

August 23, 2018

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Monroe County Detention Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2008; PBNDS 2011 SA-API Standard) of the Monroe County Detention Center in Key West, FL, during the period of August 21-23, 2018. 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 inspection which is performed to determine overall compliance with the ICE PBNDS 2008 for Over 72 hour facilities. The facility received a previous rating of Meets Standards during the July 2017 inspection.

Inspection Summary

The Monroe County Detention 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) - 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 2017 and 2018 PBNDS 2008 annual compliance inspections:

<i>2017 Annual Inspection</i>	
Meets Standard	38
Does Not Meet Standard	0
At Risk	0
Repeat Finding	0
Not Applicable	3

<i>2018 Annual Inspection</i>	
Meets Standard	38
Does Not Meet Standard	0
At Risk	0
Repeat Finding	0
Not Applicable	3

The inspection team identified five (5) deficient components in the following four (4) standards:

Funds and Personal Property—1
Post Orders—1
Correspondence and Other Mail—1
Detainee Handbook—2

Facility Snapshot/Description

The Monroe County Detention Center is located on Stock Island in Key West, FL. The facility is owned by the Monroe County Public Works and Engineering Department and operated by the Monroe County Sheriff's Office. The Sheriff's Office has an IGSA with ICE. [REDACTED]

The facility, constructed in 1994, is a two-level structure on a stilted foundation due to the threat of hurricanes and tide surges in the area. Both dormitory beds and cells are available. However, all ICE detainees are housed in one 95 bed capacity, 48 cell housing unit with cells on each of two levels. All ICE detainees are classified as either high or medium high custody. ICE detainees are under direct supervision around the clock. The facility also has a restricted housing unit for both administrative and disciplinary segregation management. No ICE detainees were housed in segregation status during the inspection. [REDACTED]

The housing unit for ICE detainees has a dayroom equipped with two televisions; five telephones; various board games; kiosks for ordering commissary and accessing various documents related to either ICE or facility operations; and a ping-pong table. An outdoor recreation yard is connected to the housing unit and detainees are permitted free and frequent access throughout the day. The law library for ICE detainees is also connected to the housing unit and contains two computers equipped with LexisNexis which is available to detainees daily. The entire facility is climate controlled.

Each member of the inspection team made multiple visits to the ICE housing unit and numerous detainees were interviewed. All detainees had the opportunity to speak to a member of the Nakamoto team during the inspection. Several interviews were confidential and some were with detainees with limited English proficiency (LEP). The interviews with LEP detainees were facilitated via Language Line. The detainees voiced no concerns regarding life/safety issues. Detainees were generally satisfied with the interaction, responsiveness and professionalism of facility staff and with access to medical services, the law library, telephones and recreation. Several detainees complained about the quality and quantity of food. These concerns were reviewed by the Safety SME. The menus have been nutritionally analyzed, certified and approved by a registered dietitian. Portion sizes were observed during the lunch meal on 8/21/2018 and were found to be adequate. A review of records indicated meals are prepared utilizing approved recipes

and ingredients. The diverse population lends itself to different dietary preferences and may account for some of the criticisms about the meals that are prepared and served. A review of the menus indicated that the ethnic diversity of the facility has been considered when the menus were developed. The meals were observed to be prepared, plated and served within the proper time and temperature requirements.

Two detainees stated they are diabetic and complained that they are not receiving the proper diet. The Medical SME reviewed their files and found that a diabetic diet has been ordered. Another detainee stated he needed glasses but has not been able to obtain an appointment with an optometrist. The Medical SME reviewed this detainee's medical record and confirmed that he is scheduled to see the optometrist on 8/31/2018.

Sanitation throughout the facility was observed to be average. Overall, the atmosphere at the facility was generally calm with no obvious indicators of high stress.

Health services are provided via a contract with Correct Care Solutions. The facility does not charge co-pays for medical, mental health or dental care for ICE detainees. Detainee telephone services are provided through a contract with ICSolutions. Food service operations are contracted with Aramark.

Areas of Concern/Significant Observations

There were no areas of concern or significant observations.

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 2008; PBNDs 2011 SAAPI Standard). No (0) standards were found Does Not Meet Standard and three (3) standards were Not Applicable (N/A). All remaining thirty-eight (38) standards were found 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 and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials – [REDACTED] (all assigned to the compliance section with the Miami field office)

- Facility Staff – [REDACTED]

[REDACTED] and various other staff and supervisors

[Redacted]

pector

August 23, 2018

Printed Name of LCI

Date