



# Office for Civil Rights and Civil Liberties

## Summary of CRCL's Recommendations and ICE's Response *Allen Parish Public Safety Complex*

On October 10, 2023, U.S. Immigration and Customs Enforcement (ICE) responded to an Expert Recommendation Memorandum issued in June 2023 by the Office for Civil Rights and Civil Liberties (CRCL) that followed a multidisciplinary onsite investigation at the Allen Parish Public Safety Complex (Allen Parish). ICE concurred with seven recommendations, partially concurred with five, and non-concurred with 44.

### Background

As part of CRCL's broader investigation into the detention oversight practices within ICE's New Orleans Area of Responsibility, CRCL conducted four virtual, multidisciplinary onsite investigations, including at Allen Parish. The allegations related to Allen Parish included abusive treatment of peaceful hunger strikers, improper imposition of solitary confinement, racial discrimination of black noncitizens, unsanitary conditions, and field office staff falsifying documents. As a result of these complaints, CRCL conducted an onsite investigation at Allen Parish in January 2022 to examine the facility's operations and assess issues raising civil rights and civil liberties concerns.

### Findings and Recommendations

On June 9, 2023, CRCL issued ICE an Expert Recommendation Memorandum based on its investigation conducted with the assistance of contract subject matter experts. The memo includes 56 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.

#### **Mental Health Staff Scope of Practice**

CRCL found the facility's licensed professional counselor (LPC) was operating beyond the scope of his license, including recommending psychotropic medications as part of patient treatment plans. ICE took corrective measures to ensure the LPC was operating within scope of practice and that the medical provider, and not the LPC, would evaluate and prescribe medication, as appropriate.

#### **Mental Health Clinical Supervision**

CRCL found that Allen Parish's LPC was not subject to ongoing clinical supervision, including regular mental health record reviews by mental health leadership. ICE agreed to ensure clinical supervision and/or peer reviews are conducted for the LPC by seeking appropriate licensed mental health peers in the community or alternatively employed by the Allen Parish Sheriff's Department.

#### **SAAPI/PREA**

CRCL found that Allen Parish's Sexual Abuse and Assault Prevention and Intervention and Prison Rape Elimination Act screening instrument did not address prior sexual victimization or criminal convictions for sex offenses. ICE agreed to develop and implement a revised screening form to include questions on prior victimization and criminal convictions.

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*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.*

February 8, 2024