

November 25, 2020

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 2019) of the Clinton County Correctional Facility in McElhattan, Pennsylvania during the period of November 23-25, 2020. This is an IGSA.

The annual 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]
Safety	[REDACTED]
Medical Care	[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 2019). The facility received a previous rating of Meets Standards during the September 2019 inspection.

Inspection Summary

The Richwood Correctional Center 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 NDS annual compliance inspections:

<i>2019 Annual Inspection</i>		<i>2020 Annual Inspection</i>	
Meets Standards	36	Meets Standards	31
Does Not Meet Standards	0	Does Not Meet Standards	0
Repeat Finding	0	Repeat Finding	0
Not Applicable	3	Not Applicable	2

The inspection team identified fifteen (15) deficient components in the following eight (8) standards:

Environmental Health and Safety - 1
 Detainee Funds and Personal Property - 2
 Sexual Abuse and Assault Prevention - 2
 Food Service - 1
 Medical Care - 5
 Personal Hygiene - 1
 Suicide Prevention and Intervention - 2
 Disability Identification, Assessment, and Accommodation - 1

Facility Snapshot/Description

The Clinton County Correctional Facility is a [REDACTED] facility owned and operated by the Clinton County Prison Board. 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, a bank of telephones, tables, and a dedicated electronic announcement/bulletin board that displays 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 provides detainees with electronic tablets to use to communicate with ICE, facility staff, and friends and family. Detainees can file grievances electronically and submit information requests to ICE officers directly in multiple languages. Informational posters are placed on the tablets as well as the local detainee handbook.

The inspection team conducted no less than 25 detainee interviews. The interviews were conducted over the telephone in a confidential setting. Two of the confidential interviews were with limited English proficient (LEP) detainees using the language line. They only spoke Mandarin Chinese. Three Spanish-speaking LEP detainees were interviewed by a bilingual inspector. The one female ICE detainee was interviewed. There were no ICE detainees housed in SMU. Several of the detainees complained about rice tasting bad during a recently served meal. The Safety SME followed up with the cook manager and stated



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that a meal was served that had onion in a rice casserole and an entire unit complained. The same casserole was served in the officer's dining room and received no complaints from the staff. The AOIC was interviewed and stated that he directed a lieutenant to check on the complaint and confirmed with the cook manager that onions were in the casserole recipe. The detainees were asked if they filed a grievance or called the OIG hotline with their complaint and they all replied no. They said they complained to the cook manager and the shift commander. They were informed that they could file a grievance or call the OIG hotline number to report such. There were no concerns voiced regarding the telephones, religious programs, law library, access to ICE staff, or their participation in in-dorm activities.

Medical services are provided by Wellpath Medical. The facility does not charge co-pays for medical, mental health, or dental care. Mental health services are provided by Crossroads Counseling and dental services are contracted through a local provider. Detainee telephone services are provided for Smart Communications.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations noted during the inspection. 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.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standard 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). No (0) standards were found Does Not Meet Standards and two (2) standards were Not Applicable (N/A). All remaining thirty-one (31) standards were found to Meet Standards.

LCI Assurance Statement

The findings of compliance and noncompliance 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 remotely and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following participated via telephone:

- ICE Officials – [REDACTED]
- Facility Staff – [REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector

November 25, 2020

Printed Name of LCI

Date