

September 30, 2021

TO: [REDACTED]
Assistant Director Custody Management

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

SUBJECT: **Annual Inspection of the Clinton County Correctional Facility**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (Over 72 Hours-NDS-2019) Clinton County Correctional Facility in McElhattan, Pennsylvania during the period of September 28-30, 2021. This is an IGSA.

The annual 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]
Safety	[REDACTED]
Medical Care	[REDACTED]

Type of Inspection

This is a scheduled annual inspection which is performed to determine overall compliance with the ICE National Detention Standards for Over 72 hour facilities (Over 72 hours-NDS-2019). The facility received a rating of Meets Standards during the November 2020 inspection.

Inspection Summary

The Clinton 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) - 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 NDS annual compliance inspections:

2020 Annual Inspection	
Meets Standards	31
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

2021 Annual Inspection	
Meets Standards	31
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

The inspection team identified eight (8) deficient components in the following three (3) standards:

- Environmental Health and Safety - 1
- Food Service - 5
- Medical Care - 2, both of which are repeat deficiencies

Facility Snapshot/Description

The Clinton County Correctional Facility is a [REDACTED] facility owned and operated by the Clinton County Prison Board. The facility houses both male and female ICE detainees of all custody levels, U.S. Marshals detainees, Clinton and surrounding county detainees and State of Pennsylvania technical parole violators. The facility is located in McElhattan, Pennsylvania approximately 45 miles northeast of State College, Pennsylvania. [REDACTED]

The facility is a single structure of one- or two-story building wings. All of the wings are interconnected except for one housing unit. The perimeter of the facility is comprised of a single twelve-foot chain link fence supplemented with razor wire and the exterior walls of some buildings. There is not a paved road around the facility perimeter but the borderline is patrolled by an unarmed officer five times each day. The facility has eight different general population detainee housing units ranging from units with one-person cells to forty-bed dormitories. ICE detainees are housed with non-ICE populations of compatible classification levels. The housing unit day rooms are furnished with a television, a bank of telephones, tables, and a dedicated electronic announcement/bulletin board that displays information (English and Spanish) on a continuous loop. Each detainee has a personal property storage bin. Indoor and outdoor recreation is made available to all detainees for at least one hour a day, five days a week. The facility provides detainees with electronic tablets to use to communicate with ICE, facility staff, friends and family. Detainees are able to file grievances electronically and submit information requests to ICE officers directly in multiple languages. Informational posters are placed on the tablets as well as the local detainee handbook.

The inspection team conducted no less than twenty confidential detainee interviews, fifteen formal and five informal. Two of the confidential interviews were with LEP detainees using a language line. There were no ICE detainees housed in SMU. The detainees were asked if they filed a grievance or called the OIG hotline with their complaint and they all replied no. They stated they knew that they could file a grievance or call the OIG hotline number to report concerns or complaints, but none interviewed had done so. Many of the detainees reported the food at the facility was not good citing too few fruits, vegetables, or protein sources and too much starch. The Safety SME reviewed the menu and found that it contained a good variety of foods and the facility was using standard recipes. All detainees reported they received a handbook upon admission and the LEP detainees confirmed they received a handbook in Spanish. All detainees reported the facility was clean with the exception of one detainee who said the showers and bathrooms needed more frequent cleaning. All detainees stated that they felt safe at the facility except one



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detainee who had extremely limited eye sight and claimed he was worried about his safety. The Medical SME and HSA confirmed that the detainee with limited sight was scheduled to visit an eye doctor the following week. All detainees reported access to ICE staff, recreation facilities, mail services, the law library, religious services, visitation, and telephones. All detainees reported they were treated fairly by the staff at the facility.

Sanitation was observed to be above average in all areas of the facility by the on-site inspection team.

Medical services are provided by Wellpath. Mental health services are provided by Crossroad Counseling, Inc. and food services are provided by Aramark. All other services are provided by Clinton County employees. ICE detainees are not charged a co-pay for medical, dental, or mental health services.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations. This inspection was conducted as a hybrid inspection with four inspectors on-site and one inspector working remotely. The remote inspector was unable to personally observe practices and procedures within the facility. The remote inspector relied on photographs and/or videos to validate 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 inspection team. The facility complies with the ICE National Detention Standards (NDS) 2019. No (0) standards were found Does Not Meet Standards 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 noncompliance 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 telephonically and in person with facility staff and ICE representatives. In addition to the entire Nakamoto Group, Inc. Inspection Team, the following participated in the call:

- ICE Officials – [REDACTED]

- Facility Staff – [REDACTED]

[REDACTED] Lead Compliance Inspector

September 30, 2021

Printed Name of LCI

Date