April 11, 2019

TO:  
Assistant Director for Detention Management

FROM:  
Lead Compliance Inspector  
The Nakamoto Group, Inc.

SUBJECT:  Annual Detention Inspection of the Florence SPC

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS) 2011 of the Florence Service Processing Center, Florence, Arizona during the period of April 9-11, 2019. This is an SPC.

The inspection was performed under the guidance of , Lead Compliance Inspector. Team members were:

<table>
<thead>
<tr>
<th>Subject Matter Field</th>
<th>Team Member</th>
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<tbody>
<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 scheduled annual inspection, which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72 hour facilities. The facility received a previous rating of Meets Standards during the April 2018 inspection.

Inspection Summary

The Florence 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 2018 and 2019 PBNDS 2011 compliance annual inspections:

<table>
<thead>
<tr>
<th>2018 Annual Inspection</th>
<th>2019 Annual Inspection</th>
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<tbody>
<tr>
<td>Meets Standards</td>
<td>Meets Standards</td>
</tr>
<tr>
<td>41</td>
<td>41</td>
</tr>
<tr>
<td>Does Not Meet Standards</td>
<td>Does Not Meet Standards</td>
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<tr>
<td>0</td>
<td>0</td>
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<tr>
<td>Repeat Finding</td>
<td>Repeat Finding</td>
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<tr>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Not Applicable</td>
<td>Not Applicable</td>
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<td>1</td>
<td>1</td>
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The team identified five (5) deficient components in the following two (2) standards:

Environmental Health and Safety – 1
Food Service – 4, one of which is a Priority component

Facility Snapshot/Description

The Florence Detention Center (FDC), a Service Processing Center (SPC) is a facility owned and operated by Immigration and Customs Enforcement. The facility is located in Florence, Arizona, Pinal County, midway between Phoenix and Tucson. General population housing consists of eight single-story dormitories. Detainees are situated in either 64-person direct supervision living units or 24-person indirect supervision living units. Each pod is staffed by contract security to include a control officer and a housing officer. There is also a special management unit with thirteen single cells. The FDC has a combined recreation yard, covered and uncovered, of approximately 32,000 square feet for all general population detainees. The covered portion of the recreation yard has a basketball court, a sand volleyball portion, a track and an open grass field used for soccer matches. Detainees were observed participating in soccer, exercise circuits, basketball, and volleyball. Intermural competitions are also available. Each housing unit has a dayroom area equipped with tables, chairs, televisions, board games and microwave ovens. The entire facility is climate controlled. Telephones are available at optimal levels and are located in the housing units and outdoor recreation area. Detainee uniforms and wristbands are color-coded according to classification. The FDC maintains three courtrooms for the Executive Office of Immigration Review (EOIR).

During the inspection, 61 chickenpox cohorts were housed in Alpha Unit. The inspection team found the atmosphere to be calm and absent any indicators of high stress levels. The facility cleanliness standards are above average. Noise levels are low and detainees were calm and polite. ICE officers and facility staff were observed to be professional in appearance and demeanor. Interactions observed between detainees and staff were relaxed, respectful, and courteous. No less than 140 detainees were interviewed during the inspection. Confidential interviews revealed no issues. Interviews with LEP detainees indicated that they have no problems accessing services or information. Without exception, detainees indicated that they felt safe. An interview was conducted with the detainee in disciplinary
special management unit. He understood the reason for his restricted housing status. Detainees revealed that ICE officers were “very helpful” and that detention officers “were respectful”. There were no issues with telephone, food, law library or medical services.

The facility does not charge co-pays for medical, mental health, or dental services. Health services are provided by IHSC or contracted through STGi. Asset Protection and Security Services provide security, food services and transportation services. Religious programs are contracted through Jesuit Refugee Services (JRS-USA). Maintenance operations are contracted out to Alutiiq.

Areas of Concern/Significant Observations

There was one Priority component that Does Not Meet Standards:

4.1 Food Service

Component #10 - Before and during the display, service and transportation of food, sanitary guidelines are observed, with hot foods maintained at a temperature of at least 140° F (120° F in food trays) and foods that require refrigeration maintained at 41° F or below.

Findings: On 4/9/2019, the temperature of the food on the serving line was not maintained at the appropriate temperature. Coleslaw temperature was observed to be at 48° F and the temperature of the gravy was 120° F. The standard requires that cold food be served at <41° F and hot food served at 140° F or above.

Recommendation: The facility should temp the food prior to placing on the serving line to ensure that hot and cold food temperatures are at the proper level. Once placed on the serving line, ensure items are covered to minimize temperature loss and that cold items are placed on ice or kept under refrigeration until plating.

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) 2011. No (0) standards were found Does Not Meet Standards and one (1) standard was Not Applicable (N/A). All remaining forty-one (41) standards were found to Meet Standards.

LCI Assurance Statement

The findings of Meets Standards and Does Not Meet Standards 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 –
• Contract Staff – [Redacted]
• ICE Monitors – [Redacted]

[Redacted], Lead Compliance Inspector
Printed Name of LCI

April 11, 2019
Date