



November 4, 2020

TO: [REDACTED]
Assistant Director for Detention Management

FROM: [REDACTED]
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 in Florence, Arizona during the period of November 2-4, 2020. This is an SPC.

The annual 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 inspection, which is performed to determine overall compliance with the ICE PBNDS 2011 for Over 72-hour facilities. The facility received a rating of Meets Standards during the April 2019 inspection.

Inspection Summary

The Florence SPC is currently accredited by:

- The American Correctional Association (ACA) - Yes
- The National Commission on Correctional Health Care (NCCCHC) - 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 2019 and 2020 PBNDS 2011 annual compliance inspections:



2019 Annual Inspection	
Meets Standards	41
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	1

2020 Annual Inspection	
Meets Standards	41
Does Not Meet Standards	0
Repeat Finding	0
Not Applicable	2

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

- Environmental Health and Safety – 1, which is a priority component
- Disability Identification, Assessment, and Accommodation – 1

Facility Snapshot/Description

The Florence Service Processing Center (SPC) is a [REDACTED] facility owned and operated by Immigration and Customs Enforcement. The facility, located in Florence, Arizona, houses male ICE detainees with low and medium-low classification designations. [REDACTED]

General population housing consists of eight single-story dormitories. Detainees are housed in either 64-person direct supervision living units or 24-person indirect supervision living units. Each unit is staffed by contract security to include a control officer and a housing officer. There is a special management unit with thirteen single cells. The facility has a large recreation yard, offering covered and uncovered areas of approximately 32,000 square feet for all general population detainees. There is a basketball court, a sand volleyball area, a running/walking track, and an open area with artificial grass used for soccer matches. Intramural competitions are available. Each housing unit has a dayroom area equipped with tables, chairs, televisions, board games, and microwave ovens. Vending machines are available for detainees. Telephones are available at optimal levels and are located in the housing units and outdoor recreation areas. Detainee wristbands and uniforms are color-coded according to classification. The facility maintains three courtrooms for the Executive Office of Immigration Review (EOIR).

During the inspection, 25 detainees were on cohort status due to COVID-19. One detainee had active COVID-19. Since April 3, 2020, 78 detainees have tested positive for COVID-19. The facility has instituted an aggressive sanitation program and sanitation throughout the facility was observed to be excellent. Detainees were observed to be relaxed and stated that everything was “good” when questioned by inspectors. Only six detainees volunteered to be interviewed confidentially. All stated they felt safe, were being treated well, and had no issues. Security staff was observed to be professional in appearance and demeanor and their interactions with the detainees were cordial.

Under normal conditions the facility offers contact visitation; however, due to COVID-19, all general visitation has been suspended. Detainees are provided with free telephone calls to stay in contact with family and friends. All detainees are provided free postage.

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



Areas of Concern/Significant Observations

Environmental Health and Safety – Priority Component Does Not Meet the Standard

Policy: Priority Component #14 – The facility has an approved fire prevention, control, and evacuation plan.

Finding: The current fire prevention, control, and evacuation plan has been approved by the facility administrative staff but has not been approved by the local fire authority. The latest fire inspection was conducted in October 2019. During that inspection, eight discrepancies were noted that required a follow-up inspection before the approval. The ICE safety officer and the SDDO provided documentation confirming that the required repairs have been completed and provided to the local fire authority. On 9/2/2020 the facility received a letter from the fire chief stating that due to Covid-19 restrictions, the fire department has developed an onsite self-checklist that the facility can complete and submit. Once submitted, the fire chief has indicated he will schedule an exterior site visit to confirm compliance.

Recommendation: The facility should complete and submit the onsite self-check list to the local fire authority to approve the fire prevention, control, and evacuation plan.

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 Standard and two (2) standards were Not Applicable (N/A). All remaining forty one (41) standards were found to be in compliance.

LCI Assurance Statement

The findings of compliance and non-compliance 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 Nakamoto Group Inspection Team, the following were present:

- ICE Officials – [Redacted]
- IHSC Staff – [Redacted]
- Contract Staff – [Redacted]

[Redacted]

[Redacted], Lead Compliance Inspector

November 4, 2020

Printed Name of LCI

Date

[Redacted]