March 24, 2021

TO: [Name]  
Assistant Director Custody Management

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

SUBJECT: Annual Detention Inspection of the Chippewa County Correctional Facility

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS 2019) of the Chippewa County Correctional Facility during the period of March 22-24, 2021. This is an IGSA facility.

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

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

This is a scheduled annual inspection, which is performed to determine overall compliance with the ICE National Detention Standards (NDS 2019) for Over 72 hour facilities. The facility was not inspected in 2020.

Inspection Summary

The Chippewa County Correctional 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) - No

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 annual inspection:
The inspection team identified thirty (30) deficient components in the following eighteen (18) standards:

Environmental Health and Safety - 1
Hold Rooms- 1
Searches of Detainees- 1
Special Management Units – 1
Sexual Abuse and Assault Prevention- 2
Disciplinary System -2
Food Service - 1
Hunger Strike - 1
Access to Medical Care — 7
Suicide Prevention and Intervention - 2
Correspondence and Other Mail -1
Recreation - 1
Telephone Access – 1
Visitation – 3
Detainee Handbook – 1
Law Library and Legal Materials – 1
Detention Files – 1
Detainee Transfers - 2

Facility Snapshot/Description

The Chippewa County Correctional Facility is operated by the Chippewa County Sheriff's Department. The facility is located in the business district of downtown Sault Sainte Marie, Michigan. This IGSA facility houses adult male and female detainees for Immigration and Customs Enforcement, U.S. Marshals Service, Bureau of Prisons, Chippewa County, and the Sault and Bay Mills tribes.

The Chippewa County Correctional Facility physical plant is comprised of a two-story building. Secure housing units are located on one level of the building. The facility was constructed in three phases over the past sixty-six (66) years (1955, 1999, and 2009). Housing unit capacities range from sixteen beds to single cells. Housing unit surveillance is provided by indirect supervision from the main control officer. Irregular monitoring is provided for all housing units and documented via the Guard 1 Plus electronic accountability system. Detainees are afforded the opportunity for both indoor/outdoor recreation. Detainees have access to televisions and board games, as well as, reading materials. The facility is climate controlled. Telephones are available in the general population housing units at a ratio of at least one telephone for every twelve detainees.

The inspection team found the atmosphere to be calm with no obvious indicators of high stress levels. During the inspection, facility sanitation was observed to be average. Noise levels were minimal. All staff encountered
by the inspection team exhibited a professional demeanor. Interactions between staff and ICE detainees were observed to be respectful and professional.

One detainee volunteered to be interviewed. The interview was conducted in a confidential setting. The detainee has been housed at the facility for fourteen months. He indicated general satisfaction with living conditions, access to the law library mobile cart, food service, safety, and access to staff. The detainee complained that his dental issues were not being addressed by health care personnel. The detainee’s health record was reviewed by the medical SME. The detainee was evaluated by health care staff in a timely manner. According to the Health Services Administrator, one appointment was canceled due to COVID-19 restrictions. The detainee is requesting “restorative dental work”. The treatment plan includes cell extractions. The detainee stated that telephone rates and commissary rates “are really high”. Telephone rates are included in the Telephone Access standard. The detainee requested more recreation activities. He stated that ICE staff and facility staff are professional and respectful. The detainee has filed grievances and has called the OIG hotline. The detainee complained, “that he did not receive a response from OIG until he had written or called several times”.

The facility does not charge a co-pay for medical, mental health, or dental care. Wellpath provides medical services. All other services are provided by county employees.

Areas of Concern/Significant Observations

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

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 remote inspection team. No (0) standards were found Does Not Meet and two (2) standards were Not Applicable (N/A). All remaining thirty-one (31) 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. An out brief was conducted at the facility and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present or participated via conference line:

- ICE Officials —
- Facility Staff —
- [Blacked out]

[Blacked out], Lead Compliance Inspector

March 24, 2021

Printed Name of LCI

Date