March 3, 2022

TO:  
[redacted]  
Acting Assistant Director Custody Management

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

SUBJECT:  
90 Day Follow-Up/Annual Inspection of the Moshannon Valley Processing Center

The Nakamoto Group, Inc. performed a 90 Day Follow-Up/Annual inspection for compliance with the ICE Performance Based National Detention Standards (PBNDS 2011 with 2016 revisions) of the Moshannon Valley Processing Center in Philipsburg, Pennsylvania during the period of March 1-3, 2022. This is an IGSA.

The inspection was performed under the guidance of [redacted] Lead Compliance Inspector. Team Members were:

<table>
<thead>
<tr>
<th>Subject Matter Field</th>
<th>Team Member</th>
</tr>
</thead>
<tbody>
<tr>
<td>Detainee Rights</td>
<td></td>
</tr>
<tr>
<td>Security</td>
<td></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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</table>

**Type of Inspection**

This is a 90 day follow-up inspection which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72-hour facilities. A pre-occupancy inspection was conducted in July 2021.

**Inspection Summary**

The Moshannon Valley Processing Center 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 March 2022 90 day follow-up inspection:
### 2022 90 Day Follow-Up Inspection

<table>
<thead>
<tr>
<th>Category</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Meets Standards</td>
<td>42</td>
</tr>
<tr>
<td>Does Not Meet Standards</td>
<td>0</td>
</tr>
<tr>
<td>Repeat Finding</td>
<td>0</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>1</td>
</tr>
</tbody>
</table>

The inspection team identified one (1) deficient component in the following one (1) standard:

**Tool Control - 1**

### Facility Snapshot/Description

The Moshannon Valley Processing Center, formerly known as the Moshannon Valley Correctional Center, is located on the outskirts of Philipsburg, Pennsylvania. It is owned and operated by The GEO Group, Inc (GEO). The facility, constructed in [Year], has a total capacity of [Number] beds. The current contract is for [Number] beds. The facility houses adult male and female ICE detainees of all classification levels. On the first day of the inspection the total population was [Number], which included [Male] male and [Female] female ICE detainees.

The facility is a campus style single-level structure surrounded by a double, chain link security fence. The razor wire that topped the fence during the facility’s previous mission has been removed and replaced with climb resistant fencing material. The main building which houses administrative offices and the visitation area is connected to the building housing, the intake area, medical facility, and food service by a fenced walkway. There are [Number] housing units containing [Number] dormitory style pods. A separate building houses the [Number]-bed special management unit.

The facility has several areas designed for classrooms, craft rooms, law library, general library, and program areas. Indoor and outdoor recreation is offered. There is a large grassy area with picnic tables that is designated for outdoor visiting when the weather permits.

Each general population housing unit has a dayroom area equipped with tables, chairs, televisions, telephones, electronic tablets, board games, card games, and a sufficient number of showers and washbasins. Detainees housed in general population have access to outdoor recreation four hours per day, seven days a week. Detainees housed in the SMU have access to recreation and/or leisure time areas out of their cells four hours per day, seven days a week. General population detainees are permitted to participate in the voluntary work program outside of their housing unit.

In addition to access to telephones for communications, electronic tablets are provided in each housing unit and are available in the SMU. Detainees may use an electronic tablet to communicate with various facility and ICE staff, file a grievance, order commissary, and access various educational and gaming applications. For a fee, detainees may communicate with family and friends via email, engage in video visits, or download music and videos.

The facility has returned to social/general visitation in accordance with the ICE Phased Plan to Return to Social Visitation.
Inspectors working onsite visited the housing areas and noted that cleanliness throughout the facility was above average. All staff interviewed during the inspection were well versed in the requirements of the standards and in facility policy. Interaction between detainees and staff was observed to be cordial.

Seventeen detainees were formally interviewed in a private setting. None of the detainees voiced any substantive complaints. One female detainee voiced a concern regarding her safety based on a racial slur made by an officer during a conversation with another officer. The detainee sent a written complaint to the facility administrator. The inspector followed-up on the complaint and found that it had been handled by the facility administrator.

Twelve detainees were interviewed informally in a non-confidential setting. None of the detainees voiced any concerns. All of the detainees interviewed during the inspection stated that the telephones work, they are aware of the availability of the law library, and that they are provided the opportunity for outside recreation daily. None of the detainees had contacted the OIG nor had they filed a grievance.

Detainee telephone services are provided via the ICE contract with Talton Communications and commissary services are provided by Keeffe. All other services are provided by GEO staff. Detainees are not charged co-pay fees for medical, dental, or mental health services.

During the inspection, optimal compliance was found while reviewing the following standards: Admission and Release, Special Management Unit, Use of Force, Recreation, and Telephone Access. The facility is not currently accredited by ACA, NCCHC nor have they received PREA accreditation. All accreditations are required by their contract and the facility is in the process of obtaining them.

Due to COVID-19 this was a hybrid inspection with one inspector working remotely (Quality of Medical Care SME). The facility provided the remote inspector all requested documentation and information as evidence of practices and procedures within the facility. In addition to these materials, staff were interviewed by the inspection team. All staff interviewed were well versed in facility policy and the requirements of the standards and were responsive to all requests made by the inspection team.

The facility has developed a COVID-19 plan to address exposures/infections. During the inspection there were no staff or detainees that had tested positive for COVID-19.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations during this inspection.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards. The facility complies with the ICE National Detention Standards (PNBDS 2011) unless unobserved practices and conditions are contrary to what was reported to the inspection team. No (0) standards were found Does Not Meet Standard and one (1) standard was Not Applicable (N/A). All remaining forty-two (42) 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.
with one participating telephonically. In addition to the Nakamoto Group onsite inspectors, the following participated:

- ICE Officials –
- Facility Staff –

March 3, 2022
Lead Compliance Inspector       Date