

November 5, 2020

TO: [REDACTED]  
Assistant Director for Detention Management

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

SUBJECT: **Annual Inspection of the La Palma Correctional Center**

The Nakamoto Group, Inc. performed an annual inspection for compliance with the ICE Performance Based National Detention Standards (PBNDS 2011 with 2016 revisions) of the La Palma Correctional Center in Eloy, Arizona, during the period of November 3-5, 2020. 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 2011 with 2016 revisions for Over 72 hour facilities. The facility received a previous rating of Meets Standards during the June 2019 annual inspection.

### **Inspection Summary**

The La Palma Correctional Center is currently accredited by:

- The American Correctional Association (ACA) – Yes
- The National Commission on Correctional Health Care (NCCHC) - No
- 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 2019 annual inspection and the 2020 annual compliance inspection:

<b>2019 Annual Inspection</b>	
Meets Standard	39
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	3

<b>2020 Annual Inspection</b>	
Meets Standard	40
Does Not Meet Standard	0
Repeat Finding	0
Not Applicable	3

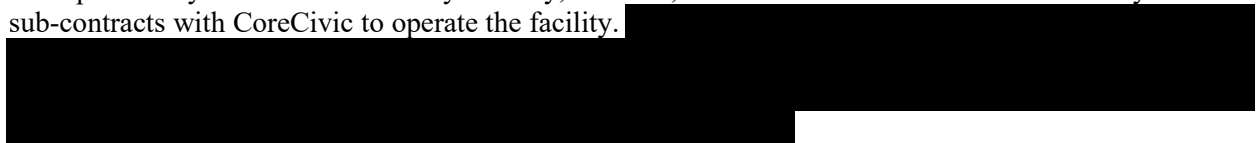
The inspection team identified three (3) deficient components in the following two (2) standards:

Sexual Abuse and Assault Prevention and Intervention - 1

Significant Self-Harm and Suicide Prevention and Intervention - 2

## Facility Snapshot/Description

The La Palma Correctional Center is located on a rural road in Eloy, Arizona, approximately sixty miles southeast of the Phoenix Sky Harbor International Airport. The facility, constructed in 2008, is owned and operated by CoreCivic. The City of Eloy, Arizona, has an IGSA with Homeland Security-ICE and sub-contracts with CoreCivic to operate the facility.



The facility is a large complex consisting of multiple buildings spread across three compounds. The administration building is located outside the secure perimeter. The visitation building and a building referred to as the “main” building, which houses receiving and discharge (R & D), the medical department and central control, are located immediately inside the secure perimeter. Three “compounds” separated by security gates and referred to as Compound 1, Compound 2 and Compound 3, contain the detainee housing units, recreation yards and programmatic offices. Each compound has detainee housing in three buildings which contain either three or four housing pods. Housing pods have a capacity of either sixty or 120 beds and are under direct supervision of an officer assigned inside the pod. Cameras are also located inside the housing pods and throughout the facility. Detainees are identified as either Eloy docket or Florence docket and are not housed together. During the inspection, Compound 2 was dedicated to Florence docket detainees; Compound 3 to Eloy docket detainees; and Compound 1 was split between the two dockets.

The facility provides nine outdoor recreation areas; three on each of the compounds. Detainees in the general population are afforded access to the recreation yards at least two hours per day, seven days per week. Dayrooms in each housing unit contain a combination pull-up bar/dip-bar device for exercise. Housing areas provide adequate dayroom space, restroom facilities, and seating areas for their maximum occupancy. Televisions, playing cards, board games, a monitor with Xbox games, kiosks for purchasing commissary items, and microwave ovens are available in the dayrooms.

The facility achieves optimum compliance with standards in two areas; recreation opportunities for detainees in disciplinary segregation and the required presence of medical personnel during transgender strip searches.

Pursuant to COVID-19 protocols, ICE suspended on-site general/social visitation at all ICE facilities in March 2020. Legal and professional visitation are exempt from this suspension. To mitigate the impact of the visitation suspension, ICE provides each detainee at the facility with thirteen, ten-minute telephone calls each week.

Sanitation was observed to be above average by the on-site safety SME.

Eighteen detainees were interviewed during the inspection; twelve by telephone with the remote inspection team members and six face-to-face with the on-site safety SME. Five of the interviews were with detainees with limited English proficiency. The telephonic interpreter service, Certified Languages International, was used for three of the interviews with the LEP detainees. Two of the detainees interviewed were transgender and two were housed in the segregation management unit. Detainees stated they were satisfied with the interaction, responsiveness, and professionalism of facility and ICE staff and with access to medical services, mail, the law library, telephones, visitation, and recreation. Detainees expressed general satisfaction with the quantity and quality of food provided.

Of the eighteen detainees interviewed, only one expressed any concerns related to their physical safety. One of two transgender detainees interviewed (anatomically male but identifies as female) stated she did not feel safe on her assigned housing unit. This issue was addressed with OIC who ordered the detainee to be reviewed by medical staff and unit management. A review of the medical file indicated that the transgender detainee was recently evaluated by a tele-health psychiatrist on 10/19/2020. She is prescribed medications for depression, anxiety, and nightmares. She is scheduled for a follow-up on 11/17/2020. However, the senior psychologist plans to evaluate her before the end of the week. Additionally, the acting chief of unit management interviewed the detainee before the conclusion of the inspection. Reportedly, when asked if she felt safe she responded that she did not. However, when the possibility of protective custody was explained to her she reportedly said she did not want to be assigned to protective custody status. Regarding her concerns about the showers, she was assured that when she showers during count all other detainees are secured in their cells. The detainee will also be permitted to use the law library when other detainees are not present.

Two of the LEP detainees voiced frustration in regard to communication issues; one detainee spoke Punjabi and another spoke Cantonese. Both stated they did not receive any written information in their languages. The detainee rights SME reviewed the detention file of the detainee who spoke Punjabi and found that he was issued a site-specific handbook in Punjabi. The local site-specific handbook is not available in Cantonese; however, the detainee did confirm that a telephonic interpreter service was used during intake and during his visits to the medical department. Staff interviewed during the inspection were aware that a telephonic interpreter service is available to them.

Detainee telephone services are provided by the Talton Communications, Inc.; medical services are provided by CoreCivic; and food service operations are contracted with Trinity Services Group.

ICE detainees do not incur medical co-pays.

### **Areas of Concern/Significant Observations**

This was a hybrid inspection; two inspectors were on-site and three worked remotely. Consequently, not all inspectors were able to personally observe practices and procedures within the facility. In addition to on-site observations, the inspection team also relied upon photographs and/or videos to validate the observation of many standards. Additionally, interviews were conducted with multiple key staff members.

### **Recommended Rating and Justification**

The Lead Compliance Inspector recommends that the facility receive a rating of Meets Standards unless unobserved practices and conditions are contrary to what was reported to the inspection team. The facility complies with the ICE Performance Based National Detention Standards (PBNDS 2011). No (0) standards were found Does Not Meet Standard and three (3) standards were Not Applicable (N/A). All remaining forty (40) 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. A telephone, call-in out brief was conducted. In addition to the entire Nakamoto Group, Inc. Inspection Team, there were several facility and ICE/ERO field office personnel who participated in the call:

- ICE Officials - [REDACTED]
- Facility Staff - [REDACTED]

[REDACTED]

[REDACTED], Lead Compliance Inspector

November 5, 2020

Printed Name of LCI

Date