



The Nakamoto Group, Inc.

April 21, 2022

TO: [REDACTED]
Acting Assistant Director Custody Management

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

SUBJECT: **Biennial Detention Inspection of the Pike County Correctional Facility**

The Nakamoto Group, Inc. performed a biennial inspection for compliance with the ICE Performance Based National Detention Standards (PBNDS 2011) of the Pike County Correctional Facility in Lords Valley, Pennsylvania during the period of April 19-21, 2022. 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]
Safety	[REDACTED]
Medical Care	[REDACTED]

Type of Inspection

This is a scheduled biennial inspection which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72-hour facilities. The facility received a rating of Meets Standards during the April 2021 PBNDS 2008/PBNDS 2011 SA-API inspection.

Inspection Summary

The Pike County Correctional Facility is currently accredited by:

- The American Correctional Association (ACA) - No
- The National Commission on Correctional Health Care (NCCCHC) - 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 2021 and 2022 PBNDS annual compliance inspections:



<i>2021 Annual Inspection</i>		<i>2022 Annual Inspection</i>	
Meets Standards	39	Meets Standards	39
Does Not Meet Standards	0	Does Not Meet Standards	0
Repeat Finding	0	Repeat Finding	0
Not Applicable	2	Not Applicable	4

The inspection team identified ten (10) deficient components in the following six (6) standards:

- Funds and Personal Property - 1
- Special Management Units - 1
- Disciplinary System - 2
- Medical Care – 1
- Significant Self-Harm and Suicide Prevention and Intervention - 1
- Disability Identification, Assessment, and Accommodation - 4

Facility Snapshot/Description

The Pike County Correctional Facility is located in Lords Valley, Pennsylvania, approximately 85 miles northwest of the Newark Liberty International Airport. The facility is owned by Pike County and operates under the authority of the Pike County Prison Board. Pike County has an intergovernmental support agreement (IGSA) with Homeland Security, Immigration and Customs Enforcement (ICE). The facility has a capacity of 375 beds and houses all custody levels of adult male and female non-ICE detainees and male ICE detainees. [REDACTED]

The facility consists of three one-story buildings which include [REDACTED] separate detainee housing units, all with [REDACTED]. All housing units are monitored by direct supervision of an officer. ICE detainees are commingled with non-ICE detainees of compatible custody classification level.

The secure perimeter of the jail consists of exterior walls of the building supplemented by intermittent sections of twelve-foot fencing enhanced by razor ribbon on the top and bottom. These features combine to encircle the entire compound. Surveillance cameras give full perimeter coverage and are constantly watched by control center personnel. There is a paved perimeter road around the entire complex patrolled by an unarmed officer twice per shift.

The facility has four outdoor and two indoor recreation areas. Detainees in the general population are offered either indoor or outdoor recreation two hours per day, seven days per week. Housing areas provide dayroom space, adequate restroom facilities, and seating areas for their maximum occupancy. Televisions, law library computers, playing cards, board games, and kiosks for internal communication with facility and ICE staff are available in the dayrooms.

During this inspection, no less than 26 detainee interviews were conducted. Two special management unit (SMU) detainees were interviewed and 24 general population detainee interviews were conducted. Twelve detainees were interviewed formally and fourteen detainees were interviewed informally. Four limited English proficient (LEP) detainees who spoke Spanish only were interviewed by use of a telephonic interpretation service. Detainees interviewed had been at the facility between one month to 21



The Nakamoto Group, Inc.

months. All the detainees reported they had access to showers, recreation, law library, ICE/ERO staff, and telephones. A few of the detainees reported that the tablets did not function or shut down randomly. This was reported to senior facility staff. All of the detainees reported the facility was clean. All detainees reported they felt safe at the facility. Detainees reported they were able to send and receive mail. Detainees reported they received shoes and clothing upon admission and were able to exchange or get replacements easily. One detainee reported he was charged for a clean bed sheet. Upon follow-up it was determined he damaged the sheet issued to him and was sanctioned through a disciplinary hearing to pay for damages. The detainees reported they were treated fairly by staff and that staff were attentive to their needs. None of the detainees had made any reports to the Officer of Inspector General (OIG) and all were aware of the OIG hotline and the grievance system. No detainee expressed concerns related to physical safety. All the detainees expressed satisfaction with the quality and quantity of the food provided to them. All detainees interviewed stated they knew how to access both the National Detainee Handbook and the local supplement on the kiosks and electronic tablets. All detainees reported they received medical attention upon admission and had access to medical staff for any health issues. One detainee complained of an eye issue. It was determined by the health services administrator (HAS) that he had not submitted a sick call request; however, he was seen by medical that day. Another detainee voiced a concern that he received a billing invoice from an outside facility. This matter was also referred to the HSA.

The inspection team observed sanitation in all areas of the facility to be at an acceptable level.

Medical services are provided by PrimeCare Medical, Inc. Telephone services are provided by Global Tel Link (GTL). All other services are provided by Pike County employees. ICE detainees are not charged co-pays for medical, mental health, or dental care services.

Areas of Concern/Significant Observations

The facility achieves optimal compliance with the Admission and Release Standard as policy requires medical staff to observe any strip search of a transgender detainee. In the Use of Force Standard, optimal compliance is achieved as policy requires that all audio-visual records are retained for at least one year after conclusion of an investigation or litigation. The facility provides an optimal level of medical care as the facility provides adequate space and staffing for telepsychiatry. The facility achieves an optimal level of compliance with the Telephone Access Standard as it exceeds the ratio of one telephone per every ten detainees and specialized video equipment is available for deaf/hard of hearing detainees. The facility achieves optimal compliance with the Law Libraries and Legal Material Standard as detainees are afforded fifteen hours per week or more of access to the law library.

The inspection was conducted as a hybrid. Four inspectors were on-site; one inspector worked remotely. The remote inspector was unable to personally observe practices and procedures within the facility but was able to interview staff and review files. There were no areas of concern.

Recommended Rating and Justification

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards. The facility complies with the ICE Performance-Based National Detention Standards (PBNDS 2011). No (0) standards were found Does Not Meet Standards and four (4) standards were Not Applicable (N/A). All remaining thirty-nine (39) 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 at



The Nakamoto Group, Inc.

the facility. In addition to the entire Nakamoto Group, Inc. Inspection Team (one SME via conference call) the following were present:

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

[REDACTED]	Lead Compliance Inspector	April 21, 2022
Printed Name of LCI		Date