



Office for Civil Rights and Civil Liberties

Summary of CRCL's Recommendations and ICE's Response *Richwood Correctional Center*

On December 15, 2021, U.S. Immigration and Customs Enforcement (ICE) responded to an *Expert Recommendation Memorandum* issued in September 2020 by the Office for Civil Rights and Civil Liberties (CRCL) that followed an onsite investigation at the Richwood Correctional Center (Richwood). ICE concurred with 53 recommendations, partially concurred with 17, and non-concurred with 13.

Background

Between August and October 2019, CRCL opened two complaints involving noncitizens in ICE custody at Richwood. The allegations raised concerns related to suicide prevention and intervention, use of force, and segregation. As a result of these complaints, CRCL conducted a multidisciplinary onsite investigation at Richwood in February 2020 to examine the facility's operations and assess issues raising civil rights and civil liberties concerns.

Findings and Recommendations

On September 24, 2020, CRCL issued ICE an *Expert Recommendation Memorandum* based on its investigation conducted with the assistance of contract subject matter experts. The memo includes 83 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 Richwood staff lacked training and knowledge on suicide prevention standards. ICE agreed that all facility staff would receive training on suicide prevention policies. Related to these concerns, ICE updated the suicide watch template to better explain the clinical rationale for placing a noncitizen on or off suicide watch. Further, ICE agreed to modify the suicide watch policy to include a clear definition and implications for monitoring noncitizens.

Use of Force

CRCL found that Richwood was not maintaining use of force records and did not timely review use of force incidents. CRCL also found that although Richwood had use of force policies, Richwood had failed to implement the policies. ICE agreed to conduct a critical incident review of use of force incidents and take corrective actions as needed.

Language Access

CRCL determined that Richwood did not have a language access policy and facility staff were unaware of how to use telephonic interpreter services. ICE agreed to provide training to all facility staff on language access policies and procedures, including how to use telephonic interpreter services.

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 [website](#) that will contain additional information about the complaint investigation and CRCL's findings and recommendations.

March 4, 2024