April 25, 2019

TO: [Redacted]
Assistant Director for Detention Management

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

SUBJECT: Annual Detention Inspection of the Pike County Correctional Facility

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2008/SAAPI 2011) of the Pike County Correctional Facility in Lords Valley, PA, during the period of April 23-25, 2019. This is an IGSA facility.

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>
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<tr>
<td>Detainee Rights</td>
<td>[Redacted]</td>
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<tr>
<td>Security</td>
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<tr>
<td>Medical Care</td>
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<tr>
<td>Safety</td>
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Type of Inspection

This is a scheduled annual inspection which is performed to determine overall compliance with the ICE PBNDS for Over 72 hour facilities. The facility received a previous rating of Meets Standards during the February 2018 annual 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 (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 2018 and the 2019 annual inspections:
The inspection team identified four (4) deficient components in the following four (4) standards:

- Searches of Detainees—1
- Sexual Abuse and Assault Prevention and Intervention—1, which is a repeat deficiency
- Food Service—1
- Detainee Handbook—1

**Facility Snapshot/Description**

The Pike County Correctional Facility is located in Lords Valley, PA, approximately 85 miles northwest of the Newark Liberty International Airport, Newark, NJ and approximately 140 miles north of Philadelphia, PA. The facility, constructed in 1995, is owned by Pike County and operates under the authority of the Pike County Prison Board. Pike County has an IGSA with Homeland Security ICE.

The facility is a one-story building consisting of three primary buildings in which are distributed eleven separate detainee housing units. All of the housing units are cell design and are under the direct supervision of an officer. Direct supervision by staff is supported by cameras in housing units and corridors. ICE detainees are commingled in housing units with non-ICE detainees.

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 monitored 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 communications with facility and ICE staff are available in the dayrooms.

The entire facility is climate controlled. Cleanliness and sanitation throughout the facility were observed to be very good.

All housing units and common areas of the facility were visited and/or observed during the inspection. Numerous detainees were interviewed; some interviews were in housing units or work areas with small groups of detainees and several were private and confidential and included detainees with limited English proficiency (LEP). Language line was used to facilitate the LEP interviews. Interviews included detainees who had recently arrived at the facility and some who had been housed at the facility for longer periods of
time. The detainees voiced no concerns regarding life/safety issues. Detainees stated they felt safe and were generally satisfied with the interaction, responsiveness and professionalism of facility and ICE staff and with access to medical services, mail, the law library, telephones, visitation and recreation. Detainees expressed general satisfaction with the quantity and quality of food provided. The most frequent concern voiced by detainees pertained to strip searches. In order to be eligible to participate in the voluntary work program on jobs outside their housing units, detainees must sign a consent form for an unclothed (strip) search and are subsequently subject to routine strip searches during the remainder of their stay at the facility.

Detainee telephone services are provided by Global Tel* Link Corporation; medical services are provided by PrimeCare Medical Inc.; and commissary services are provided via a contract with Keefe Group. All other services are provided by Pike County.

ICE detainees do not incur medical co-pays.

**Areas of Concern/Significant Observations**

During intake, an individual determination is made for each new arrival regarding reasonable suspicion for a strip search. Detainees are also asked to sign a consent form for an unclothed (strip) search. If a detainee consents, he may subsequently be subjected to strip searches without any further determination of reasonable suspicion for the remainder of his stay at the facility.

Additionally, any detainee who wants to participate in the voluntary work program on a job outside of his housing unit must sign the consent form for an unclothed (strip) search or he is considered ineligible to work outside the housing unit. The detainee is then subject to a strip search after each work shift before he returns to his housing unit and at any other time a supervisor determines that a strip search is necessary. Once a detainee signs a consent form for an unclothed (strip) search, an individual determination regarding reasonable belief or suspicion that contraband may be concealed on the person is not considered.

**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 2008 and PBNDS 2011 SAAP). No (0) standards were found Does Not Meet Standard and one (1) standard was Not Applicable (N/A). All remaining forty (40) standards were found to be in compliance.

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

- **ICE Officials** -
- **Facility Staff**