



Office for Civil Rights and Civil Liberties

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

On July 19, 2021, U.S. Immigration and Customs Enforcement (ICE) responded to an *Expert Recommendation Memorandum* issued in December 2019 by the Office for Civil Rights and Civil Liberties (CRCL) that followed an onsite investigation at the Calhoun County Correctional Center (Calhoun). ICE concurred with 13 recommendations, partially concurred with six, and non-concurred with 21.

Background

Between March and December 2018, CRCL opened three complaint investigations involving noncitizens in ICE custody at Calhoun. The allegations raised concerns related to use of force, specialty medical care, medication administration, and environmental conditions at the facility. As a result of these complaints, CRCL conducted a multidisciplinary investigation at Calhoun in June 2019 to examine the facility's operations and assess issues raising civil rights and civil liberties concerns.

Findings and Recommendations

On December 11, 2019, CRCL issued ICE an *Expert Recommendation Memorandum* based on its investigation conducted with the assistance of contract subject matter experts. The memo included 40 recommendations in the 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.

Use of Force

CRCL determined that Calhoun did not convene an After-Action Review (AAR) Team to review and evaluate each use of force incident. ICE agreed to create an AAR Team for use of force incidents.

Language Access

CRCL determined that the facility neither translated the grievance forms into Spanish nor utilized telephonic interpreter services routinely. ICE agreed to provide grievance forms in Spanish and add contact information for telephonic interpreter services onto all housing unit staff phones. ICE ERO also notified noncitizens of the availability of interpreter services that can be used free of charge. Calhoun further agreed to remind all staff of the availability of telephonic interpreter services.

Clinical Documentation

CRCL found that mental health records were generally incomplete and failed to properly document clinical rationales for overriding suicide risk indicators. Mental health staff also did not review documentation for referrals. ICE agreed that Calhoun would employ a continuous quality improvement program to find areas of improvement with documentation. ICE further agreed that nurses will refer noncitizens to mental health staff for evaluation rather than override suicide risk indicators. Additionally, ICE agreed that Calhoun's mental health staff should review the reasons for referrals to ensure noncitizens are properly triaged and evaluated.

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.

September 20, 2023