



June 14, 2018

TO: [REDACTED]
Assistant Director for Detention Management

FROM: [REDACTED]
Lead Compliance Inspector
The Nakamoto Group, Inc.

SUBJECT: **Annual Detention Inspection of the Plymouth County Correctional Facility**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS Over 72 Hours) of the Plymouth County Correctional Facility in Plymouth, MA during the period of June 12-14, 2018. This is an IGSA facility.

The inspection was performed under the guidance of [REDACTED], Lead Compliance Inspector. Team Members were:

Subject Matter Field	Team Member
Detainee Rights	[REDACTED]
Security	[REDACTED]
Medical Care	[REDACTED]
Medical Care	[REDACTED]
Safety	[REDACTED]

Type of Inspection

This is a scheduled annual inspection, which is performed to determine overall compliance with the ICE NDS for Over 72 hour facilities. The facility received a previous rating of Acceptable during the June 2017 inspection.

Inspection Summary

The Plymouth County Correctional Facility is currently accredited by:

- The American Correctional Association (ACA) - Yes
- The National Commission on Correctional Health Care (NCCHC) - No
- The Joint Commission (TJC) - No
- Prison Rape Elimination Act (PREA) - Yes

Standards Compliance

The following information is a summary of the standards that were reviewed and overall compliance that was determined as a result of the 2017 and 2018 annual inspections:



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2017 Annual Inspection	
Acceptable	37
Deficient	0
At Risk	0
Repeat Deficiency	0
Not Applicable	2

2018 Annual Inspection	
Acceptable	37
Deficient	0
At Risk	0
Repeat Deficiency	0
Not Applicable	2

The inspection team identified three (3) deficient components in the following three (3) standards:

Correspondence and Other Mail- 1, which is a repeat deficiency
Issue and Exchange of Clothing, Bedding, and Towels- 1
Environmental Health and Safety- 1, which is a repeat deficiency

Facility Snapshot/Description

The Plymouth County Correctional Facility (PCCF) is owned by the Commonwealth of Massachusetts and operated by the Plymouth County Sheriff's Department. The facility is located in the southern portion of Plymouth, MA, in an area populated with government buildings. PCCF houses [REDACTED]

The Plymouth County Correctional Facility is a multi-level structure, managed under the direct supervision model. All ICE detainee housing units are situated on the same level and consist of two-person and five-person cells. ICE detainees are housed and recreate separately from other detainees. The two-tiered cell blocks housing ICE detainees have large open dayroom spaces and attached outdoor recreation areas. Detainees traverse freely between the dayroom and outdoor recreation area during waking hours, with the exception that the outdoor recreation area closes at dusk. There is also a large gymnasium that is offered to ICE detainees twice per week for recreation. The entire facility is climate controlled.

The inspection team found the atmosphere to be calm with no obvious indicators of high stress levels. Sanitation was above average and noise levels were acceptable. Staff exhibited a professional appearance and demeanor, and those facility employees whose regular duties involved ICE detainees demonstrated a knowledge of the Standards. A number of employees are bilingual, and the language line is readily available. Observed interactions between staff and detainees were respectful and professional. Detainees approached the ICE Officer, facility staff, and the inspection team freely. The assigned ICE Officer was observed interviewing ICE detainees, and it was obvious that they were familiar with the Officer and comfortable talking with him. Detainees were observed exercising in the recreation yards, playing games in the dayrooms, and watching television.

The inspection team conducted eighteen formal interviews and no less than fifty informal interviews. Several detainees complained that they did not like the food and the menu selection. The Safety SME confirmed that the menu contained a satisfactory variety of ethnic foods, and that the menu was approved by a dietician. Several detainees stated that the meal servings were too small. The Safety SME determined that the serving sizes were appropriate according to the nutritional analysis. One detainee claimed that he was not receiving medical care and that his grievances went unanswered. The Medical SME checked the medical record and reported that the detainee was receiving regular care but, according to the medical staff, he did not accept the conclusions of the doctor. The Safety SME reviewed the grievance file and the detainee had filed two grievances, both of



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which were responded to in a timely fashion. Confidential and LEP detainee interviews revealed no safety concerns and no issues obtaining services. Several detainees stated that the facility staff is helpful and friendly.

There is no medical co-payment for ICE detainees. The doctor, dentist, and mental health staff are contract employees. Food service operations are contracted with the Trinity Services Group. All other staff are Plymouth County employees.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Acceptable. The facility complies with the ICE National Detention Standards (NDS) for Over 72 hour facilities. No (0) standards were found Deficient and two (2) standards were Not Applicable (N/A). All remaining thirty-seven (37) standards were found to be in compliance.

LCI Assurance Statement

The findings of compliance and non-compliance are accurately and completely documented on the G-324 Inspection Form and are supported by documentation in the inspection file. An out brief was conducted at the facility and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials – [REDACTED]
- Facility Staff – [REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector

June 14, 2018

Printed Name of LCI

Date