



June 13, 2019

TO: [REDACTED]
Assistant Director for Detention Management

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

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

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS Over 72 Hours) of the Plymouth County Correctional Facility in Plymouth, MA during the period of June 11 -13, 2019. 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 NDS for Over 72 hour facilities. The facility received a previous rating of Acceptable during the June 2018 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 2018 and 2019 annual inspections:

2018 Annual Inspection	
Acceptable	37
Deficient	0
At Risk	0
Repeat Deficiency	0
Not Applicable	2

2019 Annual Inspection	
Acceptable	37
Deficient	0
At Risk	0
Repeat Deficiency	0
Not Applicable	2

The inspection team identified two (2) deficient components in the following standard:

Detainee Telephone Access- 2

Facility Snapshot/Description

The Plymouth County Correctional Facility (PCCF) is owned by the Commonwealth of Massachusetts and operated by the Plymouth County Sheriff's Department. The multi-storied facility is located in southern Plymouth, Massachusetts among other government buildings. PCCF houses adult male detainees of all classification levels for ICE, the United States Marshals Service, the Commonwealth of Massachusetts, Plymouth County, and other Massachusetts counties. [REDACTED]

[REDACTED] The detainee population has increased significantly during the inspection period. The local ICE staff stated that the facility has handled the increase without any negative issues.

The Plymouth County Correctional Facility is managed under the direct supervision model. All five ICE detainee housing units are situated on the same level and consist of one-person, two-person, and five-person cells. ICE detainees are housed and recreate separately from other detainees. The two-tiered cell blocks housing ICE detainees have large open dayroom spaces and attached outdoor recreation areas. Detainees may move freely between the dayroom and outdoor recreation area during waking hours; with the exception that the outdoor recreation area closes earlier in the evening than the dayroom. There is also a large gymnasium that is offered to ICE detainees twice per week for recreation. The entire facility is climate controlled.

The atmosphere was calm during the inspection with no obvious indicators of high stress levels. Sanitation was above average and noise levels were low. Staff were professional in appearance and demeanor; and those facility employees whose regular duties involved ICE detainees demonstrated a knowledge of the standards. A number of employees are bilingual and the language line is readily available. The facility has also purchased and is utilizing portable translation devices. The devices are available in the housing units and have proven to be useful and time-saving for staff and detainees as they can be utilized instantaneously as the officers are making rounds or when they are approached by detainees with questions. Observed interactions between staff and detainees were respectful and professional. Detainees approached ICE staff, facility staff, and the inspectors without apparent reservation. ICE officers were observed interviewing ICE detainees and detainees appeared comfortable talking with them. Detainees were observed exercising in the recreation yards and gymnasium, playing games in the dayrooms, and watching television.

The inspection team conducted no less than 112 detainee interviews; 31 of which were formal interviews. Several detainees complained that they did not like the food and that potatoes were served too often. The Safety SME confirmed that the menu contained a satisfactory variety of ethnic foods; that portions met the requirements of the standards; was served at appropriate temperatures; and that the menu was approved by a dietician. A number of detainees complained about the telephones. The facility has recently changed providers and the system is in the process of converting which has caused a number of issues; most notably that access to the ICE platform of free calls, including the OIG, is not readily accessible to detainees at all times. One detainee claimed that he needed glasses. The Medical SME investigated the complaint and discovered that his glasses



The Nakamoto Group, Inc.

were on order. Two detainees complained that their sick call requests were not being responded to. The Medical SME verified that sick call requests are routinely responded to either the same day or the following day from submission and that both of the complaining detainees had been seen by medical staff recently and frequently. One detainee complained that he could not get an ace bandage for his leg. The Medical SME checked the medical record and determined that the detainee had been provided a compression bandage for his leg and that ace bandages were not issued at this facility due to the inherent security concerns with them. One detainee stated that he had multiple problems and needed to see the medical staff. The Medical SME investigated and discovered that the detainee was seen by a doctor just prior to the interview and had been seen frequently during his stay for multiple issues. One detainee stated that his property had been lost by the property room staff. The inspector checked the property room and the detainee's property was safely in storage. Two detainees stated that they had been locked down for more than 24 hours last week. The facility had a major shakedown on that day and the entire facility was on lockdown. One detainee inquired about getting language assistance for the Arabic language. He was referred to the unit case worker, who interviews LEP detainees using the language line. One safety concern was raised by a detainee that stated he had been assaulted and thought he should be in a lower classification level. The assault had been investigated and the aggressor had been penalized and moved from the facility. The detainee was provided the information to be able to appeal his classification to ICE. Confidential and LEP detainee interviews revealed no issues obtaining services.

There is no medical co-payment for ICE detainees. The HSA, doctor, dentist, and mental health staff are contract employees. Food service operations are contracted with the Trinity Services Group. All other staff are Plymouth County employees.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Acceptable. The facility complies with the ICE National Detention Standards (NDS) for Over 72 hour facilities. No (0) standards were found Deficient and two (2) standards were Not Applicable (N/A). All remaining thirty-seven (37) standards were found to be in compliance.

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 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] and various other supervisors and staff.

[REDACTED]

[REDACTED], Lead Compliance Inspector

June 13, 2019

Printed Name of LCI

Date