

Summary of CRCL's Recommendations and ICE's Response Krome North Service Processing Center

On November 8, 2022, U.S. Immigration and Customs Enforement (ICE) responded to an Expert Recommendation Memorandum issued in July 2022 by the Office for Civil Rights and Civil Liberties (CRCL) that followed an onsite investigation at the Krome North Service Processing Center (Krome). ICE concurred with 20 recommendations, partially concurred with four, and non-concurred with nine.

Background

Between April and October 2021, CRCL opened five complaints involving noncitizens in ICE custody at Krome. The allegations raised concerns related to discrimination on account of race and religion, COVID-19 protocols, suicide prevention and intervention, and sexual abuse and assault prevention. As a result of these complaints, CRCL conducted a multidisciplinary investigation at Krome in December 2021 to examine the facility's operations and assess issues raising civil rights and civil liberties concerns.

Findings and Recommendations

On July 11, 2022, CRCL issued ICE an Expert Recommendation Memorandum based on its investigation conducted with the assistance of contract subject matter experts. The memo included 33 recommendations in the general areas of conditions of detention, medical care, mental health care, and environmental health and safety. The following highlights the top three findings and actions that ICE agreed to take as a result of CRCL's recommendations.

Suicide Prevention

CRCL determined that the facility does not have access to cut down tools to respond to suicide attempts. CRCL also found that Krome does not have structured suicide watch treatment plans. ICE agreed to research the availability of a cut down tool and will develop the necessary protocols. In addition, the facility's Behavioral Health Unit created a Suicide Risk Structured Treatment Plan form, which includes follow-up risk assessments for individuals on suicide precautions.

Timely Medical Care

CRCL found that the facility did not always promptly address medical complaints in a timely manner, delayed treating some serious medical conditions, had a lag between intake screening and provider visits, and lacked timely medication administration. ICE agreed to improve its tracking of medical complaints and to implement a tracking system that would help provide expedited evaluation and prompt referrals for serious medical issues. The facility hired two Advanced Practice Providers to help with post-intake delays and methods to expedite medication distribution.

Grievances

CRCL found that Krome does not maintain English translation of grievances in a noncitizens' file. CRCL also reviewed a grievance response that lacked critical information and did not comply with applicable detention standards. ICE agreed and distributed a directive advising the Grievance Officer to retain English versions of grievances to the noncitizens' file. ICE also conducted staff training on appropriately responding to grievances.

CRCL provides the public with documents related to complaint investigations. After it is prepared and reviewed, CRCL will post a redacted version of this Expert Recommendation Memorandum *on our* <u>website</u> that will contain additional information about the complaint investigation and CRCL's findings and recommendations.