

April 18, 2019

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Orange County Jail**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS) and SAAPI (PBNDS 2011) of the Orange County Jail in Goshen, NY during the period of April 16-18, 2019. This is an IGSA facility.

The annual inspection was performed under the guidance of [REDACTED], 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 annual inspection, which is performed to determine overall compliance with the ICE NDS for Over 72 hour facilities. The facility received a rating of Acceptable during the April 2018 annual inspection.

Inspection Summary

The Orange County Jail is currently accredited by:

- The American Correctional Association (ACA) – Yes
- 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 2019 NDS compliance annual inspections.



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2018 Inspection		2019 Inspection	
Acceptable	38	Acceptable	37
Deficient	0	Deficient	0
At-Risk	0	At-Risk	0
Repeat Finding	0	Repeat Finding	0
Not Applicable	1	Not Applicable	2

The inspection team identified five (5) deficient components in the following five (5) standards:

- Detainee Handbook- 1
- Funds and Personal Property- 1
- Detainee Grievance Process- 1
- Suicide Prevention and Intervention- 1
- Use of Force- 1

Facility Snapshot/Description

The Orange County Jail is under the jurisdiction of the Orange County Sheriff's Office and is located in the rural western outskirts of the village of Goshen, NY. [REDACTED]

[REDACTED] The direct supervision, single-story structure is encircled by two twelve-foot chain link perimeter fences supplemented with razor ribbon. There is a paved perimeter road around most of the compound that is patrolled by an armed officer 24 hours a day. There are over 300 surveillance cameras which provide visual observation of the critical movement and common areas inside the facility. [REDACTED]

The facility has eighteen general population housing units. Fifteen living units are cell blocks and three are dormitories. ICE detainees populate three of the cellblocks and one dormitory. Male ICE detainees are housed separately from other detainees; female ICE detainees are comingled with other detainees of like security levels. The day rooms are furnished with a television, telephones, and tables for eating and recreating. Each detainee has a personal property storage area/locker. Each general population housing unit has direct access to an outdoor recreation area which is available seven days a week during waking hours. There is also a two-level special management unit with 28 single cells and a separate outdoor recreation area. The facility is well maintained and it is obvious that sanitation is a daily priority.

Detainees spend the majority of their time in the dayrooms and outdoor recreation areas. The outdoor recreation areas close at dark. Observed interactions between staff and detainees appeared professional. Employees use a language line, accessible in every housing area, to communicate when language is an issue.

Detainees were not hesitant to speak with the inspectors and freely shared their concerns. The inspection team interviewed no less than 90 detainees; including 51 formal interviews. LEP detainees stated that they had no issues obtaining services. Confidential interviews revealed no safety concerns. Two detainees stated that they had made marriage requests that had not been responded to. The ICE Officer stated that both requests were still in the approval process. Two detainees complained that they had medical issues. The medical records were reviewed and the doctor was interviewed by the Medical SME and both detainees are undergoing treatment. Several detainees stated that they did not like the food or the menu selection. The Safety SME



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stated the menu was certified by a dietician, was diverse, the portion sizes were appropriate, and meals were served at the appropriate temperatures.

Facility staff were professional in conduct and appearance. There is very little staff turnover and most employees have many years of experience. A significant amount of the staff are bilingual.

Medical services are provided by Wellpath. Food services are provided by the Trinity Corporation. All other services are provided by Orange County employees. There is no medical co-payment for ICE detainees.

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). No (0) standard was 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 noncompliance 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 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] and various other supervisors and staff



[REDACTED], Lead Compliance Inspector

April 18, 2019

Printed Name of LCI

Date