



**Homeland
Security**

December 8, 2022

MEMORANDUM FOR: Tae D. Johnson
Acting Director
U.S. Immigration and Customs Enforcement

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FROM: Dana Salvano-Dunn (b) (6)
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Susan Mathias /s/
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Prairieland Detention Center
Complaint Nos. 18-07-ICE-0750, 20-06-ICE-0476, 18-04-ICE-0771,
18-11-ICE-0773, 20-06-ICE-0484, and 20-07-ICE-0700

This memorandum concludes the investigation the Office for Civil Rights and Civil Liberties (CRCL) conducted into allegations related to U.S. Immigration and Customs Enforcement (ICE) detainees at the Prairieland Detention Center (PDC) in Alvarado, Texas. Following a collaborative process between CRCL and ICE, CRCL is closing the above-listed complaints.

Background

From September 8-10, 2020, CRCL conducted an onsite investigation at the PDC, accompanied by three subject matter experts in the areas of medical care, environmental health and safety, and conditions of detention. On March 30, 2021, CRCL provided ICE with an Expert Recommendation Memorandum, which contained 21 recommendations, along with the experts' written reports. On September 7, 2021, ICE responded to the recommendations, concurring with 16, partially concurring with 4, and non-concurring with one.

Analysis

Concurrences

CRCL appreciates ICE's consideration of CRCL's recommendations. The following examples highlight several of the positive changes that stemmed from the 21 concurrences.

Continuous Quality Improvement (Recommendation Nos. 1-2)

The implementation of Continuous Quality Improvement Plan ensures facility medical staff is assessing compliance with its hypertension and keep on person (KOP) protocols.

COVID-19 Protocols (Recommendations Nos. 4-6)

Updating the facility's COVID-19 policy is a positive change, as it ensures PDC is administering the most current COVID-19 protocols and ensures all staff are trained/educated on these changes.

Off-Site Medical Log (Recommendations No. 10)

CRCL commends PDC for swiftly making changes to the off-site medical referral log. Updating the off-site medical log to incorporate an initial date of referral ensures timeliness of appointments for dental, optometry, orthopedics, medical subspecialties, and other health care services.

Partial Concurrences

CRCL also would like to highlight positive changes that resulted from ICE's two partial concurrences.

Expansion of Mental Health Program (No. 14)

While ICE partially concurred with the recommendation to expand its mental health program, noting that it is not required by the PBNDS 2011, CRCL is pleased that PDC is expanding the services offered by their mental health program. Specifically, offering detainees services to assist with coping skills, life skills, parenting classes, anger management, and alcohol/narcotics anonymous.

Language Line use during Intake and Orientation (No. 18)

While ICE partially concurred with the recommendation to document the use of the language line during intake and orientation, noting that it is not required by the PBNDS 2011, CRCL can report that PDC confirmed it will document language line use. This ensures that limited English proficient detainees at PDC can report any concerns or risks and are clear on the rules and regulations of the facility.

Non-Concurrences

ICE non-concurred with one (1) recommendation, and CRCL has carefully reviewed ICE's response for the non-concurrence. Although CRCL believes this recommendation remains important, after assessing the response to the non-concurrence, CRCL considers this response to be sufficient.

(b) (5)

Conclusion

CRCL appreciates ICE's efforts to address CRCL's recommendations and recognizes the changes ICE has already enacted. CRCL is satisfied with ICE's overall response and is closing the complaints related to this investigation of PDC. CRCL will continue to monitor new information related to PDC in light of the findings and recommendations made related to the onsite investigation.

It is CRCL's statutory role to advise Department leadership and personnel about civil rights and civil liberties issues. Accordingly, CRCL may in the future review ICE's implementation of any of the recommendations discussed in this memorandum and will notify ICE of any plans to do so. If you have any questions, please contact the Director of the Compliance Branch, Dana Salvano-Dunn, at (b) (6) or (b) (6).

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