



The Nakamoto Group, Inc.

August 26, 2021

TO: [REDACTED]
Acting Assistant Director Custody Management

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

SUBJECT: **Annual Inspection of the Hall County Department of Corrections**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS 2019) of the Hall County Department of Corrections in Grand Island, Nebraska during the period of August 24-26, 2021. This is an IGSA facility.

The 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]
Medical Care	[REDACTED]
Safety	[REDACTED]

Type of Inspection

This is an annual inspection which is performed to determine overall compliance with the ICE NDS for Over 72 hour facilities. The September 2020 (NDS 2000) inspection was rated Meets Standards.

Inspection Summary

The Hall County Department of Corrections 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 September 2020 and August 2021 annual compliance inspections:



The Nakamoto Group, Inc.

<i>September 2020 Annual Inspection</i>	
Meets Standard	37
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	2

<i>August 2021 Annual Inspection</i>	
Meets Standard	30
Does Not Meet Standard	1
Repeat Finding	0
Not Applicable	2

The inspection team identified seventy (70) deficient components in the following eighteen (18) standards:

- Transportation by Land – 1
- Admission and Release – 2
- Custody Classification – 1
- Facility Security and Control – 1
- Detainee Funds and Personal Property – 3
- Post Orders – 3
- Searches of Detainees – 7
- Special Management Housing Units – 5
- Staff Detainee Communication – 2
- Sexual Abuse and Assault Prevention - 2
- Disciplinary System – 3
- Hunger Strikes – 1
- Medical Care – 9
- Suicide Prevention and Intervention – 6
- Disability Identification, Assessment, and Accommodation – 18
- Telephone Access – 2
- Detainee Handbook – 2
- Grievance System – 2

Facility Snapshot/Description

The Hall County Department of Corrections (HCDC) was built in 2008 and is operated under the jurisdiction of the Hall County Board of Corrections. The facility is located in Grand Island, Nebraska approximately 95 miles west of Lincoln, Nebraska, the state capital. This IGSA [REDACTED] employs the direct and indirect model of supervision to all classification levels of male and female ICE detainees, U.S. Marshal Service (USMS), Bureau of Prisons (BOP), Hall County, and several surrounding counties. [REDACTED]

The facility is a single-story structure which contains nine general population housing units, a twelve-bed special management unit (SMU), and a four-bed medical unit. Two of the general population housing units are used for county work release non-ICE detainees. ICE detainees are commingled with other jurisdictions of same or similar custody classification levels. Celled housing is provided for medium-high to high custody level detainees, and open dormitory style housing is provided for medium-low to low custody level detainees. There was one detainee housed in the SMU under administrative segregation status at the time of inspection. Onsite inspectors found the ICE living units to be well lit with both natural and artificial light and observed adequate open space for detainees. The dayrooms are furnished with picnic style metal tables with attached seats for detainees to participate in leisure time activities and socializing. Televisions are available for detainees to view; however, board games, leisure reading material, and playing cards once provided by the facility have been



temporarily removed due to health concerns associated by the COVID-19 virus. Video visitation stations are available in each detainee housing units through use of the kiosks. The kiosks are also programmed for detainees to view the local handbook, communicate with ICE, file grievances, and order commissary items. Computer tablets are currently not available at this facility. Video visitation without charge is offered to visitors through video monitors that are installed in the lobby area of the facility. Video visitation for a fee is also offered to detainees and visitors through the detainee telephone provider. Non-contact legal visitation is available seven days per week to include weekends and holidays. Group religious services have been temporarily suspended due to health concerns associated with the COVID-19 virus. Other COVID-19 response operational changes include all newly received detainees have been quarantined upon admission to the facility. Detainees complaining of symptoms will be COVID-19 tested immediately. There are four indoor/outdoor recreation yards available to detainees one hour per day, seven days per week. ICE detainees do not participate in the voluntary work program.

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 staff were professional during interviews and detainees that agreed to be interviewed spoke willingly and respectfully. A review of sanitation inspection reports, interviews with staff and detainees, and observation of onsite inspectors concluded that the sanitation level of the facility was acceptable.

The inspection team interviewed or offered an interview to all twenty detainees housed at the facility during the inspection. Interviews were conducted by one inspector remotely, in person by onsite inspectors, and with the assistance of an interpreter when needed for LEP detainees. There were no substantive concerns voiced when asked about personal safety, access to telephones, or access to the law library. All detainees verified that memorandum, posters, and other type of key information are posted in English and Spanish throughout the facility which are the languages primarily spoken by detainees. While conducting formal interviews, several detainees stated that they did not receive a National Detainee Handbook prior to or upon admission to the facility. ICE personnel that were interviewed stated that detainees are provided a copy of the National Detainee Handbook before being transferred to the facility but acknowledgement of receipt of the handbook is maintained in the A-File. When asked by inspectors to provide copies of the acknowledgement, ICE personnel was unable to do so. In an effort to allow immediate access to all detainees, the administrative sergeant loaded an electronic version of the National Detainee Handbook to the kiosks which are available in all ICE housing units. Two detainees complained of bread being served with mold on it and spoiled milk being issued during the breakfast meal. The safety SME discussed the concerns with the administrative sergeant and inspected the area that bread and milk are stored. At the time of inspection, both items were properly stored and are distributed with a "first in, first out" system. A review of cooler temperatures over the inspection period found acceptable ranges for storing cold foods. During interpreter assisted LEP interviews, two detainees shared medical concerns. One female detainee complained of vision problems and the need for eye glasses, while the second detainee alleged that he is not receiving insulin on a regular schedule. Both concerns were brought to the attention of acting HSA by the medical SME. The acting HSA agreed to review the detainee's medical charts and meet with the detainees if necessary. Detainees were reminded of the proper procedures for filing grievances and the availability of the OIG hotline for submitting complaints.

Medical services are provided by Advanced Correctional Healthcare and the food service is provided by Summit Food Service Management, LLC. The facility does not charge co-pays for medical, mental health, or dental care. The detainee telephone system and kiosk is provided by Encartele Inc. who feature the CIDNET application.

Areas of Concern/Significant Observations

Except for the deficient standard mentioned below there were no areas of concern or significant observations from this hybrid inspection. Onsite inspection team members were provided all requested



The Nakamoto Group, Inc.

documentation and observed the practice and procedures of the facility. The two remote inspectors relied upon documentation and/or electronic medical chart review to validate observations and findings. There was one deficient standard discovered during the inspection.

Disability Identification, Assessment and Accommodation:

Policy: The detention standard protects against disability discrimination by ensuring that detainees have an equal opportunity to participate in, access, and enjoy the benefits of the facility's programs, services and activities.

Finding: The facility does not have a policy and process for Disability Identification, Assessment and Accommodations. This involves sixteen components.

The facility does not notify detainees of their right to Disability Identification, Assessment and Accommodations. This involves two components.

Recommendation: Develop a policy and process for Disability Identification, Assessment and Accommodations.

Develop a system to notify detainees of their right to Disability Identification, Assessment and Accommodations to include, but not limited to, notification in the inmate handbook, posters on the housing unit and medical unit bulletin boards, and notices in the orientation video.

Educate the detention and medical staff about Disability Identification, Assessment and Accommodations through orientation and annual training.

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 for Over 72-hour facilities. One (1) standard was rated as Does Not Meet Standard and two (2) standards were Not Applicable (N/A). All remaining thirty (30) 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 was conducted onsite and telephonically with facility staff and ICE representatives. In addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

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

[REDACTED], Lead Compliance Inspector

August 26, 2021

Printed Name of LCI

Date