

February 10, 2021

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Biennial Detention Inspection of the Morrow County Correctional Facility**

The Nakamoto Group, Inc. performed a remote biennial inspection for compliance with the ICE National Detention Standards (NDS 2019 Over-72 Hours) of the Morrow County Correctional Facility in Mount Gilead, Ohio during the period of February 8-10, 2021. This is an IGSA facility.

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

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

Type of Inspection

This is a scheduled biennial inspection, which is performed to determine overall compliance with the ICE NDS 2019 for Over 72-hour facilities. The facility was not inspected in 2019 or 2020. The October 2020 inspection was canceled.

Inspection Summary

The Morrow County Correctional Facility is currently accredited by:

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

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 2021 NDS 2019 biennial compliance inspection. The facility did not undergo a biennial inspection in 2019.



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| 2019 Biennial Inspection | | 2021 Biennial Inspection | |
|--------------------------|-----|--------------------------|----|
| Meets Standards | N/A | Meets Standards | 29 |
| Does Not Meet Standards | N/A | Does Not Meet Standards | 1 |
| Repeat Deficiency | N/A | Repeat Deficiency | 0 |
| Not Applicable | N/A | Not Applicable | 3 |

The inspection team identified thirty (30) deficient components in the following thirteen (13) standards:

- Environmental Health and Safety- 2
- Admission and Release – 1
- Custody Classification – 1
- Facility Security and Control – 5
- Hold Rooms in Detention Facilities – 1
- Post Orders – 5
- Use of Force and Restraints – 7
- Special Management Units – 3
- Sexual Abuse and Assault Prevention - 1
- Food Service- 1
- Correspondence and Other Mail- 1
- Recreation - 1
- Detainee Handbook - 1

Facility Snapshot/Description

The Morrow County Correctional Facility is owned and funded by the Morrow County, Ohio government and operated by the Morrow County Sheriff. The facility is located on the outskirts of Mount Gilead, Ohio. The facility houses adult male and female ICE detainees of all security levels, as well as, detainees from Morrow County and surrounding Ohio counties. [REDACTED]

According to the corporal, the facility is managed under both direct and indirect supervision models. Direct supervision is provided in the dormitories. Monitoring is assisted by video cameras by control room officers. ICE detainees are housed primarily in the dormitories, although those with behavior problems, or the occasional higher security detainee, may be housed in the cellblocks. During the inspection, the three ICE detainees were housed in the dormitory. ICE detainees are housed with non-ICE detainees of similar classification levels. Video cameras are present in the recreation areas and other areas around the facility.

The inspection team attempted to interview all three detainees. However, only one detainee volunteered to be interviewed. The detainee stated that he felt safe and made no allegations regarding discrimination, abuse, or conditions of confinement.

Photo images and video confirmed that housing areas provide adequate open space. Each unit has a television viewing area, telephone banks, table games, and kiosks. The kiosk system provides an “email to staff” function, commissary ordering, and video visitation option. Detainees



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are provided one free thirty-minute call/video visit per week. Detainees are afforded at least five days per week of outdoor recreation, weather permitting.

Food services are provided by Aramark. All other services are provided by Morrow County employees. Detainees are not required to pay a co-pay for medical or mental health services.

Areas of Concern/Significant Observations

The inspection was conducted remotely and inspectors were unable to personally observe practices and procedures within the facility. The inspection team relied upon photographs and/or videos to validate the observation of many standards.

Post Orders Standard was found Does Not Meet Standards.

Standard requirements: The facility provides officers all necessary guidance for carrying out their duties. This guidance includes the post orders established for every post, which are reviewed at least annually, and given to each officer upon assignment to that post.

Findings: Post orders were not made available to the inspector during the inspection. Therefore, the inspector could not determine that post orders are kept current at all times; post orders are reviewed and updated annually; post orders for posts that control access to the institution perimeter include that any staff member who is taken hostage is considered to be under duress; a master file which contains all post orders is available to all employees; the facility has written procedures to ensure that all officers read applicable post orders, and the facility administrator or designee reviews and signs housing unit orders.

Recommendation: Ensure that post orders are available to all staff and include a systematic review and authorization process.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards unless unobserved practices and conditions are contrary to what was reported to the inspection team. The facility complies with the ICE National Detention Standards (NDS 2019). One (1) standard was found Does Not Meet and three (3) standards were Not Applicable (N/A). All remaining twenty-nine (29) standards were found to Meet Standards.

LCI Assurance Statement

The findings of Meets and Does Not Meet are accurately and completely documented on the G-324A Inspection Form and are supported by documentation in the inspection file. An out brief was conducted via conference call and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following participated:

- ICE Officials – [REDACTED]

- Facility Staff – [REDACTED]
[REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector February 10, 2021

Printed Name of LCI

Date