

December 10, 2020

TO: [REDACTED]  
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of Strafford County Corrections**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2008 / SAAPI 2011) of Strafford County Corrections, Dover, New Hampshire, during the period of December 8-10, 2020. 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 as a result of the December 2019 annual inspection.

### **Inspection Summary**

Strafford County Corrections 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 2019 and 2020 annual compliance inspections:

<b>2019 Annual Inspection</b>	
Meets Standards	38
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	3

<b>2019 Annual Inspection</b>	
Meets Standards	38
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	3

The inspection team identified six (6) deficient components in the following five (5) standards:

Special Management Units - 1  
 Staff-Detainee Communication - 1  
 Disciplinary System - 1  
 Suicide Prevention and Intervention - 1, which is a repeat deficiency  
 Visitation - 2

### **Facility Snapshot/Description**

Strafford County Corrections is located in Dover, New Hampshire approximately sixty miles northwest of Boston, Massachusetts. The facility is owned by Strafford County and operated under the jurisdiction of the Strafford County Board of Commissioners. [REDACTED] It currently houses adult male and female U.S. Marshals Service prisoners, Strafford and surrounding county detainees, State of New Hampshire inmates, Bureau of Prisons inmates from several areas, ICE detainees and ICE Air Operations detainees awaiting transfer out of the country. The facility houses all classification levels. [REDACTED]

The facility, constructed in 2004, is a two-story structure that houses the county jail. The exterior walls of the building comprise the perimeter of the facility. There is also a privacy fence that circles most of the building to prevent individuals from approaching the structure. There is no perimeter road encircling the compound but the building perimeter is foot patrolled by an unarmed officer each shift. The exterior doors of the building are alarmed and controlled by central control officers. The perimeter is covered by monitored camera surveillance. The facility surveillance network consists of 85 cameras that also monitor all housing units, common areas, and movement corridors; there are some blind spots inside the facility. Detainee movement is authorized by a pass system or it is escorted.

ICE detainees are housed with non-ICE detainees across seven housing units. One dormitory has 72 beds, and six housing units range in size from four to 36 cells; each cell is a two-bed design. Both direct and indirect supervision models are employed. The facility has two special management units; one four-cell unit (two beds each cell) for females, and one eight-cell unit (two beds each cell) for males. There was one detainee housed in the special management unit during the inspection. General population detainees have access to recreation for at least one hour each day. Detainees in administrative segregation are offered at least one hour of recreation seven days per week; detainees in disciplinary segregation are offered one hour of recreation five days per week.

Each of the housing units has a dayroom area equipped with at least one television, one information kiosk, telephones, table/chair units where detainees eat their meals, gather in conversation or participate in table games. Some of these activities are currently curtailed due to COVID-19 protocols.



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Each detainee at the facility is also issued an electronic tablet. These tablets are equipped with both the ICE National Detainee Handbook and the local handbook (English and Spanish) and allow detainees to make special access telephone calls (speed dial), correspond with various facility staff, order commissary, access LexisNexis, and view various informational postings. For a fee, detainees may also use the tablets for general video-visits, making personal telephone calls, and accessing movies, books and games. Detainees are not able to correspond with ICE personnel via the electronic tablets.

All detainees arriving at the facility are placed in a fourteen-day cohort (quarantine status) due to COVID-19 protocols. Additionally, ICE suspended on-site general/social visitation for ICE detainees in March 2020. Legal and professional visitation are exempt from this suspension. To mitigate the impact of the visitation suspension, ICE provides each detainee at the facility with 500 free minutes of telephone calls each month. The facility offers detainees one free five-minute video-visit per week.

Six detainees were interviewed individually by telephone. One of the interviews was with a detainee with limited English proficiency (LEP) who spoke only Portuguese; a telephonic language line interpreter service was used to facilitate this interview. Interviews included detainees housed in the general population and one confined to administrative segregation. The detainees interviewed stated they felt safe and were generally satisfied with the interaction, responsiveness and professionalism of facility and ICE staff and with access to medical services, mail, the law library, telephones, and recreation. One detainee stated that officers took too long to escort them to recreation which impacted the amount of time they were able to spend on the recreation yard. Some detainees stated that the food was good but the portions too small. One detainee stated that he thought the commissary prices and telephone calls were too expensive. And one detainee reported that he saw a dirty air vent. The detainees had not filed grievances regarding these issues. Another detainee stated that one officer had been disrespectful and yelled at him. The detainee reported he had not filed a grievance or contacted the OIG regarding this issue. The OIC was made aware of these statements and complaints.

Detainee telephone services, including the electronic tablets and kiosks, are provided via a contract with Global Tel-Link (GTL). All other services are provided by Strafford County.

ICE detainees do not incur medical co-pays.

### **Areas of Concern/Significant Observation**

The inspection team did not identify any areas of concern or 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 a review of policies, procedures, logs, photographs and/or videos to validate the observation of many standards. Additionally, interviews were conducted with multiple key staff members.

### **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 Performance Based National Detention Standards (PBNDS 2008 / SAAPI 2011). No (0) standards were found Does Not Meet Standard and three (3) standards were Not Applicable (N/A). All remaining thirty-eight (38) standards were found to Meet Standards.



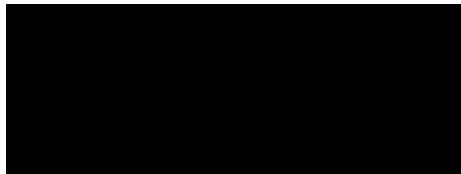
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### **LCI Assurance Statement**

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 telephonically and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials - [REDACTED]

- Facility Staff - [REDACTED]



[REDACTED], Lead Compliance Inspector

December 10, 2020

Printed Name of LCI

Date