

April 28, 2021

TO: [REDACTED]  
Assistant Director Custody Management

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

SUBJECT: **Annual Inspection of the Caroline Detention Facility**

The Nakamoto Group, Inc. performed an annual Hybrid inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 (Revised 2016) of the Caroline Detention Facility in Bowling Green, Virginia during the period of April 26-28, 2021. This is a DIGSA facility.

The annual inspection was performed under the guidance of [REDACTED], Lead Compliance Inspector. The Safety SME, Security SME, and Detainee Rights SME worked on-site. The Medical SMEs worked remotely. Team members were:

Subject Matter Field	Team Member Number
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 PBNDS 2011 for Over 72-hour facilities. The facility received a rating of Meets Standards during the September 2020 inspection.

**Inspection Summary**

The Caroline Detention Facility is currently accredited by:

- The American Correctional Association (ACA) - No
- The National Commission on Correctional Health Care (NCCCHC) - 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 2020 and 2021 PBNDS 2011 annual compliance inspections:



<b>2020 Annual Inspection</b>	
Meets Standards	40
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

<b>2021 Annual Inspection</b>	
Meets Standards	40
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	3

The inspection team identified four (4) deficient components in the following three (3) standards:

- Special Management Units – 1
- Staff/Detainee Communication - 1
- Visitation – 2, both of which are priority components

### **Facility Snapshot/Description**

The Caroline Detention Facility is located in a rural area of Bowling Green, Virginia. The facility is governed by the Peumansend Regional Jail Authority. Although “regional” is in the title of the Authority, neither the facility nor the Authority is regional. The Authority is considered a Jail Authority. Current members of the Jail Authority are from Caroline County and the town of Port Royal. The facility land is leased to Caroline County while the Jail Authority owns the buildings and assets. The direct supervision facility began housing ICE detainees on September 4, 2018. The facility currently houses male ICE detainees of all classification levels.

ICE officers maintain an on-site presence in the facility.

The facility has six housing units with a design capacity of 56 detainees per unit. The units are single-story design with each unit containing a lower and upper tier. Both cell and dormitory beds are available. Each housing unit has a dayroom that provides open space and seating for detainees to socialize and tables for board games. Board games, televisions, microwaves, telephones, video visitation kiosks, and tablets are available for detainees. A law library computer and printer are also available in a separate room. For a fee, detainees may visit with family and friends through video visitation. Prior to COVID-19, on-site contact and non-contact visitation were available. Recreation is afforded through a full-size gymnasium and an outdoor recreation yard with basketball and volleyball courts. Meals are served by satellite or in the dining room, depending on detainee custody status.

Due to COVID-19, this inspection was conducted with two inspectors working remotely. At the request of the inspection team, the facility posted notices in English and Spanish announcing the inspection and requesting any detainee who wished to be interviewed to sign up. Twelve detainees requested an interview. All detainees were interviewed. Twenty-two additional detainees were interviewed informally in the intake unit, kitchen, recreation, housing units, and program services. All detainees stated that they felt safe in the facility and that they were treated well by staff. Several detainees stated that the food was “not good”. Several detainees stated that the food “was really good”. Detainees stated that the facility was kept clean and that extra cleaning steps were being taken due to COVID-19. One detainee stated that he filed several grievances and has called the OIG hotline. He stated, “that he did not like the responses he received.”



Facility staff were well versed in facility policy and the requirements of the standards and were responsive to all requests made by the inspection team.

Medical care is provided by IHSC and food services are provided by Trinity Services Group. Detainees are not charged co-pay fees for medical, dental, or mental health services

### **Areas of Concern/Significant Observations**

Two inspectors worked remotely. 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. Two priority components were rated Does Not Meet Standards:

### **Visitation**

#### ***Priority Component #5***

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 was suspended by ICE in March 2020 due to the COVID-19 pandemic. Per the OIC and substantiated by a review of policy and procedures, before the imposition of the suspension, the facility met the requirements of the standard. Detainees continue to have access to social visits seven days per week, via the HomWav platform. Kiosks are located in each housing unit. However, these visits are fee-based. Detainees do not have a no-fee option available for social visits to meet the basic requirements of the standard. According to the OIC, whenever ICE authorizes on-site general visitation, contact and non-contact visitation will be permitted seven days per week, including Saturdays, Sundays, and holidays, and will be limited only by reasonable constraints of space, scheduling, staff availability, safety, security, and good order as required by the component.

*Recommendation:* Offer visitation without a fee on Saturdays, Sundays, and holidays.

#### ***Priority Component #9***

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:* General visitation was suspended by ICE in March 2020 due to the COVID-19 pandemic. Per the OIC and substantiated by a review of policy, before the imposition of the suspension, the facility met the requirements of the standard. Detainees continue to have access to social visits seven days per week, with no time constraints, via the HomWav kiosks located in each housing unit. However, these visits are all fee-based. Detainees do not have a no-fee option available for social visits to meet the basic requirements of the standard. According to the OIC, whenever ICE authorizes on-site general visitation, visitation will be permitted seven days per week, including Saturdays, Sundays, and holidays, and will permit on-site visits of no less than one hour with special consideration given to family circumstances and individuals who have traveled long distances.

*Recommendation:* Offer visitation without a fee on Saturdays, Sundays, and holidays.



**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. No (0) standards were found Does Not Meet Standard and three (3) 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-324 Inspection Form and are supported by documentation in the inspection file. In addition to the entire Nakamoto Group Inspection Team, the following facility and ICE/ERO personnel participated in or listened telephonically to the out brief conference:

- ICE staff - [redacted]
- IHSC staff- [redacted]
- Facility Staff - [redacted]

[redacted] Lead Compliance Inspector	April 28, 2021
Printed Name of LCI	Date

