



U.S. Department of Homeland Security

Immigration and Customs Enforcement

Office of Professional Responsibility

Inspections and Detention Oversight Division

Washington, DC 20536-5501

**Office of Detention Oversight
Compliance Inspection**

**Enforcement and Removal Operations
ERO Miami Field Office
Glades County Detention Center
Moore Haven, Florida**

June 8–11, 2015

**COMPLIANCE INSPECTION
for the
GLADES COUNTY DETENTION CENTER
MOORE HAVEN, FLORIDA**

TABLE OF CONTENTS

EXECUTIVE SUMMARY
 Overall Findings.....2
 Findings by National Detention Standard (NDS) 2000 Major Categories3

INSPECTION PROCESS4

DETAINEE RELATIONS5

INSPECTION FINDINGS

DETAINEE SERVICES
 Food Service6

SECURITY AND CONTROL
 Environmental Health and Safety6

HEALTH SERVICES
 Medical Care6

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EXECUTIVE SUMMARY

The Office of Detention Oversight (ODO) conducted a compliance inspection of the Glades County Detention Center (GCDC) in Moore Haven, Florida, from June 9 to 11, 2015.¹ GCDC opened in 2007 and is owned by Glades County Development Corporation and operated by the Glades County Sheriff's Office. Enforcement and Removal Operations (ERO) began housing detainees at HDC in 2007 pursuant to an Intergovernmental Service Agreement (IGSA), under the oversight of ERO's Field Office Director (FOD) in Miami, Florida.

ERO staff members are assigned to the facility. A Detention Services Manager is assigned to the facility. A Chief Sheriff's Deputy is responsible for oversight of daily facility operations and is supported by (b) (7) personnel. GCDC provides

Capacity and Population Statistics	Quantity
ICE Detainee Bed Capacity ²	300
Average ICE Detainee Population ³	89
Male Detainee Population (as of 06/9/2015)	28
Female Detainee Population (as of 06/09/15)	22

food services and Armor Correctional Medical Health Care provides medical services. The facility holds an accreditation with the National Commission on Correctional Health Care.

OVERALL FINDINGS

In October 2011, ODO conducted an inspection of GCDC under the National Detention Standards (NDS) 2000, reviewing the facility's compliance with 21 standards and finding the facility compliant with eight standards. There were a total of 20 deficiencies in the remaining 13 standards.

Inspection Results Compared	FY 2012 (NDS 2000)	FY2015 (NDS 2000)
Standards Reviewed	21	16
Deficient Standards	13	3
Overall Number of Deficiencies	20	5
Deficient Priority Components	N/A	N/A
Corrective Actions Initiated	0	0

In FY2015, ODO conducted an inspection of GCDC under the NDS 2000 (15 standards) and the Performance-Based National Detention Standards 2011 Sexual Abuse and Assault Prevention and Intervention (SAAPI)⁴ standard, reviewing the facility's compliance with 16 standards and finding the facility compliant with 13 standards. ODO found five deficiencies under the remaining three standards.⁵

¹ Male and female detainees with low, medium and high security classification levels are detained at the facility for longer than 72 hours.

² Data Source: ERO Facility List Report as of June 8, 2015.

³ Ibid.

⁴ The GCDC is contractually required to comply with the PBNDS 2011 for Sexual Abuse and Assault Prevention Intervention (SAAPI), as of October 23, 2012.

⁵ Corrective actions, where immediately implemented, best practices and ODO recommendations, as applicable, have been identified in the Inspection Findings section and annotated with a "C", "BP" or "R", respectively.

FINDINGS BY NDS 2000 MAJOR CATEGORIES

NDS 2000 STANDARDS INSPECTED ⁶	DEFICIENCIES
Part 1 – Detainee Services	
1. - Access to Legal Material	0
2. - Admission and Release	0
4. - Detainee Classification System	0
5. - Detainee Grievance Procedures	0
6. - Detainee Handbook	0
7. - Food Service	1
8. - Funds and Personal Property	0
15. - Staff-Detainee Communication	0
16. - Telephone Access	0
Sub-Total	1
Part 2 – Security and Control	
7. - Environmental Health and Safety	2
13 - Special Management Unit (Administrative)	0
14. - Special Management Unit (Disciplinary)	0
17. - Use of Force	0
Sub-Total	2
Part 3 – Health Services	
2. - Medical Care	2
3. - Suicide Prevention and Intervention	0
Sub-Total	2
PBNDS 2011 STANDARD INSPECTED	DEFICIENCIES
Part 4 – Safety	
2.11 - Sexual Abuse and Assault Prevention and Intervention	0
Sub-Total	0
Total Deficiencies	5

⁶ For greater detail on ODO's findings, see the *Inspection Findings* section of this report.

INSPECTION PROCESS

Every fiscal year, the Office of Detention Oversight (ODO), a unit within U.S. Immigration and Customs Enforcement's (ICE) Office of Professional Responsibility (OPR), conducts compliance inspections at detention facilities in which detainees are accommodated for periods in excess of 72 hours and with an average daily population greater than ten, to determine compliance with the applicable ICE National Detention Standards (NDS) 2000, the Performance-Based National Detention Standards (PBNDS) 2008 or 2011.

During the compliance inspection, ODO reviews each facility's compliance with those detention standards that directly affect detainee health, safety, and/or well-being.⁷ ODO then identifies as a "deficiency," any violation of written policy specifically linked to ICE detention standards, policies, or operational procedures. ODO will also highlight any deficiencies found involving those standards that ICE has designated with either the PBNDS 2008 or 2011 to be "priority components."⁸ ICE considers those components to be of critical importance, given their impact on facility security and/or the health and safety, legal rights, and quality of life of detainees in ICE custody.

Immediately following an inspection, ODO hosts a closeout briefing in person with both facility and ERO field office management to discuss their preliminary findings, which are summarized and provided to ERO in a preliminary findings report. Thereafter, ODO provides ERO with a final compliance inspection report to: (i) assist ERO in working with the facility to develop a corrective action plan to resolve identified deficiencies; and (ii) provide senior ICE and ERO leadership with an independent assessment of the overall state of ICE detention facilities. The reports enable senior agency leadership to make decisions on the most appropriate actions for individual detention facilities nationwide.

⁷ ODO reviews the facility's compliance with selected standards in their entirety.

⁸ Priority components have not been identified for the NDS.

DETAINEE RELATIONS

ODO interviewed 22 detainees, who volunteered to participate. None of the detainees made allegations of mistreatment, abuse, or discrimination. The majority of detainees reported being satisfied with facility services, with the exception of the complaints below:

- *SAAPI*: Two detainees alleged another detainee and a county inmate were in a sexual relationship with a staff member (both allegations named the same staff member).
 - o Action Taken: The detainee who was alleged to be in the relationship with the staff member was interviewed by ODO and denied allegations of a relationship. The names of the detainees making the allegations, the alleged staff member, the detainee and inmate alleged to be in the relationship were provided to ICE staff at the facility for immediate follow-up. ICE reported the allegation to the Joint Intake Center. The SAAPI notification and reporting requirements were met.

- *Telephone Access*: Seven detainees alleged the telephone rates were excessive.
 - o Action Taken: ODO reviewed the telephone rates for the facility and found the rates are in compliance with the revised rate caps for interstate calls from prisons established by the Federal Communications Commission, which took effect on February 11, 2014.

INSPECTION FINDINGS

DETAINEE SERVICES

FOOD SERVICE (FS)

During an interview with a supervisor from the food service staff and document review, it was determined detainee workers received medical clearance to work in food service; however, none of the Glades County employees had pre-employment physical examinations clearing them to work in a food service operation (**Deficiency FS-1⁹**).

SECURITY AND CONTROL

ENVIRONMENTAL HEALTH AND SAFETY (EH&S)

An interview with the safety manager and review of weekly basic fire/safety inspections revealed monthly safety inspections are not conducted (**Deficiency EH&S-1¹⁰**).

The emergency generator is tested for one hour and inspected weekly by the maintenance staff. Load testing is required annually per manufacturer guidelines, but documentation reflects the last test was conducted in July 2013 (**Deficiency EH&S-2¹¹**).

HEALTH SERVICES

MEDICAL CARE (MC)

The registered nurses (RNs) were trained in performing hands-on physical examinations by the physician; however, the medical record review found five of 25 health appraisals were not reviewed by the physician (**Deficiency MC-1¹²**).

Dental services are provided at the facility twice a month by (b) (7)(E) contract dentist and (b) (7)(E) contract dental assistant, but the dentist does not conduct initial dental screenings. Instead, a document review revealed, initial dental screenings are performed by RNs when conducting the health appraisal (**Deficiency MC-2¹³**).

⁹ "All food service personnel (both staff and detainee) shall receive a pre-employment medical examination." See ICE NDS 2000, Standard, Food Service, Section (III)(H)(3)(a).

¹⁰ "A qualified departmental staff member will conduct weekly fire and safety inspections; the maintenance (safety) staff will conduct monthly inspections." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(L)(2).

¹¹ "The emergency generator will also receive quarterly testing and servicing from an external generator-service company. Among other things, the technicians will check starting battery voltage, generator voltage and amperage output." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(O).

¹² "Health appraisals will be performed according to NCCHC and JCAHO standards." See ICE NDS 2000, Standard, Medical Care, Section (III)(D).

¹³ "An initial dental screening exam should be performed within 14 days of the detainee's arrival. If no on-site dentist is available, the initial dental screening may be performed by a physician, physician's assistant or nurse practitioner." See ICE NDS 2000, Standard, Environmental Health and Safety, Section (III)(E).