

October 18, 2019

TO: [REDACTED]  
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the York County Prison**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2008; 2011 SAAP and Significant Self Harm and Suicide Prevention and Intervention) of the York County Prison in York, Pennsylvania during the period of October 16-18, 2019. 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 PBNDS 2008 for Over 72 hour facilities. The facility received a previous rating of Meets Standards during the October 2018 annual inspection.

### **Inspection Summary**

The York County Prison is currently accredited by:

- The American Correctional Association (ACA) - No
- The National Commission on Correctional Health Care (NCCHC) - Yes
- 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 2018 and the 2019 annual inspections:

<b>2018 Annual Inspection</b>	
Meets Standard	39
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	2

<b>2019 Annual Inspection</b>	
Meets Standard	40
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	1

The inspection team identified six (6) deficient components in the following two (2) standards:

- Searches of Detainees - 1
- Food Service - 5, one of which is a Priority component

### **Facility Snapshot/Description**

The York County Prison, located in York, Pennsylvania, is owned by York County and operated by the York County Prison Board. Originally constructed in 1979, the York County Prison has undergone renovations and new construction throughout the last four decades. All custody levels of adult male and female detainees for ICE, York County, and the Pennsylvania Department of Corrections are housed at the facility.

The facility is one large building connected by multiple corridors and managed as five operational zones. It has over 550,000 square feet under one roof and measures in excess of one-quarter mile from end to end. The perimeter is comprised of exterior building walls and twelve-foot chain link fencing enhanced with razor ribbon. There are four lobby entrances and exits and an additional four secured ingress/egress doors. The compound is surrounded by a partially paved road and a walking path which is patrolled by an armed officer at least once per shift. Monitored camera surveillance extends around the entire perimeter and all areas of the interior of the facility. The facility has 54 general population housing pods with capacities ranging from sixteen to 64 beds. Both cell and dormitory style beds are available. Indoor and outdoor recreation is available seven days per week for at least one hour each day. Housing units provide adequate open dayroom space for their capacity. Detainees spend their waking hours socializing in the dayrooms or moving freely between the dayroom and their room/bunk. The general population housing units receive indirect supervision from roving officers. ICE detainees commingle with non-ICE detainees of similar custody designations. Each housing unit is equipped with tables and seats, televisions, telephones, and board games. The dormitory pods housing general population male detainees contain two computers equipped with LexisNexis. Detainees may also check out a tablet on which at no charge they can communicate with various facility staff and ICE; and for a fee download music and videos. General non-contact on-site visitation is supplemented by optional video visitation. The atmosphere during the inspection was calm and detainees were observed freely interacting with staff and other detainees.

The inspection team observed the housing units and common areas of the facility during the inspection; cleanliness and sanitation were observed to be average. Numerous detainees were interviewed; some interviews were in housing pods with individuals or small groups of detainees and several were private and confidential and included detainees with limited English proficiency (LEP). A bilingual member of the inspection team interviewed several Spanish speaking detainees. Language line was used to facilitate interviews with detainees who spoke neither English nor Spanish. Interviews included detainees who had recently arrived at the facility and some who had been housed at the facility for longer periods of time. Both male and female detainees were interviewed. The detainees voiced no life-safety concerns.

Several detainees complained about the lack of fresh fruit as well as quality and quantity of food provided. The Safety SME reviewed the nutritional analysis which indicates that the menus meet the Recommended Dietary Allowance (RDA). Observations of the preparation of satellite food trays supported conformity to the nutritionally approved menus. Quality of food was observed to be in accordance with industry standards. Canned fruit is regularly served in lieu of fresh fruit.

Three detainees voiced concerns regarding medical issues. The Medical SME reviewed the medical files of each of these detainees and found they had been seen by a medical provider and received appropriate treatment and follow-up.

Detainee telephone services are provided by GTL. Commissary services are provided via a contract with Keefe Group. Medical services are provided via a contract with PrimeCare Medical, Inc. All other services are provided by York County.

ICE detainees do not incur medical co-pays.

### **Areas of Concern/Significant Observations**

#### **Priority Component Rated Does Not Meet Standard**

##### **Food Service**

**Component #10** - Before and during the display, service and transportation of food, sanitary guidelines are observed, with hot foods maintained at a temperature of at least 140 F degrees (120 degrees in food trays) and foods that require refrigeration maintained at 41 F degrees or below.

**Finding:** On October 16, 2019, food temperatures of hot foods and foods that require refrigeration were taken in the food service department prior to placement of the food on food trays. Carrots registered 129 degrees Fahrenheit and hotdogs 125 degrees Fahrenheit instead of the 140 degrees Fahrenheit required by the standard. The temperature of milk in the cartons was 55 degrees Fahrenheit instead of the required 41 degrees Fahrenheit. On October 17, 2019, the temperature of milk again registered at 55 degrees Fahrenheit.

**Recommendation:** Ensure temperatures are taken regularly and hot foods are maintained at a temperature of at least 140 degrees Fahrenheit (120 degrees Fahrenheit in food trays) and foods that require refrigeration are maintained at 41 degrees Fahrenheit or below.

##### **Recommended Rating and Justification**

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards. The facility complies with the ICE Performance-Based National Detention Standards 2008 and 2011 SAAPI and Significant Self-Harm and Suicide Prevention and Intervention. No (0) standards were found Does Not Meet Standard and one (1) standard was Not Applicable (N/A). All remaining forty (40) 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	October 18, 2019
Printed Name of LCI	Date