



Homeland
Security

March 18, 2022

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

Kerry E. Doyle
Principal Legal Advisor
Office of the Principal Legal Advisor
U.S. Immigration and Customs Enforcement

FROM: Dana Salvano-Dunn (b) (6)
Director, Compliance Branch
Office for Civil Rights and Civil Liberties

Susan Mathias /s/
Assistant General Counsel, Legal Counsel Division
Office of the General Counsel

SUBJECT: Close Memorandum Regarding Visitation at
Robert A. Deyton Detention Facility
Complaint No. 19-02-ICE-0204

Purpose

This memorandum concludes the investigation the Office for Civil Rights and Civil Liberties (CRCL) conducted into allegations that the visitation policy at the Robert A. Deyton Detention Facility (RADDF) denied U.S. Immigration and Customs Enforcement (ICE) detainees their full rights to visitation.

Background

On September 8, 2021, CRCL issued a Recommendation Memorandum to ICE following an investigation of CRCL Complaint No. 19-02-ICE-0204. CRCL found that the visitation policy at RADDF violated the 2000 National Detention Standards (NDS), which was the standard that CRCL believes applied at the time of the complaint, and also found that RADDF provided significantly less visitation time for female detainees. CRCL also concluded that ICE's lack of a direct contractual relationship at RADDF impeded ICE's ability to require facility compliance with relevant detention standards for ICE detainees.

As a result of the findings, CRCL issued ICE four recommendations. On September 23, 2021, ICE responded, non-concurring with all four recommendations.

Analysis

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(b) (5) [Redacted text block]

Conclusion

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. While CRCL continues to have concerns, CRCL is closing this complaint. CRCL, however, will continue to monitor allegations regarding the visitation policy at RADDf and ICE’s reliance on USMS contracts. If you have any questions, please contact the Director of the Compliance Branch, Dana Salvano-Dunn, at (b) (6) [Redacted] or (b) (6) [Redacted].

¹ CRCL also notes that the visitation hours detailed in the RADDf Policy and Procedural Manual do not match the hours on ICE’s web site. This may cause confusion for detainees and visitors scheduling visitation.

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