

September 26, 2019

TO: [REDACTED]
Assistant Director for Detention Management

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

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

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (Over 72 Hours-NDS) of the Clinton County Correctional Facility in McElhattan during the period of September 24-26, 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 National Detention Standards for Over 72 hour facilities (Over 72 hours-NDS). The facility received a previous rating of Acceptable during the November 2018 inspection.

Inspection Summary

The Clinton 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) - 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 annual inspections:

2018 Annual Inspection	
Acceptable	36
Deficient	0
Repeat Finding	0
Not Applicable	3

2019 Annual Inspection	
Acceptable	36
Deficient	0
Repeat Finding	0
Not Applicable	3

The inspection team identified seven (7) deficient components in the following four (4) standards:

- Classification System - 1
- Detainee Handbook – 2
- Food Service – 3
- Environmental Health and Safety – 1

Facility Snapshot/Description

The Clinton County Correctional Facility is a [REDACTED] facility owned and operated by the Clinton County Board of Commissioners. It currently houses male and female ICE detainees of all custody levels, U.S. Marshal Detainees, Clinton and surrounding county detainees and State of Pennsylvania technical parole violators. The facility is located in McElhattan, Pennsylvania approximately one hundred miles northwest of Harrisburg, Pennsylvania. [REDACTED]

The facility is a single structure of one- or two-story building wings. All of the wings are interconnected except for one housing unit. The perimeter of the facility is comprised of a single twelve-foot chain link fence supplemented with razor wire and the exterior walls of some buildings. There is not a paved road around the facility perimeter but the borderline is patrolled by an unarmed officer five times each day. The facility has eight different general population detainee housing units, ranging from units with one-person cells to forty bed dormitories. ICE detainees are housed with non-ICE populations of compatible classification levels. The housing unit day rooms are furnished with a television, telephones, tables and a dedicated electronic announcement/bulletin board which displays such information (English and Spanish) on a continuous loop. Each detainee has a personal property storage bin. Indoor and outdoor recreation is made available to all detainees for at least one hour a day, five days a week. The facility has recently installed electronic tablets for the detainees to use to communicate with ICE, facility staff and friends and family. Detainees will be able to file grievances electronically and submit information requests to ICE officers directly, in multiple languages. Informational posters will be placed on the tablets as well as the local detainee handbook. The modified housing/special management unit has a dedicated outdoor recreation area.

The atmosphere in the housing units was relaxed and detainees openly communicated with the inspection team and facility and ICE personnel. The officers were observed to be neatly groomed, approachable by the detainees and professional in their responses. Detainees were orderly throughout their daily movements and program/activity participation.



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The inspection team conducted no less than 49 detainee interviews. Twenty-one of the interviews were conducted in a confidential setting and 28 were in a common area. Seven of the confidential interviews were with LEP detainees using the language line. Four LEP detainees voiced concerns about their medical care to the inspectors. The medical concerns expressed by the detainees were addressed with health care personnel by the medical SME. All of the detainees were seen by medical personnel during the inspection and were provided the proper follow-up care or outside appointments were scheduled to address their medical concerns. One detainee complained that his family had been at the facility several times to visit but was not allowed in. An assistant OIC was interviewed in reference to this concern. Visitation records were reviewed and no documentation was found where a visit for the detainee was denied. The Visitation SME met with the detainee who could not remember when the family members were denied access. The assistant OIC met with the detainee to explain the visitation process and address any concerns he has related to visitation. Several detainees complained during confidential interviews that they were not allowed to proceed directly to the formal grievance process and had been denied the grievance forms from the unit officer. The handbook states that although informal resolution is encouraged, detainees may proceed directly to the formal grievance process. This issue was discussed with the OIC who stated that she would investigate and if necessary, provide remedial training to her staff. She also stated that lieutenants on each shift are required to visit every housing unit and make themselves available for detainee issues. She will address this issue with the lieutenants as well. Detainees voiced no substantive complaints or concerns when questioned about their personal safety, conditions of confinement, treatment by staff, consulate/court access, telephone access, visiting privileges, law library access or food services.

Medical services are provided by Wellpath and food services are provided by Aramark. Mental health services are provided by a separate contract with Crossroads Counseling, Inc. Maintenance services are provided by Clinton County employees. Sanitation of the housing units and administrative areas was observed to be above average.

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) standards were found Deficient and three (3) standards were Not Applicable (N/A). All remaining thirty-six (36) 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]



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- Facility Staff –

[REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector

September 26, 2019

Printed Name of LCI

Date