

December 30, 2020

TO: [REDACTED]  
Assistant Director for Detention Management

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

SUBJECT: **Annual Inspection of the Plymouth County Correctional Facility**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS) 2019 of the Plymouth County Correctional Facility in Plymouth, Massachusetts during the period of December 28-30, 2020. 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
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 NDS 2019 for Over 72-hour facilities. The facility received a rating of Meets Standards during the June 2019 annual inspection.

### **Inspection Summary**

The Plymouth County Correctional Facility is currently accredited by:

- The American Correctional Association (ACA) - Yes
- 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 inspections:



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<b>2019 Annual Inspection</b>	
Meets Standards	37
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

<b>2020 Annual Inspection</b>	
Meets Standards	32
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	1

The inspection team identified eleven (11) deficient components in the following nine (9) standards:

Environmental Health and Safety –1  
Transportation by Land -1  
Funds and Personal Property - 1  
Post Orders – 2  
Special Management Units – 2  
Food Service - 1  
Medical Care – 1  
Personal Hygiene – 1  
Grievance System - 1

### **Facility Snapshot/Description**

The Plymouth County Correctional Facility is located 45 miles southeast of Boston on the Atlantic Ocean coast. The facility is owned by the Commonwealth of Massachusetts and operated under the jurisdiction of the Plymouth County Sheriff's Department. [REDACTED]

The remaining detainees were from the U.S. Marshal Service, the Massachusetts Department of Corrections and Plymouth County and surrounding jurisdictions. The facility does not house females. [REDACTED]

The facility was built in 1994. It is a stand-alone multi-storied facility that is surrounded by two fourteen-foot-high chain link fences supplemented with razor ribbon on top and bottom, and a movement detection system installed on the interior fence line. A paved perimeter road encircles the complex; it is patrolled by an armed canine officer at least once each shift. Surveillance cameras offer visibility around the entire perimeter, into the housing units and common areas, and interior movement corridors. All exterior building doors are under constant camera surveillance and are controlled by central control staff. The facility is equipped with a surveillance camera network that is monitored 24 hours a day.

The facility has nineteen individual housing units of which three are dedicated to ICE detainees. Thirteen of the general population housing units are two-tier design, which contain configurations of two-bed, four-bed, or five-bed cells. Five of the units are dormitory settings, which contain from 62-139 beds. There is one special management unit; it has seventy cells equipped with either one bed or two beds. There were three ICE detainees in the SMU during the inspection. The facility has dedicated sections of its housing units to serve as COVID-19 wings; there were no positive COVID-19 cases amongst the ICE detainee population during the inspection. The health care unit is not a licensed infirmary but does have three observation rooms, which contain a total of five beds.

Each living area, except the SMU, has a common dayroom equipped with a television, fixed table/chair units for detainees to eat their meals, play games, and gather for conversation. There are no electronic tablets in the housing units. Each housing unit has two kiosks on which detainees can file grievances, order commissary, or view the LexisNexis law library collection. There are no video-visit stations in the



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housing units. All announcements and schedules are posted on the dayroom and common area bulletin boards. Detainees are provided indoor and outdoor recreation.

The inspectors conducted sixteen confidential detainee interviews during the inspection; three required the use of a language line. The detainees ranged from two months to two years of detention in the facility. Many of the detainees were DACA arrivals who have been in the country for years and were just awaiting status updates on their hearings. All of the detainees stated they felt safe at the facility and had not been threatened or mistreated by staff or other detainees, except for one, who was assaulted by two detainees shortly after his arrival. The two defendants were identified, escorted to segregation, disciplined, and transferred out of the facility. The complainant has endured no further harassment.

The detainees who registered medical concerns had their issues brought to the attention of the health services administrator by the medical SME. All concerns were previously addressed and proper care/treatment was provided. Follow-up appointments were scheduled as necessary.

Many of the detainees stated they did not like the food, but they all wanted more of it. This discontent was discussed with the food service manager by the safety SME. All cycle menus have been approved by a registered dietician as meeting or exceeding the nutritional requirements set by the USRDA. Detainees are served 2,900 calories a day. Only five grievances were filed on food service issues through the entire inspection period. It was deemed that no further action was necessary.

Few detainees stated they had filed a grievance. Those that had stated they were satisfied with the process even though judgment did not go in their favor. The grievants were aware of the OIG resource, but none of them had reached out for an intervention. Detainees were aware of the law library computers but had spent minimal time using the resource. Access to ICE/ERO personnel was not a concern. Detainees stated they saw their deportation officer frequently in the housing unit. None of the detainees stated they were dissatisfied with response times to their requests. Many of the detainees did not like the third-party source that screens their general correspondence, especially when it came to the transmission of copied family photos. The products were called grainy images that were poor substitutes for family pictures. All of the detainees stated the facility was clean.

An overall assessment of the general cleanliness of the facility could not be determined due to the remote nature of the inspection.

Medical services are provided by Correctional Psychiatric Services. Food service is contracted to Trinity Services Group. Maintenance operations are provided by Plymouth County employees. Detainee telephone services are provided by Securus Technologies. ICE detainees are not charged medical co-pays.

### **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.

### **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 for Over 72-hour facilities. No (0) standards were rated as Does Not Meet Standard and one (1) standard was Not Applicable (N/A). All remaining thirty-two (32) standards were found to Meet Standards.



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### **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. A call-in 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]

[REDACTED], Lead Compliance Inspector

December 30, 2020

Printed Name of LCI

Date