



The Nakamoto Group, Inc.

June 10, 2021

TO: [REDACTED]
Assistant Director Custody Management

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

SUBJECT: **Annual Inspection of the Plymouth County Correctional Facility**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE National Detention Standards (NDS) 2019 of the Plymouth County Correctional Facility in Plymouth, Massachusetts during the period of June 8-10, 2021. This is an IGSA.

The annual inspection was performed under the guidance of [REDACTED] Lead Compliance Inspector. Team members were:

Subject Matter Field	Team Member
Safety	[REDACTED]
Security	[REDACTED]
Medical Care	[REDACTED]
Detainee Rights	[REDACTED]
Medical Care	[REDACTED]

Type of Inspection

This is a scheduled annual inspection that 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 December 2020 annual inspection.

Inspection Summary

The Plymouth County Correctional Facility is currently accredited by:

- The American Correctional Association (ACA) - Yes
- 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 2020 and 2021 NDS annual inspections:



2020 Annual Inspection	
Meets Standards	32
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	1

2021 Annual Inspection	
Meets Standards	32
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	1

The inspection team identified four (4) deficient components in the following three (3) standards:

- Medical Care – 1
- Suicide Prevention and Intervention – 2
- Visitation - 1

Facility Snapshot/Description

The Plymouth County Correctional Facility is located 45 miles southeast of Boston on the Atlantic Ocean coast. The facility is owned by the Commonwealth of Massachusetts and operated under the jurisdiction of the Plymouth County Sheriff's Department [REDACTED]

[REDACTED] The remaining detainees were from the U.S. Marshal Service, the Massachusetts Department of Corrections, and Plymouth County and surrounding jurisdictions. The facility does not house females or juveniles. [REDACTED]

The facility was built in 1994. It is a stand-alone multi-storied facility that is surrounded by two fourteen-foot-high chain link fences supplemented with razor ribbon on top and bottom, and a movement detection system installed on the interior fence line. A paved perimeter road encircles the complex; it is patrolled by an armed canine officer at least once each shift. Surveillance cameras offer visibility around the entire perimeter, into the housing units and common areas, and interior movement corridors. All exterior building doors are under constant camera surveillance and are controlled by central control staff. The facility is equipped with a surveillance camera network that is monitored 24 hours a day.

The facility has nineteen individual housing units of which three are dedicated to ICE detainees. Thirteen of the general population housing units are two-tier design, which contain configurations of two-bed, four-bed, or five-bed cells. Five of the units are dormitory settings, which contain from 62-139 beds. There is one special management unit; it has seventy cells equipped with either one bed or two beds. There were three ICE detainees in the SMU during the inspection. The facility has dedicated sections of its housing units to serve as COVID-19 wings; there were no positive COVID-19 cases amongst the ICE detainee population during the inspection.

Each living area, except the SMU, has a common dayroom equipped with a television, fixed table/chair units for detainees to eat their meals, play games, and gather for conversation. There are no electronic tablets in the housing units. Each housing unit has two kiosks on which detainees can file grievances, order commissary, or view the LexisNexis law library collection. There are no video-visit stations in the housing units. All announcements and schedules are posted on the dayroom and common area bulletin boards. Detainees are provided daily indoor and outdoor recreation. Every ICE/ERO housing unit has a LexisNexis computer/work station in the unit.

The inspectors conducted sixteen confidential detainee interviews during the inspection; four required the use of a language line. The detainee's time of detention at the facility ranged from two



weeks to one year. There were no substantive complaints about their treatment by staff or other detainees. Most stated they felt safe in the facility. Overall cleanliness was rated as acceptable. There were no concerns raised about the accessibility of services or programs. ICE/ERO contact and responsiveness was not an issue. Most stated they saw the deportation officer in the housing units every week. Most had awareness of the law library but were not cognizant of OIC services; they were informed. Indoor/outdoor recreation times were sufficient. The three detainees that raised concerns regarding their medical treatment had their allegations discussed with the health services administrator by the medical SME. Proper treatment had either already been delivered or follow-up appointments were already scheduled. No further action was necessary. The general complaints about the food and lack of variety were discussed with the food service director by the safety SME. The food service department operates on a 35-day menu cycle and diversity is represented in the daily entrees. The menu has been reviewed and approved by a registered dietician as meeting the US RDA requirements for nutritional value and health for the facility population. No further action was required. Only ten grievances were filed during this inspection period; two were substantiate. There were no mail or telephone issues.

Only one special management unit detainees agreed to be interviewed; an interpreter was employed. The detainee is in disciplinary segregation status for a staff assault that occurred on March 15, 2021. The detainee was unhappy about everything and responded negatively, at great length, to all questions. His allegation that staff assaulted him is not supported by incident documentation or by staff interviews familiar with the event. All of his substantive allegations were discussed with the chief assistant deputy superintendent by the security SME. None of the claims held merit and were not worthy of any further discussion or intervention. The detainee will serve his time remaining in this county in segregation status until his deportation to the Dominican Republic in two weeks.

Medical services are provided by Correctional Psychiatric Services (CPS). Food service is contracted to Trinity Services Group. Maintenance operations are provided by Plymouth County employees. Detainee telephone services are provided by Securus Technologies. ICE detainees are not charged medical co-pays.

Areas of Concern/Significant Observations

This was a hybrid inspection in which some inspectors work remotely. Remote inspectors were unable to personally observe practices and procedures within the facility and relied upon photographs and/or videos to validate the observation of many standards. There were no areas of concern or significant observations.

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. No (0) standard was rated as Does Not Meet Standard and one (1) standard was Not Applicable (N/A). All remaining thirty-two (32) 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



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brief was conducted at the facility and 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	June 10, 2021
Printed Name of LCI		Date