

December 13, 2018

TO: [REDACTED]
Assistant Director for Detention Management

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

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

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2008 and SAAPI 2011 of the Strafford County Corrections in Dover, New Hampshire, during the period of December 11-13, 2018. 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
Security	[REDACTED]
Detainee Rights	[REDACTED]
Safety	[REDACTED]
Medical Care	[REDACTED]
Medical Care	[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 during the December 2017 inspection.

Inspection Summary

The 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 December 2017 and December 2018 PBNDS 2008 annual compliance inspections.



The Nakamoto Group, Inc.

2017 Annual Inspection	
Meets Standards	38
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	3

2018 Annual Inspection	
Meets Standards	38
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	3

The inspection team found eleven (11) component deficiencies in the following five (5) standards:

Environmental Health and Safety- 2
Special Management Units - 1
Food Service- 4 (one repeat deficiency and one priority deficiency)
Medical Care – 1 (priority deficiency)
Detainee Handbook - 3

Facility Snapshot/Description

The Strafford County Department of Corrections (SCDOC) is a maximum-security jail complex located in Dover, New Hampshire. [REDACTED] The facility is owned and operated by Strafford County. The OIC reports to the county board chairman. [REDACTED] This facility houses ICE detainees of all custody levels. [REDACTED] All detainees are screened and classified by ICE officials prior to their admission. [REDACTED]

The facility is a two-story jail comprised of direct and in-direct detainee supervision. Detainees are housed in cells and dormitories. The facility exterior walls are considered the secure perimeter and there is no security fence. The facility does not have a perimeter road. There are 64 surveillance cameras which provide visual observation of the critical movement and common areas inside the facility and the entire perimeter.

Each housing unit dayroom area is furnished with table, chairs, a television viewing area and a telephone bank. Detainees are each issued an electronic tablet upon admission. These tablets can be used for listening to music, telephone services, contacting facility staff through internal email, ordering commissary, reviewing the handbooks, and providing reading material and document sharing. Housing units provide adequate open space for leisure time activities. Indoor recreation areas are available on a regular basis. Detainees were observed participating in legal visitation, video visitation, board games, television viewing, reading, exercising and work details within the housing units. Detainees freely interacted with staff and each other, and did not hesitate to converse with the inspection team.

The inspection team interviewed a minimum of sixty detainees. Detainees were satisfied in regards to program services. There were no complaints or issues related to the quality of life. Confidential detainee interviews gave no indication of issues or concerns, and interviews with LEP detainees revealed that they had no problems obtaining services. Without exception, detainees stated that they felt safe at the facility. Detainees were familiar with ICE officers and understood how to obtain assistance from them. The ICE officer is available three days per week. There were several complaints regarding food portions. The Safety SME observed the portions during the inspection. As noted in the Food Services Standard, the meals are undergoing a nutritional analysis. The superintendent committed to ongoing follow up.

Facility employees gave a professional and courteous impression during interactions with the inspection team, and were witnessed interacting appropriately with detainees during the inspection. Facility sanitation conditions were noted to be acceptable. Graffiti was observed in the outdoor recreation areas.

All services, with the exception of specialized medical services (such as dental care and mental health) which are offered on a contractual part-time basis, are provided by Strafford County employees. Detainees are not charged a medical copayment.

Areas of Concern/Significant Observations

The following Priority Components were rated Does Not Meet:

Food Service

Component #16: A registered dietitian shall conduct a complete nutritional analysis that meets U.S. Recommended Daily Allowances (RDA), at least annually, of every master-cycle menu planned by the FSA. The dietitian must certify menus before they are incorporated into the food service program.

Finding: None of the master-cycle menus have been certified as nutritionally adequate by a registered dietitian.

Recommendation: A registered dietitian should certify the master cycle menus as nutritionally adequate.

Medical Care

Component #61 – The administrative health authority shall implement a system of internal review and quality assurance that includes data analysis, a multidisciplinary committee with regular monitoring of health service outcomes, and assessment of ongoing education and training needs.

Findings: According to the HSA, there is no system of internal review and quality assurance that includes data analysis, a multidisciplinary committee with regular monitoring of health services outcomes, and assessment of ongoing education and training needs since the last inspection.

Recommendation: A system of internal review and quality assurance that includes data analysis, a multidisciplinary committee with regular monitoring of health service outcomes and assessment of ongoing education and training needs should be implemented.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards. The facility complies with the ICE Performance Based National Detention Standards (PBNDS) 2008. Thirty-eight (38) standards were found to Meet Standards. Three (3) standards were Not Applicable.

LCI Assurance Statement

The findings of Meets Standards and Does Not Meet Standards 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]
- Facility Staff – [REDACTED]



The Nakamoto Group, Inc.



[Redacted], Lead Compliance Inspector

December 13, 2018

Printed Name of LCI

Date