

August 30, 2018

TO: [REDACTED]
Assistant Director for Detention Management

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

SUBJECT: **Annual Detention Inspection of the Central Arizona Florence Correctional Complex**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance-Based National Detention Standards (PBNDS 2008) of the Central Arizona Florence Correctional Complex in Florence, AZ, during the period of August 28-30, 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 August 2017 inspection.

Inspection Summary

The Central Arizona Florence Correctional Complex 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 2017 and 2018 annual inspections:

<i>2017 Annual Inspection</i>	
Meets Standards	39
Does Not Meet Standards	0
At Risk	0
Repeat Finding	0
Not Applicable	2

<i>2018 Annual Inspection</i>	
Meets Standards	39
Does Not Meet Standards	0
At Risk	0
Repeat Finding	0
Not Applicable	2

The inspection team identified five (5) deficient components in the following three (3) standards:

Personal Hygiene - 2

Detainee Handbook - 1

Grievance System – 2, one of which is a Priority component

Facility Snapshot/Description

The Central Arizona Florence Correctional Complex (CAFCC) is managed by Core Civic. The facility is located in Florence, Arizona which is sixty miles southeast of Phoenix, Arizona.

ICE detainees are housed separately and not mixed with other populations. The housing units contain a large dayroom area with metal tables and chairs. In each housing unit dayroom, detainees have access to television, telephones, movies, X-box, Play Station 4, board games, puzzles, cards and dominos. A recreation supervisor is responsible for the development and oversight of the recreation program. Recreation programs are diverse and are based on the needs and interests of the detainees. Outdoor recreational activities include basketball, handball, soccer and volleyball. Exercise stations and pull-up bars are provided. The atmosphere was relaxed and detainees were observed interacting with facility staff and other detainees. They approached the inspection team without hesitation.

The inspection team visited the housing units several times during the inspection to conduct group and confidential interviews. No detainees expressed any concerns about their safety. The telephonic translation line was used to conduct two confidential interviews. One interview was in Punjabi and one in Creole. Nineteen confidential interviews were conducted in Spanish by bilingual inspectors. The length of stay for these detainees ranged from one week to over one year. On average, they have been here for three months. None of these detainees have used the law library. They know that they have access to the law library, but they either have an attorney or are not appealing their case and want to be deported.

During the confidential and group interviews there were no concerns or issues expressed regarding relation or treatment by staff, access to telephones, visiting privileges, access to recreation, the law library or denial of any services. Detainees stated that the food served is often too bland and there is one meal that they do not like. One detainee complained that he had a dental problem that was not being addressed. The medical SME investigated his complaint and found that it was not valid.

The facility does not charge ICE detainees co-pays for medical, mental health or dental care. Health services are provided Core Civic and contract personnel. Food service is provided by Trinity Food Services. Sanitation was observed to be good throughout the facility.

Areas of Concern/Significant Observations

The inspection team identified one (1) deficient priority component:

Grievance System

Component #1- Each facility shall have written policy and procedures for a detainee grievance system that:

- Establishes a procedure for any detainee to file a formal grievance;
- Establishes a procedure to track or log all formal grievances;
- Establishes reasonable time limits for:
 - Processing, investigating, and responding to grievances, including medical grievances;
 - Convening a grievance committee (or actions of a single designated grievance officer) to review formal complaints; and
 - Providing written responses to detainees who filed formal grievances, including the basis for the decision.
- Ensures a procedure in which all medical grievances are received by the administrative health authority within 24 hours or the next business day;
- Establishes a special procedure for time-sensitive, emergency grievances;
- Ensures each grievance receives supervisory review;
- Provides at least one level of appeal;
- Includes guarantees against reprisal; and

Ensures information, advice, and directions are provided to detainees in a language or manner they can understand, or that interpretation/translation services are utilized. Illiterate, disabled, or non-English speaking detainees shall be provided additional assistance, upon request.

Finding: The written grievance policy only addresses procedures for non-medical grievances. The policy does not address the procedures for processing, investigating or responding to a medical grievance or that a medical grievance shall be received by the administrative health authority within 24 hours or the next business day.

Recommendation: Policy and procedures need to be developed to include medical grievances.

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 for Over 72 hour facilities. No (0) standards were found Does Not Meet Standards and two (2) standards were Not Applicable (N/A). All remaining thirty-nine (39) standards were found to Meet Standards.

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



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the facility and in addition to the entire Nakamoto Group, Inc. Inspection Team, the following were present:

- ICE Officials – [REDACTED]
- Facility Staff – [REDACTED] and numerous other facility staff

[REDACTED], Lead Compliance Inspector August 30, 2018

Printed Name of LCI Date