



The Nakamoto Group, Inc.

January 13, 2021

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **180 Day Reinspection of the Seneca County Jail**

The Nakamoto Group, Inc. performed a 180 day reinspection for compliance with the ICE National Detention Standards (NDS) of the Seneca County Jail in Tiffin, Ohio, during the period of January 11-13, 2021. This inspection was conducted remotely due to the COVID-19 virus. 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] |
| Medical Care | [REDACTED] |
| Safety | [REDACTED] |

Type of Inspection

This is a scheduled annual/180 day reinspection which is performed to determine overall compliance with the ICE NDS for Over 72 hour facilities. The facility received a rating of Does Not Meet Standards during the October 2019 inspection.

Inspection Summary

The Seneca County Jail is currently accredited by:

- The American Correctional Association (ACA) - No
- The National Commission on Correctional Health Care (NCCHC) - No
- The Joint Commission (TJC) - No
- Prison Rape Elimination Act (PREA) - No

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 October 2019 annual inspection and 2021 annual/180 day reinspection:



| 2019 Annual Inspection | |
|-------------------------------|----|
| Meets Standard | 33 |
| Does Not Meet Standard | 3 |
| Repeat Finding | 0 |
| Not Applicable | 3 |

| 2021 180 Day Reinspection | |
|----------------------------------|----|
| Meets Standard | 37 |
| Does Not Meet Standard | 0 |
| Repeat Finding | 0 |
| Not Applicable | 2 |

The inspection team identified seven (7) deficient components in the following seven (7) standards:

- Correspondence and Other Mail - 1
- Funds and Personal Property – 1
- Visitation - 1
- Recreation - 1, which is a repeat finding
- Access to Medical Care - 1
- Special Management Unit (Disciplinary Segregation) - 1, which is a repeat finding
- Detainee Transfer - 1

Facility Snapshot/Description

The Seneca County Jail was opened in 1994 and is located in Tiffin, Ohio. The facility is owned by the County of Seneca and operated by the Seneca County Sheriff’s Department. The jail [REDACTED] employs direct and indirect model of supervision to all custody levels of adult male and female detainees for ICE and Seneca County inmates. [REDACTED]

ICE detainees are comingled in five of the eight independent housing units with populations of similar custody levels. One housing unit occupying detainees has sixteen cells with two beds each while the remaining ICE housing units are open dormitories ranging from 26 to sixty beds. The special management unit (SMU) has eight cells with four single occupancy cells and four double occupancy cells. Living units appear well lit with both natural and artificial light and have adequate open space for detainees. A housing unit floor plan and photographs of the housing units were provided for review. The dayrooms in each of the housing units are furnished with tables and chairs for detainees to participate in leisure time activities and socializing. The ICE liaison officer reported that board games, leisure reading material, playing cards, and televisions are among the amenities available to detainees. Computer tablets are available in the living units to assist detainees in communicating with family, ordering commissary items, and checking their account balances. The tablets are not programmed to submit electronic detainee requests to ICE. The facility provides two dedicated areas for detainee recreation. The outdoor recreation area is covered but equipped with screened openings that allow for natural light and fresh air to enter. Exercise in the outside recreation area is limited to walking and/or jogging. Indoor recreation areas are contained within each housing unit and equipped with stationary exercise equipment for detainee use. Detainees reported that they have daily access to indoor and outdoor recreational activities. General visitation and group religious services have been temporarily suspended due to health concerns associated with the COVID-19 virus. Visits from legal representatives have not been suspended. Other COVID-19 response operational changes include all newly received detainees have been quarantined and COVID-19 tested at a previous facility before entering the Seneca County Jail. The facility has arranged with the telephone provider to allow fifteen free minutes of weekly call time for detainees to maintain positive family ties in the absence of family visits.



The facility is reported to be climate controlled and appeared to be in good repair based on photographs reviewed by inspectors. All staff interviewed were well-versed in facility guidelines and operating procedures as well as the National Detention Standards. Officers and staff were professional during interviews and detainees spoke willingly and respectfully. A review of photographs, videos, sanitation inspection reports, and interviews with staff and detainees concluded that the sanitation level of the facility was acceptable.

The inspection team interviewed seventeen LEP and English-speaking detainees housed at the facility. Interviews were held telephonically and with the assistance of an interpreter when needed. There were no substantive concerns voiced when asked about their personal safety, treatment by staff, mail services, recreation programs, or access to ICE. Three detainees complained of receiving repetitive food items during the breakfast meal stating that cold cereal was served daily. The health and safety SME reviewed the menu and found that cold cereal is routinely served for breakfast, but a variety of flavors are available to choose from. Moreover, the menu is certified as nutritionally adequate by a dietician. One detainee expressed concerns regarding the repair or replacement of a mask for a CPAP machine. A review of the detainee's health record confirmed a delay of over three months in the detainee receiving a new or repaired mask. The request for repair/replacement of the mask was approved by the IHSC Field Medical Coordinator, but quotes from outside vendors were still pending. The administrative sergeant contacted the SDDO who agreed to look into the matter further. Interviews of detainees conducted by the security SME revealed that detainees were generally satisfied with the level of cleanliness throughout the facility, but complained of the cleanliness of the showers. The health and safety SME reviewed additional photographs of the showers, wash basins, and toilets which revealed that the sanitation levels in these areas were acceptable. All detainees interviewed verified that they received a local and National Detainee Handbook during the admission process. LEP detainees interviewed confirmed that facility memorandum, posters, and other types of key information are posted in English and Spanish throughout the facility.

Finally, all detainees that raised substantive complaints or concerns during the interviews were asked if they had submitted their concerns to the Office of Inspector General. No detainee reported that they had submitted their concerns beyond facility staff.

Food, medical, and maintenance services are provided by Seneca County personnel. The facility does not charge co-pays for medical, mental health, or dental care. The facility doctor, dentist, and mental health services are contracted with local providers.

Detainee telephone services are provided by PayTel Communications via contract with the facility. Computer tablets available in each of the detainee housing units are provided by Stellar Services.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations from this remote inspection. The inspection team relied upon photographs and/or videos to validate the observation of many standards.

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). No (0) standards were found Does Not Meet Standard and two (2) standards were Not Applicable (N/A). All remaining thirty-seven (37) standards were found to Meet Standards.

LCI Assurance Statement



The Nakamoto Group, Inc.

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 brief was conducted telephonically with facility staff and ICE representatives. In addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

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

[REDACTED]

[REDACTED], Lead Compliance Inspector
Printed Name of LCI

January 13, 2021
Date

[REDACTED]