

October 30, 2020

TO: [REDACTED]
Assistant Director for Detention Management

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

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

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS 2019) and SAAP (PBND 2011) of the Orange County Correctional Facility in Goshen, New York, during the period of October 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
Security	[REDACTED]
Detainee Rights	[REDACTED]
Medical Care	[REDACTED]
Safety	[REDACTED]
Medical Care	[REDACTED]

Type of Inspection

This is a scheduled annual remote 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 April 2019 NDS annual inspection.

Inspection Summary

The Orange County Correctional Facility 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 2019 NDS and 2020 NDS 2019 compliance annual inspections.

2019 Annual Inspection	
Meets Standard	40
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	1

2020 Annual Inspection	
Meets Standard	30
Does Not Meet Standard	1
Repeat Finding	0
Not Applicable	2

The inspection team identified twenty-one (21) deficient components in the following seven (7) standards:

- Environmental Health and Safety - 1
- Facility Security and Control - 2
- Personal Hygiene - 1
- Disability Identification, Assessment, and Accommodation - 14
- Visitation - 1
- Detainee Handbook - 1
- Detention Files - 1

Facility Snapshot/Description

The Orange County Correctional Facility is under the jurisdiction of the Orange County Sheriff's Office and is located in the rural western outskirts of the village of Goshen, New York. The facility houses male and female ICE detainees of all custody levels; male and female Orange County detainees; State of New York inmates awaiting transfer to state facilities; and male and female U.S. Marshal detainees. 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, including a COVID-19 unit. 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

Fourteen remote confidential detainee interviews revealed no safety concerns. 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 within standard protocols. Several detainees stated that they did not like the food or the menu selection. The safety SME stated the menu was certified by a dietician, was diverse, the portion sizes were appropriate, and meals were served at the appropriate temperatures.



The Nakamoto Group, Inc.

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

Does Not Meet Standard: Disability Identification, Assessment, and Accommodation

Finding: The facility has developed a process, which includes reasonable timelines, for reviewing detainees' requests for accommodations related to a disability and for providing accommodations (including interim accommodations), modifications, and reassessments.

Recommendation: A disability identification, assessment and accommodation plan should be developed.

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. Additionally, interviews were conducted with multiple key staff members, as well as several detainees.

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) and PBNDS 2011 SAAP. One (1) standard was found Does Not Meet Standards and two (2) standards were Not Applicable (N/A). All remaining thirty (30) 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 telephonically 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

Printed Name of LCI

October 30, 2020

Date