



The Nakamoto Group, Inc.

April 28, 2022

TO: [REDACTED]  
Acting 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 2011 of the Caroline Detention Facility in Bowling Green, Virginia during the period of April 26-28, 2022. This is a DIGSA.

The inspection was performed under the guidance of Lead Compliance [REDACTED]. 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 PBNDS 2011 for Over 72-hour facilities. The facility received a previous rating of Meets Standards during the April 2021 annual inspection.

### **Inspection Summary**

The Caroline Detention Facility 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 2021 and 2022 annual compliance inspections:



The Nakamoto Group, Inc.

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

<b>2022 Annual Inspection</b>	
Meets Standard	40
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	3

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

Special Management Units – 1, which is a priority component  
Correspondence and Other Mail – 1

### **Facility Snapshot/Description**

The Caroline Detention Facility is located in Bowling Green, Virginia and is owned and operated by the Peumansend Creek Regional Jail Authority. The facility is situated in a rural area approximately forty miles north of Richmond, Virginia. With a capacity of [REDACTED] beds, this DIGSA houses [REDACTED] custody levels of [REDACTED] detainees for ICE. [REDACTED]

The facility is a single-story structure with [REDACTED]-tiered housing units comprised of [REDACTED]-person rooms. Each housing unit has a capacity of [REDACTED] beds managed under the direct supervision model. There is one special management unit (SMU) at this facility containing [REDACTED] [REDACTED] cells. On the first day of the inspection, there were [REDACTED] detainees housed in the special management unit. The facility does not maintain infirmary care beds in their medical unit.

The living units were found to be well lit with both natural and artificial light and adequate open space for detainees. The dayrooms are furnished with tables and chairs for detainees to participate in leisure time activities, socializing, playing board games, and playing cards. Televisions are available for detainees to view and detainees have access to a kiosk for video visitation and computer tablets. Each housing unit has a law library that contains at least one computer that is programmed with LexisNexis for detainees to conduct legal research. Computer tablets are not programmed to communicate with ICE and facility staff. Group religious services have been suspended due to health concerns associated with the COVID-19 virus. General visitation has also been temporarily suspended due to health concerns associated with the COVID-19 virus. Remote video visitation is available to detainees through a video call provider as a general visitation option; however, this service is not free. As a COVID-19 precaution, all newly received detainees are quarantined upon admission to the facility for fourteen days. Detainees complaining of symptoms will be COVID-19 tested immediately. There is one large outdoor recreation yard and an indoor gymnasium available to detainees. The recreation yard has drinking water available, but detainees are escorted back to their housing unit if a restroom break is required. Detainees participate in a voluntary work program at this facility.

The facility is climate controlled, and the physical plant was found to be in good repair. All staff interviewed were well-versed in facility guidelines and operating procedures as well as the National Detention Standards. Officers and other staff were professional during interviews and detainees interviewed spoke willingly and respectfully. The facility employs an adequate number of bilingual staff to assist in communicating with limited English proficient (LEP) detainees. A translation service is also available. A review of sanitation inspection reports, interviews with staff and detainees, and observation by on-site inspectors concluded that the sanitation level of the facility was acceptable.

The inspection team interviewed 45 detainees housed at the facility during the inspection including 25 formal interviews. Limited English proficient detainees were interviewed with the assistance of an interpreter and a bilingual inspection team member. There were no substantive concerns voiced when asked about personal



safety, access to mail, treatment by staff, or access to recreation. Inspectors verified that memoranda, posters, and other types of key information are posted in English and Spanish throughout the facility. While conducting formal interviews, all detainees confirmed receiving a National Detainee Handbook and local supplement upon admission to the facility. Some detainees complained of not seeing ICE representatives as often as they would like; however, a review of housing unit logs and interview with facility staff found that ICE staff is visiting housing units at least weekly. There were some complaints of the quality and quantity of food being served with most detainees describing the food as “average”. The Safety SME observed food portion sizes to be adequate during the inspection and verified that the facility followed the cycle menu that had a variety of food items in rotation. During interpreter assisted LEP interviews, two detainees had medical concerns related to the type of treatment that they were receiving. At the start of the first interview, one detainee stated that he had been spitting up blood. The interview was immediately terminated and the detainee was escorted to the medical area for assessment. The second detainee with medical concerns alleged that he received a head injury while living in the community and complained that the injury causes him headaches. He further stated that the medical department, to include the facility doctor, is aware of his complaints but doesn’t feel as though he is receiving appropriate medical treatment. The Medical SME found that the Medical Director and midlevel providers were immediately aware of this detainee’s medical issues and provided documentation that verified that the detainee is being routinely evaluated including seeing outside medical specialists and having diagnostic testing completed. Finally, during interviews conducted by the Detainee Rights SME, one detainee alleged that he was recently inappropriately touched by a detention officer. The Medical SME interviewed the PSA Compliance Manager and reviewed documentation to confirm that the allegation had already been brought to the staff’s attention and was being investigated. Detainees were reminded of the proper procedures for filing grievances and the availability of the OIG hotline for submitting complaints.

Food service is provided by Trinity Foods and STG International provides supplemental medical staff under contract with IHSC. The facility does not charge co-pays for medical, mental health, or dental care. ViaPath provides detainee telephone and computer tablet services while HomeWav provides kiosks for detainees to participate in video visitation.

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

The inspection was conducted as a hybrid. Three inspectors were on site and two inspectors worked remotely. The remote inspectors were unable to personally observe practices and procedures within the facility and relied on on-site inspector’s observations, photographs, and/or videos to validate the observation of many standards.

Optimal compliance was confirmed in the following standards: Use of Force; Admission and Release; and Law Libraries and Legal Material.

#### **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. No (0) standard was rated as 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-324A Inspection Form and are supported by documentation in the inspection file. An out brief, with some participating telephonically, was conducted and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following participated:



The Nakamoto Group, Inc.

- ICE Officials – [REDACTED]
- Facility Staff – [REDACTED]

[REDACTED] Lead Compliance Inspector  
Printed Name of LCI

April 28, 2022  
Date