



November 8, 2018

TO: [REDACTED]  
Assistant Director for Detention Management

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

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

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS Over 72 Hours)) of the Clinton County Correctional Facility in McElhattan, PA during the period of November 6-8, 2018. This is an IGSA facility.

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

Subject Matter Field	Team Member
Safety	[REDACTED]
Security	[REDACTED]
Medical Care	[REDACTED]
Detainee Rights	[REDACTED]
Medical Care	[REDACTED]

**Type of Inspection**

This is a scheduled annual inspection which is performed to determine overall compliance with the ICE NDS for Over 72 hour facilities. The facility received a previous rating of Acceptable during the September 2017 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 2017 and 2018 annual inspections:



<b>2017 Annual Inspection</b>	
Acceptable	36
Deficient	0
At Risk	0
Repeat Finding	0
Not Applicable	3

<b>2018 Annual Inspection</b>	
Acceptable	36
Deficient	0
At Risk	0
Repeat Finding	0
Not Applicable	3

The inspection team identified eight (8) deficient components in the following six (6) standards:

- Funds and Personal Property - 1
- Access to Medical Care – 1, which is a repeat deficiency
- Terminal Illness, Advanced Directives and Death – 3
- Security Inspection – 1, which is a repeat deficiency
- Tool Control - 1
- Sexual Abuse and Assault Prevention and Intervention - 1

### **Facility Snapshot/Description**

The Clinton County Correctional Facility is a [REDACTED] facility owned and operated by the Clinton County Board of Commissioners. [REDACTED]

[REDACTED] The facility has 107 surveillance cameras which are continuously monitored by central control officers. The facility is located in McElhattan, Pennsylvania approximately one hundred miles northwest of Harrisburg, 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-man 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, telephones, tables and a dedicated announcement/bulletin television which displays such information (English and Spanish) on a continuing 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 modified housing/special management unit has its own outdoor recreation area.

The atmosphere in the housing units was relaxed and detainees openly communicated with the inspection team and facility and ICE personnel. Staff interaction with detainees was informal and showed deference. Detainees were orderly throughout their daily movements and program/activity participation. The inspection team interviewed fifty-six LEP and English-speaking detainees publicly and privately in the housing unit and in the common areas. Some detainees were interviewed more than once. The three detainees that voiced a medical concern had their issues addressed with health care personnel by the medical SME. All of the detainees were seen by medical personnel during the inspection and were provided the proper follow-up care. Detainees registered no substantive complaints or concerns when



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questioned about their personal safety, conditions of confinement, treatment by staff, asylum requests, consulate/court access, telephone access, visiting privileges, law library access or food services.

Medical services are provided by Correct Care Solutions and food services are provided by Aramark. Maintenance services are provided by Clinton County employees. The facility maintains and represents acceptable sanitation.

**Areas of Concern/Significant Observations**

There were no areas of concern or significant observations.

**Recommended Rating and Justification**

The Lead Compliance Inspector recommends that the facility receive a rating of Acceptable. The facility complies with the ICE National Detention Standards (NDS). No (0) standards were found Deficient and three (3) standards were Not Applicable (N/A). All remaining thirty-six (36) standards were found to be in compliance.

**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 at the facility and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials – [Redacted]
- Facility Staff – [Redacted]  
[Redacted] and other administrative staff

[Redacted]

[Redacted], Lead Compliance Inspector

November 8, 2018

Printed Name of LCI

Date