May 13, 2021

TO:    Assistant Director Custody Management

FROM:  Lead Compliance Inspector
        The Nakamoto Group, Inc.

SUBJECT: Technical Assessment Review of the Krome North Service Processing Center

The Nakamoto Group, Inc. performed a Technical Assessment Review (TAR) for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 of the Krome North Service Processing Center in Miami, Florida during the period of May 11-13, 2021. This is an SPC.

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>
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<tr>
<td>Security</td>
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<tr>
<td>Medical Care</td>
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<td>Medical Care</td>
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<td>Safety</td>
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**Type of Inspection**

This is a Technical Assessment Review (TAR) which is performed to assess the compliance with the ICE PBNDS for Over 72-hour facilities. The facility received a Does Not Meet Standards rating during the February 2021 annual inspection.

**Inspection Summary**

The Krome North Service Processing Center is currently accredited by:
- The American Correctional Association (ACA) - Yes
- 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 February 2021 PBNDS annual inspection and the technical assessment review:
### 2021 Annual Inspection

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<table>
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<tbody>
<tr>
<td>Meets Standard</td>
<td>40</td>
</tr>
<tr>
<td>Does Not Meet Standard</td>
<td>1</td>
</tr>
<tr>
<td>Repeat Finding</td>
<td>0</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>2</td>
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There are two (2) components in the one standard listed below that have outstanding issues with compliance that will likely not be resolved for the next inspection:

Visitation – 2; which are both priority components

### Facility Snapshot/Description

The Krome North Processing Service Center was built in 1979 and upgraded in 2019. The facility is located in Miami, Florida and owned and operated by U.S. Immigration and Customs Enforcement. This SPC employs the direct model of supervision to all custody levels of adult male ICE detainees. Detainees occupy nine general population open dormitory style housing units. Housing assignments are based on same or similar custody levels. The facility also maintains a dedicated special management housing unit (SMU) containing 25 double-occupancy cells, a thirty-bed behavioral health unit, and a twenty-bed medical unit for patient treatment, isolation and/or medical observation. There were five ICE detainees in administrative or disciplinary segregation during the inspection. During this inspection, the facility was housing only medium-high and high custody classification level ICE detainees.

Medical care is provided by IHSC uniformed personnel. Food service and security is contracted with Akima Global Services (AGS). The facility does not charge co-pays for medical, mental health, or dental care. Detainee telephone services, tablets and video visit kiosks are provided by Talton Communications. Sanitation throughout the facility was observed by onsite inspectors as being above-average and the atmosphere was viewed as generally calm with no obvious indicators of tension.

### Areas of Concern/Significant Observations

During this assessment, the facility demonstrated optimal levels of compliance as described in the following standards: Admission and Release, Special Management Unit, Use of Force, Medical Care, Significant Self Harm and Suicide Prevention, Recreation, Telephone Access, and Law Libraries and Legal Materials. Details of optimal achievements have been documented in component comments and/or overall remarks of the applicable standard.

This assessment was conducted as a hybrid inspection with three inspectors on-site and two working remotely. The remote inspectors sometimes relied upon photographs and/or videos to validate the observation of their standards. During the previous inspection, the inspection team identified one deficient standard and 25 deficient components. During this T.A.R., two priority components in the Visitation Standard were found with outstanding compliance issues with no corrective action plan. Both component deficiencies resulted from general visitation being suspended since March 2020 due to health concerns associated with the COVID-19 virus. The facility offers video visitation for a fee, but no accommodation...
for no charge video visits. The facility advised that there was no immediate plan to resume non-contact general visitation. The standard and remaining components rated Does Not Meet Standards during the previous inspection were corrected prior to the assessment or the facility provided corrective action plans that should bring the deficiencies within standard requirements.

**Recommended Rating and Justification**

The facility is capable of receiving an overall rating of Meets Standards in a future inspection providing they continue the corrected practices and follow through with the action plans to which they have committed.

**LCI Assurance Statement**

The findings and actions resulting from this Technical Assessment Review (T.A.R.) are accurately and completely documented on the G-324A Inspection Form and are supported by documentation in the inspection file. Specific notations are made in the component remarks sections of the G324A regarding compliance as it applies to the component. In regards to the requirements of the standards that are not represented in the components, the action taken for the facility to comply with them, and the results of those actions, are annotated in the component comments or overall remarks of each standard. 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] Lead Compliance Inspector May 13, 2021
Printed Name of LCI Date