April 14, 2021

TO:  
Assistant Director Custody Management

FROM:  
Lead Compliance Inspector  
The Nakamoto Group, Inc.

SUBJECT:  Annual Detention Inspection of the Orange County Correctional Facility

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS 2019) of the Orange County Correctional Facility in Goshen, New York during the period of April 12-14, 2021. This is an IGSA facility.

The annual inspection was performed under the guidance of Lead Compliance Inspector. Lead Compliance Inspector Cahill-Masching, Security SME Messick and Safety SME Robinson were on-site for the inspection. The remaining team members worked remotely. Team Members were:

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

This is a scheduled annual remote inspection which is performed to determine overall compliance with the ICE NDS 2019 for Over 72 hour facilities. The facility received a rating of Meets Standards during the October 2020 NDS 2019 annual inspection.

Inspection Summary

The Orange County Correctional Facility is currently accredited by:
- The American Correctional Association (ACA) – Yes
- The National Commission on Correctional Health Care (NCCHC) – Yes
- 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 NDS 2019 and 2021 NDS 2019 compliance annual inspections.
<table>
<thead>
<tr>
<th>2020 Annual Inspection</th>
<th>2021 Annual Inspection</th>
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<tbody>
<tr>
<td>Meets Standard</td>
<td>Meets Standard</td>
</tr>
<tr>
<td>31</td>
<td>31</td>
</tr>
<tr>
<td>Does Not Meet Standard</td>
<td>Does Not Meet Standard</td>
</tr>
<tr>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Repeat Finding</td>
<td>Repeat Finding</td>
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<tr>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
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The inspection team identified twenty-seven (27) deficient components in the following sixteen (16) standards:

- Admission and Release – 1
- Custody Classification – 1
- Detainee Funds and Personal Property – 1, which is a repeat deficiency
- Post Orders – 2
- Special Management Units – 3
- Food Service – 2
- Medical Care – 1
- Personal Hygiene – 1, which is a repeat deficiency
- Suicide Prevention and Intervention – 2
- Disability Identification, Assessment, and Accommodation – 5, all of which are repeat deficiencies
- Recreation – 1
- Telephone Access – 1
- Visitation – 1, which is a repeat deficiency
- Detainee Handbook – 2, one of which is a repeat deficiency
- Law Library and Legal Materials - 2
- Detainee Transfers - 1

Facility Snapshot/Description

The Orange County Correctional Facility is under the jurisdiction of the Orange County Sheriff’s Office and is located in the rural western outskirts of the Village of Goshen, New York. The facility houses male and female ICE detainees of all custody levels; male and female Orange County detainees; and male and female U.S. Marshal detainees. The direct supervision, single-story structure is encircled by two twelve-foot chain link perimeter fences supplemented with razor ribbon. There is a paved perimeter road around most of the compound that is patrolled by an armed officer 24 hours a day. There are over 300 surveillance cameras which provide visual observation of the critical movement and common areas inside the facility.

The facility has eighteen general population housing units. Fifteen living units are cell blocks and three are dormitories. ICE detainees are housed in two housing celled units. The one female ICE detainee is housed in a dormitory. ICE detainees are housed separately from other detainees. The day rooms are furnished with a television, telephones, and tables for eating and recreating. Each detainee has a personal property storage locker. Each general population housing unit has direct access to an outdoor recreation area which is available seven days a week during waking hours.

Twenty formal or informal detainee interviews were conducted. Three detainees volunteered to speak formally and confidentially to an inspector. The rest of the detainees spoke to the inspectors informally during tours of the dayrooms, volunteer work in the kitchen, and also during recreation. Two detainees expressed complaints regarding the medical department. The medical records were reviewed and the HSA was interviewed by the medical SME. Both detainees are undergoing treatment within standard protocols.
Several detainees stated that they did not like the food or the menu selection. However, there were also detainees that stated “the food was good”. The safety SME stated the menu was certified by a dietician, was diverse, the portion sizes were appropriate, and meals were served at the appropriate temperatures. Detainees working in the voluntary work program expressed no concerns and no grievances were filed regarding the voluntary work program. All detainees stated that communication with facility staff and ICE officers is readily available upon request. Detainees interviewed were asked if they were aware of the Office of Inspector General (OIG) hotline. One detainee responded in the negative and the security SME pointed out the directions on the bulletin board for contacting the OIG.

Staff were well-versed on the basic requirements of the standards as applicable to their areas and were professional in appearance and demeanor.

Medical services are provided by Wellpath. Food services are provided by the Trinity Corporation. All other services are provided by Orange County employees. There is no medical co-payment for ICE detainees.

Areas of Concern/Significant Observations

This inspection was conducted as a hybrid inspection, wherein three inspectors were on-site and two worked remotely. The results and findings, while accurately reported herein, are therefore potentially less thorough than an inspection conducted with the full inspection team on site.

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 Standard 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-324A 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 telephonically:

- ICE Officials –
- Facility Staff –

Nakamoto, Lead Compliance Inspector April 14, 2021

Printed Name of LCI Date