



The Nakamoto Group, Inc.

June 23, 2022

TO: [REDACTED]
Acting 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 21-23, 2022. This is an IGSA.

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 annual 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 June 2021 NDS 2019 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 2021 and 2022 NDS 2019 annual compliance inspections:



2021 Annual Inspection		2022 Annual Inspection	
Meets Standards	32	Meets Standards	32
Does Not Meet Standards	0	Does Not Meet Standards	0
Repeat Finding	0	Repeat Finding	0
Not Applicable	1	Not Applicable	1

The inspection team identified three (3) deficient components in the following two (2) standards:

Hunger Strikes - 1

Suicide Prevention and Intervention - 2, both of which are repeat deficiencies

Facility Snapshot/Description

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

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.

The facility was built in [redacted]. 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 [redacted] individual housing units of which [redacted] are totally dedicated to housing ICE detainees. [redacted] of the general population housing units are [redacted]-tier design which contain configurations of [redacted]-bed, [redacted]-bed, or [redacted]-bed cells. [redacted] of the units are dormitory settings which contain from [redacted] to [redacted] beds. There is one special management unit; it has [redacted] cells equipped with either one bed or two beds. There were no ICE detainees in the SMU 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. Currently there are no electronic tablets in the housing units; however, the facility plans to put tablets in the units soon. Each housing unit has two kiosks on which detainees can 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 a room off the unit dayroom.

The inspectors conducted no less than 34 detainee interviews as part of the inspection. There were 23 formal interviews of which eleven were with LEP detainees by use of a language line interpretation service and a bilingual inspector. There were no substantive complaints about their treatment by staff or oth-



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er detainees. All detainees interviewed stated they felt safe in the facility. All detainees were familiar with the detainee grievance process but none had filed a grievance. 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 OIG services; they were informed. Indoor/outdoor recreation times were sufficient. There were no concerns voiced concerning detainee mail or telephone issues. Overall cleanliness was rated as acceptable by the team.

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, dental, or mental health co-pays.

Areas of Concern/Significant Observations

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 or significant observations.

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 (NDS 2019) unless unobserved practices and conditions are contrary to what was reported to the inspection team. No (0) standards were found Does Not Meet Standards 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 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 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

June 23, 2022

Printed Name of LCI

Date