July 30, 2021

TO:  
Assistant Director Custody Management

FROM:  
Lead Compliance Inspector  
The Nakamoto Group, Inc.

SUBJECT:  Annual Inspection of the Folkston ICE Processing Center Annex

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2011) of the Folkston ICE Processing Center Annex in Folkston, Georgia during the period of July 28-30, 2021. This is a DIGSA.

The annual inspection was performed under the guidance of Lead Compliance Inspector. Team members were:

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<th>Subject Matter Field</th>
<th>Team Member</th>
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<tr>
<td>Safety</td>
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<td>Security</td>
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<td>Medical Care</td>
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<td>Detainee Rights</td>
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**Type of Inspection**

This is a scheduled annual inspection to determine overall compliance with the ICE PBNDS 2011 for Over 72-hour facilities. The facility received a rating of Meets Standards during the October 2020 annual inspection.

**Inspection Summary**

The Folkston ICE Processing Center Annex 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 October 2020 and July 2021 PBNDS annual inspections:
The inspection team identified two (2) deficient components in the following one (1) standard:

**Visitation** – 2, both priority components

**Facility Snapshot/Description**

The Folkston ICE Processing Center Annex is located on the north side of Folkston, Georgia. The facility is owned and operated by The Geo Group, Inc. (detention contractor). The facility is a DIGSA located adjacent to the parent Folkston ICE Processing Center. The compound is encircled by independent fencing.

The facility was built in 2008. The complex is comprised of two separate single story buildings; one contains the housing units and the other is a support services center. The secure outer perimeter of the compound is designed with two twelve-foot chain link fences with rows of razor ribbon affixed to the interior side of the exterior fence. Between the fences a movement detection system (shaker fence) and microwave sensors have been installed. The facility is encircled by a perimeter road that is irregularly patrolled by an unarmed officer in a vehicle 24 hours a day. Surveillance cameras offer visibility around the entire perimeter, into the housing units, the common areas, and interior movement corridors. All exterior building doors and interior movement corridor doors are controlled by central control staff and are under constant camera surveillance through a 67 surveillance camera network that is monitored 24 hours a day.

The facility has six individual housing units managed by direct supervision. Utility officers perform escort duties; all movement is escorted. The housing units are all two-tier designs configured into dormitory and two-bed cells. The housing units range in size from 32 to 116 beds. Five of the housing units are for general population, and one unit serves as the special management unit (SMU); it contains twelve cells populated with 24 beds. There were no ICE detainees in the SMU during the inspection. One housing unit (C2) currently serves as a COVID-19 quarantine/isolation unit where newly admitted detainees and existing detainees are housed until negative testing results/protocols are complete. During the inspection there were no active COVID-19 cases in the facility. The health care unit is not an infirmary but does have three rooms with a total of four beds which are used for treatment and/or observation.

Each housing unit has a common dayroom equipped with three televisions, telephone stations, a bank of electronic tablets, and fixed table/chair units for detainees to eat their meals, play games, and gather for conversation. Information not included on the tablets, including consulate numbers, legal services postings, etc., is posted on the housing units’ bulletin boards. Tablets are available to detainees at a ratio of one tablet for eight detainees. Tablets provide detainees the ability to retrieve the facility handbook in several languages; access commissary account balances; submit ICE/facility requests; retrieve all program/activity schedules; send/receive personal emails; telephone services; participate in video-visits; play electronic games; and read books. Dayrooms are accessible from 6:00 a.m. to 12:00 p.m. (midnight) on
Mondays to Fridays, and from 6:00 a.m. to 2:00 a.m. on weekends and holidays. Detainees are provided daily indoor and outdoor recreation. The facility is maintaining an above average level of sanitation.

The inspectors conducted 23 confidential detainee interviews during the inspection; eleven required an interpreter. Their length of stay in the facility ranged from fifteen days to three months. All of the detainees stated they felt safe at the facility and had not been threatened or mistreated by staff or other detainees. The detainees were aware of OIG services but have not needed to make contact with them.

Recreation time was satisfactory. Grievances were heard fairly and the results were provided promptly; only ten grievances were filed during this inspection period. Overall, the detainees were very content with their living conditions, the cleanliness of the facility, and their treatment by staff and other detainees. There were no deaths, suicide attempts, escapes, sexual abuse or assault allegations, hunger strikes, or calculated uses of force reported during this inspection period.

Medical, dental, and mental health are provided by IHSC employees which took over providing these services from The Geo Group, Inc. employees on 05/10/2021. Maintenance services are provided by The Geo Group, Inc. employees. Detainee telephone and tablet services are provided by Talion Communication. Kiosk services are provided by the Keefe Group. Detainees are not charged co-pays for medical, mental health, or dental care services.

**Areas of Concern/Significant Observations**

On 7/30/2021 tours through the housing unit building (where they house the high custody level detainees) and the six individual housing units contained therein revealed a significant concern with the pedestrian entrance/exit doors. Most of the doors were not latched/locked because they were not fully closed. There were posted signs by or on all common doors stating: “Please secure all doors behind you. Do not prop doors open”. There was also concern registered when the inspectors were questioning the central control officers and shift supervisor about control panel operations; they were unsure of the answers and not well versed on control center capabilities. When reviewing the central control panel door lights, it was observed that five of the common door indicator lights in the housing unit building were lit indicating the doors were unsecure. When the central control staff was questioned about the alert, the response was: “...well, you cannot always rely on those lights being accurate”. This condition and behavior is a predictable forecast of a security casualty. This issue was immediately discussed with the compliance administrator, OIC, and assistant OIC by the inspection team. Corrective action began promptly thereafter.

The facility is providing the following optimal levels of service as described in the standards in: 2.12 – Special Management Units (SMU), detainees in the SMU in disciplinary segregation status receive a daily recreation period of one hour per day, and SMU administrative segregation status detainees receive two hours of daily recreation per day; 2.15 – Use of Force and Restraints, use of force audiovisual records are retained by the facility for at least one year after litigation or any investigation has concluded or been resolved; 4.3 – Medical Care, the facility is accredited by ACA and NCCHC; 4.6 – Significant Self-Harm and Suicide Prevention and Intervention, prevention/treatment and therapeutic aftercare for suicidal detainees or detainees at risk for self-harm are within NCCHC standards; 4.7 – Terminal Illness, Advance Directives and Death, medical care for terminally ill detainees are within NCCHC standards; 5.4 - Recreation, special management unit (SMU) detainees in administrative segregation status are provided outdoor recreation daily for two hours, and SMU detainees in disciplinary segregation status are provided outdoor recreation daily for one hour; 5.6 - Telephone Access, the housing units are providing telephones at a ratio of one phone for every ten detainees; and 6.3 - Law Libraries and Legal Materials, detainees are provided law library access hours for more than fifteen hours per week.
This was a hybrid inspection in which some inspectors worked remotely. Remote inspectors were unable to personally observe practices and procedures within the facility and relied upon photographs and/or videos to validate the observation of many standards. There were two priority components rated Does Not Meet Standard. Details are described as follows.

5.7 - Visitation

**Component 5: PRIORITY:** General visitation is permitted during set hours on Saturdays, Sundays, and holidays, and, to the extent practicable, the facility also establishes visiting hours on weekdays and during evening hours. The facility accommodates the scheduling needs of visitors for whom scheduled visiting hours pose a hardship. The number of visitors a detainee receives and the length of visits are limited only by reasonable constraints of space, scheduling, staff availability, safety, security, and good order.

**Finding:** General visitation has been suspended during this inspection period due to COVID-19. Video visits are available to detainees using the tablets in the housing units. There is a charge for the visits. Indigent detainees do not have access to visits.

**Recommendation:** Provide an accommodation for a contact/non-contact and/or video-visit that is safe and does not charge a fee.

**Component 9: PRIORITY:** The facility’s written rules shall specify time limits for visits. Visits should be for the maximum period practicable but not less than one hour with special consideration given to family circumstances and individuals who have traveled long distances.

**Finding:** Normally detainees are permitted a minimum of one hour for a visit. Special consideration is given to individuals who have traveled along distance or who have unusual circumstances. On-site general visitation has been suspended during this inspection period due to COVID-19. Detainees may visit using the tablets in the housing units for a fee. No accommodation is made for indigent detainees.

**Recommendation:** Provide an accommodation for a contact/non-contact and/or video-visit that is safe and does not charge a fee.

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**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 Performance-Based National Detention Standards (PBNDS) 2011 for Over 72-hour facilities. No (0) standards were rated as Does Not Meet Standard and two (2) standards were Not Applicable (N/A). All remaining forty (40) standards were found to Meet Standards.

**LCI Assurance Statement**

The findings of compliance and non-compliance 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 at the facility and in addition to the entire Nakamoto Group, Inc. Inspection Team (one SME via conference call) the following were present:

- **ICE Officials**

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