provided and may temporarily restrict visiting when necessary to ensure the security and good order of the facility.

Notification of visitation rules and hours will be documented in the Detainee Handbook and distributed to each detainee. Rules and hours also would be posted in each housing unit and in the visitors' waiting area.

Visits would be permitted during set hours seven (7) days a week. Staff would verify each visitor's identity before allowing admittance to the facility. No adult visitor would be admitted without positive identification, such as a driver's license or other government issued photo identification. Visitors would be escorted to the visiting room only after completing identification and inspection as provided in the facility's written procedures. All visitors would be subject to metal detector clearance as well as a visual inspection of purses, briefcases, packages and other containers.

The facility would promote the use of onsite visitor lockers or other secure areas for safekeeping of personal belongings during visits.

- Private areas for attorney-client contact visitation, video teleconferencing capability, and innovative solutions for visitation, including virtual visitation, from remote areas for attorneys and families unable to travel to the facility.

Private attorney/client visit space would be provided so detainees may have meetings with legal representatives in a secure, discrete and confidential manner. Detainees would be notified of the rules and hours for legal visitation. This information would also be prominently posted in waiting areas and visiting areas for general and legal visitors, and in the recreation area and housing units for detainees. Should a legal visit proceed through a scheduled meal period, the detainee would receive a tray or sack meal after the visit.

Subject to the restrictions stated below, individuals in the following categories may visit detainees to discuss legal matters. Prior to each visit, all legal service providers would be required to provide identification.

- Attorneys;
- Legal Assistants - An unaccompanied legal assistant may meet with a detainee during legal visitation hours upon presentation of a letter of authorization from the attorney under whose supervision he/she is working. The letter must state that the named legal assistant is working on behalf of the supervising attorney for purposes of meeting with the ICE detainee(s); and
- Interpreters - Interpreters would be permitted to accompany attorneys and legal assistants on legal visits.

Visits between legal service providers and detainees are confidential and would not be subject to auditory supervision. Private full contact consultation rooms would be available for such meetings. Staff would not be present in the confidential area during the attorney/client meeting unless the attorney requests the presence of an officer. However, officers may observe such meetings visually through a window or camera to the extent necessary to maintain security, as long as the officer cannot overhear the conversation.

The facility's written legal visitation procedures would provide for the exchange of documents between detainees and legal representatives. Documents or other written material provided to a detainee during a visit with a legal representative will be inspected, but not read. Detainees would be permitted to retain legal material received.

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The facility's written legal visitation policy would be posted in all common areas and housing units and available upon request.

- Private showers and restrooms, where practicable and appropriate based on security levels.

Private showers and restrooms would be provided in the adult residential section of the facility where practicable and appropriate. Traditional institutional showers and restrooms would be provided in the medium/maximum security area of the facility.

- Cafeteria-style meal service with menu options. (Satellite feeding of detainees in certain secure areas or limited circumstances may be required, but should be limited).

The Crete Village/CCA team would offer a cafeteria-style setting which offers multiple food choices. Food would be ethnically based yet easily adaptable to detainee demographics.

- Non-institutional detainee clothing and staff uniforms.

The Crete Village/CCA team would dress employees in less institutional style uniforms. Detainees in the adult residential section of the facility will dress informally. Furnished clothing would include similarly styled attire as found among the detainees prior to their detention. Two-piece outfits, shirts and pants, would be of a certain style and color to differentiate a detainee from a staff member, but would not give the appearance of a uniform. Appropriate undergarments and shoes would be provided.

- A high-degree of facility staff-detainee interaction in order to address detainee grievances, housing issues and facility concerns.

To make certain that the facility maintains a relaxed environment, staff would serve as a support system providing assistance to the detainees. Staff would be instructed to behave in a manner that promotes less formality since the facility would enact fewer rules than is typical of a correctional facility. Staff would be available to answer questions, give direction and encourage morale. Staff also would ensure that ICE rules are properly enforced.

C. Facility Location:

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The ideal facility location will:

- Be within a ninety-minute drive of the Chicago Field Office.

As indicated on the attached map the proposed site is an approximately 42 minute (36.3 miles) drive from the Chicago Field Office.

- Serve as a transportation hub for picking up and dropping off ICE detainees within an 8 hour one way drive time from the facility.

The proposed site's proximity to major population centers would make it an ideal site for a transportation hub.

- Be within an approximate 30-minute surface commute time of a general acute care hospital that has an emergency room, surgery, medical, and mental health services and within an approximate 90-minute surface commute time of an ICE/DRO Air Operations Unit-approved airport.

As indicated on the attached map at least nine (9) hospitals are within a 30-minute drive of the proposed site. Four (4) major airports are within an hour's drive of the site: Gary/Chicago International Airport (32 minutes, 27.0 miles), Chicago-Midway International Airport (46 minutes, 35.0 miles), Chicago O'Hare International Airport (59 minutes, 52.2 miles) and Clow International Airport (58 minutes, 50.8 miles).

- Have access to public and commercial transportation routes and services.

As indicated on the attached map the proposed site is conveniently located to major highways and Greyhound Bus and Amtrack rail services.

- Have access to local consulates and pro-bono legal services.

The facility would promptly and prominently post in resident housing units, the law library and other appropriate areas any official list of pro bono legal organizations provided by the Executive Office for Immigration Review.

The Warden would ensure that all detainees are notified of and afforded the right to contact and receive visits from their consular officers. The same hours, privacy and conditions that govern legal visiting would apply to consular visiting. With the Warden's prior authorization, consular visits may be permitted at additional times. Consular officers would be required to present Department of State identification.

D. Performance Outcomes

Expected Outcomes may be viewed at the following three links:

Performance-Based National Detention Standards (PBNDS)

The more restrictive, secure areas will be governed by the optimal performance levels articulated in the ICE PBNDS 2008 (currently in existence) or 2010 (pending approval), available at the following website: [http://www.ice.gov/partners/dro/PBNDS 2010/index.htm](http://www.ice.gov/partners/dro/PBNDS%2010/index.htm).

Adult Residential Standards (ARS)

The non-secure residential areas will be governed by the performance levels articulated in the ICE Adult Residential Standards available at the following website: <http://www.ice.gov/partners/dro/ARS2010/index.htm>. The ARS are currently under development.

Family Residential Standards (FRS)

Should it be necessary to detain families at the facility, their environment will be governed by the ICE Family Residential Standards available at the following website: <http://www.ice.gov/pi/familyresidential/index.htm>.

As stated previously, CCA has partnered with ICE (and INS) for over 27 years. Currently, CCA houses approximately 6,500 ICE male and female detainees of varying security levels at facilities throughout the U.S. Further, CCA has the unique experience of having worked closely with ICE to address the challenges of providing family detention at the T. Don Hutto Residential Center.

As a result of CCA's unique qualifications in managing ICE populations and Crete's ideal location and willingness to engage a partner to manage a facility, the Crete Village/CCA team is ideally suited to meet ICE's stated need in this area.

Per Diem Range:		
Delivery Time:		It is estimated that design and construction of the facility would be completed [REDACTED] following contract award.