



March 10, 2022

MEMORANDUM FOR: Corey A. Price
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SUBJECT: Jackson Parish Correctional Center
Expert Recommendations
Complaint Nos. 000101-21-ICE, 000102-21-ICE,
and 000890-21-ICE

The U.S. Department of Homeland Security (DHS), Office for Civil Rights and Civil Liberties (CRCL) conducted a virtual onsite investigation into conditions of detention for U.S. Immigration and Customs Enforcement (ICE) detainees at the Jackson Parish Correctional Center (Jackson Parish) in Jonesboro, Louisiana on December 13, 15, and 17, 2021.

We greatly appreciate the cooperation and assistance provided by ICE and Jackson Parish personnel before and during the review. As part of the review, CRCL engaged the assistance of four subject-matter experts in the following areas: medical care, mental health care, conditions of detention, and environmental health and safety. As a result of detainee and staff interviews, document reviews, and direct observation, the subject-matter experts identified concerns in these four areas.

On December 17, 2021, as part of the out-briefing for Jackson Parish, CRCL and the subject-matter experts discussed our preliminary findings with ICE Enforcement and Removal Office (ERO) field office management personnel, personnel from ICE ERO headquarters, and Jackson Parish management. During these discussions, the subject-matter experts provided recommendations to address some of the major concerns identified. Additionally, shortly following the out-briefing, CRCL sent an email to ICE on January 14, 2022, summarizing these initial recommendations, to ensure ICE had sufficient information to initiate the proposed changes.

Enclosed with this memorandum are the reports prepared by our subject-matter experts.¹ They have been divided into priority and best practices recommendations. Priority recommendations are listed in the body of this memorandum, and CRCL requests that ICE formally concur or non-concur with these recommendations and provide an implementation plan for all accepted recommendations. The best practices recommendations are contained in a separate attachment to this memorandum. Although CRCL is not requesting formal responses to these, we encourage ICE to consider and implement these recommendations to the fullest extent possible.²

With this memorandum, and consistent with our standard practice, we request that ICE indicate whether it concurs with the expert recommendations, and that for those agreed to, ICE provide an action plan within 60 days.

CRCL's medical and mental health experts made the following priority recommendations regarding mental health care at Jackson Parish. The medical recommendations all relate to the PBNDS 2011 4.3 Medical Care Standard, which requires access to appropriate and necessary mental health care:

Medical Care

Sick Call

1. (b) (5) [Redacted]
[Redacted]
[Redacted]
(b) (5) [Redacted]
[Redacted]
[Redacted]

(b) (5) [Redacted]

[Redacted]
[Redacted]

- [Redacted]
[Redacted]
[Redacted]
- [Redacted]
[Redacted]
- [Redacted]
[Redacted]
[Redacted]

¹ In general, CRCL's experts relied on the applicable Performance Based National Detention Standards (PBNDS 2011) and related professional standards in conducting their work and preparing their reports and recommendations.

² CRCL's experts also provided best practice recommendations, which may be found in their respective reports.

Recommendations related to the above findings are listed below:

2. CRCL recommends that Jackson Parish include management of the facility's infection prevention and control efforts, including implementation of the facility's COVID-19 response, in its quarterly multidisciplinary QI meetings and document this oversight in meeting minutes.
3. CRCL recommends that Jackson Parish assign specific infection prevention and control duties to one or more health care staff to monitor implementation of the facility's COVID-19 response.
4. (b) (5) [REDACTED]

Quality Improvement (QI):

5. A detained individual's medical record was misfiled in another detained individual's medical record, a finding previously identified in other Jackson Parish investigations. This can potentially compromise the confidentiality of a detained individual's medical record. Therefore, CRCL recommends that Jackson Parish multi-disciplinary QI Committee conduct (1) a QI study to assess the medical record department processes that have resulted in recurrent misfiling of patient records. (4.3 Medical Care (V) (BB) (2), Confidentiality and Release of Medical Records)
6. A medical record review of a Jackson Parish complainant (I.N., referenced in Medical Expert report, page 6), who had a known history of high blood pressure and had been previously placed on suicide watch, indicated that the nursing assessment of the detained individual after a use of force was inadequate. The evaluating nurse should have either documented normalization of the detainee's abnormal vital signs or consulted with the on-call provider for guidance on managing a patient with unstable vital signs, following a use of force incident. Therefore, CRCL recommends that the multidisciplinary QI Committee evaluate this emergency response incident to determine if additional training, amended nurse protocols or other corrective actions are warranted as part of the quality improvement process. (4.3 Medical care (V) (A) (2), Access to Medically Necessary and Appropriate Services and Medical Care).
7. Nursing staff did not report to a clinician that a detained individual missed multiple doses of a hypertension medication that may have led to a hypertension emergency. Certain medications present significant health risks even after missing a single dose. CRCL recommends that the Chief Medical Authority (CMA) provide written policy on the need for clinician notification when specific medications are missed or refused, even after a single dose. (4.3 Medical Care (V) (G) (7), Pharmaceutical Management)
8. Using the instance noted above, CRCL recommends that the nurse manager ensure that all nurses administering medications are provided training in the event a detained individual misses their medication. Monitoring of missed medication doses should be included in Medication

Administration Records (MAR) audits and tracked by the multi-disciplinary QI Committee. (4.3 Medical Care (V) (G) (7), Pharmaceutical Management)

- 9. (b) (5) [Redacted]

Mental Health Care

Medical Records

10. Currently, Jackson Parish’s medical records are not available for review by tele-psych staff because the records are not electronic. CRCL recommends that Jackson Parish develop a process to ensure access for direct review of the full record by the tele-psych provider. For example, Jackson Parish can scan and upload the record in PDF format to send to the tele-psych staff. (4.3. Medical Care, V, BB Medical Records, 1. Health Care File)

Therapeutic Services

CRCL found that Jackson Parish’s therapeutic services for ICE detainees are minimal and clinical supervision was lacking. Therefore, CRCL is recommending the following:

- 11. (b) (5) [Redacted]

12. CRCL recommends that Jackson Parish ensure ongoing clinical supervision of the mental health staff, including the tele-psych provider, including regular documentation reviews by mental health leadership. (4.3, Medical Care, O. Mental Health Program)

- 13. (b) (5) [Redacted]

14. As medical needs arise during tele-psych contacts, CRCL recommends that Jackson Parish ensure provider-to-provider referrals. (4.3. Medical Care, O. Mental Health Program)

15. (b) (5) [Redacted]

16. Several detained individuals indicated that they are unaware of their prescribed psychiatric medications. Therefore, CRCL recommends that Jackson Parish staff provide detainees with verbal and written information regarding psychiatric medications in a language they understand.

Sick Call

17. (b) (5) [Redacted]

Mental Health Documentation

18. (b) (5) [Redacted]

Significant Self-Harm and Suicide Prevention and Intervention

19. (b) (5) [Redacted]

20. (b) (5) [Redacted]

21. (b) (5) [Redacted]

(b) (5)

22. When CRCL asked Jackson Parish staff about intervening with an individual engaging in self-injurious behavior, various and different responses were provided. This lack of clarification indicated a need for staff training. CRCL recommends that Jackson Parish ensures that all staff receive required suicide prevention training as required by 2011 PBNDS. (4.6 Significant Self-Harm and Suicide Prevention and Intervention Section V. Expected Practices)
23. CRCL noted that the documentation of observation during suicide watch are pre-filled (e.g., 6:00, 6:15, 6:30, etc.) instead of left blank requiring real-time documentation at staggered time intervals. CRCL recommends that Jackson Parish ensure that documentation of suicide watch observation occurs at staggered intervals not to exceed 15 minutes and that facility staff are trained on documenting suicide watch observation and facility leadership conduct regular audits of the practice to ensure compliance with timely documentation and address issues with staff accordingly. (4.6 Significant Self-Harm and Suicide Prevention and Intervention Section V. Expected Practices)

CRCL observed that detainees on suicide watch are always placed on one-to-one observation and provided with a security smock, security mattress and finger food. The door is left open, thus the custodial officer assigned to observe the detainee has full view of the detainee. But unfortunately, as the rooms are on a main hallway, others passing by the cell, including other detainees, have full view of the detainee on suicide watch. Therefore, CRCL is recommending that Jackson Parish:

24. (b) (5)

25. Ensure detainee privacy and confidentiality while on suicide watch. (4.6 Significant Self-Harm and Suicide Prevention and Intervention, F. Housing and Monitoring)

Segregation

26. Staff reported that detainees are evaluated by mental health upon placement into segregation and assessed on a regular basis during segregation, however, this was shown not to be documented and thus could not be verified. CRCL recommends Jackson Parish document when mental health staff evaluation prior to disciplinary segregation placement. (2.12. Special Management Unit, P. Health Care)

Conditions of Detention

CRCL's conditions of detention expert made the following priority recommendations related to general conditions of detention at Jackson Parish in accordance with PBNDS 2011 (Revised 2016):

Use of Force

27. During a use of force incident, a review of the documents provided to CRCL revealed that the Jackson Parish staff supervising the calculated use of force did not contact medical staff prior to the calculated use of force, as required by the PBNDS 2011. CRCL recommends that Jackson Parish receive additional training on calculated use of force procedures. (2.15 Use of Force and Restraints, B. Principles Governing the Use of Force and Application of Restraints)

28. During staff interviews, CRCL was informed that Jackson Parish does not have staff trained to wear and use protective equipment required for calculated use of force incidents. Calculated use of force requires team techniques that usually involve five or more trained staff members clothed in protective gear, including helmet with face shield, jumpsuit, stab-resistant vest, gloves, and forearm protectors. Therefore, CRCL recommends that Jackson Parish staff provide specialized training to qualified staff to wear and use protective equipment required for calculated use of force incidents. (2.15 Use of Force and Restraints I. Calculated Use of Force and/or Application of Restraints)

Language Access

29. (b) (5) [REDACTED]
[REDACTED]
[REDACTED] CRCL recommends Jackson Parish develop and implement procedures to ensure all LEP detainees receive facility information, including the detainee handbook, and orientation in a language or manner they understand as required by PBNDS 2011. Additionally, Jackson Parish should ensure the interpretative services provided are properly documented. (2.1. Admission and Release; 2.13. Staff Detainee Communication. II. Expected Outcomes, Language Access. DHS Language Access Plan, and the ICE Language Access Plan, issued on June 14, 2015)

Staff-Detainee Communication

30. (b) (5) [REDACTED]
[REDACTED]
[REDACTED] CRCL recommends that Jackson Parish posts a schedule when ICE staff will be available in the housing units to be contacted by detainees. The posted schedule should be updated quarterly or more frequently as necessary to reflect changes in ICE/ERO personnel. (2.13 Staff-Detainee Communication, V. Expected Practices)

Grievances

31. (b) (5) [Redacted]

32. Additionally, CRCL recommends that Jackson Parish establish a procedure to track or log all ICE detainee grievances separately from other facility. (6.2 Grievance System, Section V. Expected Practices)

Law Library and Legal Materials

33. (b) (5) [Redacted]

Sexual Abuse and Assault Prevention Intervention (SAAPI)/Prison Rape Elimination Act (PREA)

34. (b) (5) [Redacted]

35. Jackson Parish staff performing PREA duties seemed to have minimal training and was not familiar with the duties of the PREA Coordinator position, including utilization of PREA screening information and follow up for detainees meeting at risk criteria. CRCL recommends that the PREA Coordinator receive additional PREA training on the duties and responsibilities of the position. (2.11 Sexual Abuse and Assault Prevention and Intervention, E. Staff Training)

COVID-19

36. The Jackson Parish Front Lobby Officer Post Order does not include the COVID-19 screening procedures for employees, contractors, and visitors. CRCL recommends Jackson Parish revise the Front Lobby Officer Post Order to include the COVID-19 screening procedures for employees, contractors, and visitors. (ERO PRR Version 7.0)

Environmental Health and Safety

CRCL's environmental health and safety expert made the following priority recommendation related to requirements in accordance with PBNDS 2011:

37. CRCL observed several places where floors in the kitchen area are in disrepair, with tiles missing. CRCL recommends Jackson Parish assess the condition of the floors in the kitchen. All areas where the floors are in disrepair, i.e., cracks, holes, tiles missing should be repaired as soon as possible to allow for proper cleaning of all floor areas and to ensure a safe working environment, reducing the possibility of staff/detainee slip/fall injuries. (4.1. Food Service, J. Safety and Sanitation)
38. The Food Service Administrator (FSA) was not knowledgeable of the required chemical concentration or water temperature for sanitizing purposes in the three-compartment sink. The FSA should implement a procedure for the use of the three-compartment sink and ensure that kitchen staff members are properly trained. (4.1. Food Service. J. Safety and Sanitation)
39. CRCL noted that the laundry at Jackson Parish is not weighed before it is placed in the machines and the facility does not have a scale available to weigh laundry. (b) (5) [REDACTED]
[REDACTED]
[REDACTED]
40. When requested, Jackson Parish was not able to provide an established menu for therapeutic diets and diabetic diets. CRCL recommends that the FSA and the dietitian establish menus based on the therapeutic and diabetic needs that have been determined. The menu(s) can be based on the regular diet menu with appropriate substitutions in food items, portions sizes, etc. Consideration should be given to including fresh fruit on the menus. Lastly, the dietitian should complete a nutritional analysis of the menus and make any necessary adjustment(s) before the menus are incorporated into the food service program. (4.1. Food Service, H. Medical Diets)
41. A comparison of several meals over the 5-week menu cycle between the regular menu and the vegetarian/common-fare menus shows that protein intake is reduced on the vegetarian/common-fare menus when compared to the regular menu. In addition, in most cases, carbohydrates were increased, fiber was increased, and calories were reduced on the vegetarian/common-fare menus when compared with the regular menu. CRCL recommends the FSA meet with the dietitian and complete a full review of the vegetarian/common-fare menus to ensure that nutritional values and caloric content across all menus are being met. (4.1 Food Service. G. Religious/Special Diets)
42. CRCL observed that the facility does not have all the Safety Data Sheets (SDS) for chemicals used in the laundry or the kitchen area. CRCL recommends that Jackson Parish staff ensure that they have SDS available in all areas where chemicals are utilized, and the most recent SDS for each chemical is available. (1.2. Environmental Health and Safety, B. Hazardous Materials)
43. Staff and detained individuals were not formally training on the use of chemicals. For security and safety purposes, CRCL recommends that the Jackson Parish facility administrator ensures

that adequate provisions are made for staff and detainee safety, to include formal training on the use of chemicals. (1.2. Environmental Health and Safety, V. Expected Practices)

44. CRCL was informed that the detained individuals retrieve ice with a cup from the ice coolers, located in the housing units. Allowing detained individuals to utilize a cup that can also be used for drinking beverages is an unsanitary practice and can lead to contamination of the ice. CRCL recommends that Jackson Parish purchase ice scoops for dispensing the ice, along with an ice scoop storage caddy that can be hung on the wall in each housing unit to hold the ice scoop. Ice scoops cannot be stored inside of the chest cooler with the ice. The ice scoop should be cleaned and sanitized at least once per day, and whenever it appears dirty or is dropped on the floor, etc. Alternately, Jackson Parish can install ice dispensing equipment in each housing unit. (4.1 Food Service. D. Food Service Dining Room/Satellite Meals Operations)
45. In housing units L and M, CRCL observed multiple sleeping bunks had rust on the bunk brackets and both inside and outside of the drawers under the bunks. Rust that accumulates on metals can weaken and deteriorate the metal, result in holes in the metal, and even cause the metal to fail. In addition, rust stains fabrics and can stain surfaces. Rust can also be irritating to the skin, and the powdery dust formed from rust can be irritating to the eyes and lung. Bunks with excessive rusting may not be safe to support the bunk and weight and may need to be replaced if the metal has deteriorated. CRCL recommends that Jackson Parish inspects the sleeping bunks to ensure that the metal has not been weakened by the rust or can be scrubbed and painted. Regular inspections and preventive maintenance of bunks should be performed to ensure rusting metal is addressed in a safe and effective manner. (1.2. Environmental Health and Safety, V. Expected Practices)
46. (b) (5)
[REDACTED]
47. After several staff interviews, CRCL noted that Jackson Parish staff are not familiar with the proper procedure for cleaning up a bodily fluid spill. Failure to utilize appropriate materials/supplies and follow proper procedures for the clean-up creates the potential for exposure to infectious materials, spread of bacteria/viruses, and/or exposure to disease. CRCL recommends that Jackson Parish ensures they have spill kits available in accordance with the PBNDS 2011. Specific procedures for clean-up of bodily fluids must be followed, and appropriate personal protective equipment (PPE) must be worn. Staff should be trained in the use of spill kits, so they are well versed in their use and proper clean-up procedures in case a clean-up of bodily fluids becomes necessary. (1.2. Environmental Health and Safety, D. Medical Operation)
48. Several detained individuals told CRCL that they launder their personal clothing items inside of the housing unit with bathing soap/shampoo and drying them on their bed. Washing laundry, especially personal clothing items with bathing soap/shampoo is an unsanitary and improper

laundering practice. Bathing soap/shampoo are not designed for the purpose of washing fabrics or textiles, and it does not contain any sanitizing properties for fabrics. CRCL recommends that Jackson Parish ensure detainees are educated on the importance of laundering clothing and personal items properly, and why self-laundering is an unsanitary and unsafe practice and ensure the detained individuals discontinue this practice. (4.5. Personal Hygiene, V. Expected Practices)

49. CRCL observed that Jackson Parish does not have a written policy/procedure for the issuance and the wearing of face masks. Information varied considerably from both staff and detainees when asked questions about face mask requirements and issuance. Additionally, staff reported wearing various types of masks (N-95, surgical, and cloth) when transporting detained individuals with tuberculosis and COVID-19. Per Jackson Parish administration, staff are supposed to always wear face masks inside of the facility, however, CRCL observed instances when staff did not wear their face masks. CRCL recommends that Jackson Parish establish a policy/procedure for face masks for both detainees and staff. The policy/procedure should establish clear requirements for wearing face masks while adhering to Center for Disease Control's (CD) guidelines as much as possible. (CDC's *Interim Guidance on Management of Coronavirus Disease 2019 (COVID-19) in Correctional and Detention Facilities*)

The complete expert findings and recommendations are contained in the enclosed expert reports.

It is CRCL's statutory role to advise department leadership and personnel about civil rights and civil liberties issues, ensuring respect for civil rights and civil liberties in policy decisions and implementation of those decisions. We look forward to working with ICE to determine the best way to resolve these complaints. We request that ICE provide a response to CRCL 60 days whether it concurs or does not concur with these recommendations. If you concur, please include an action plan. Please send your response and any questions to (b) (6)

Enclosures

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