



Office for Civil Rights and Civil Liberties

Summary of CRCL's Recommendations and ICE's Response *Seneca County Jail*

On November 24, 2023, U.S. Immigration and Customs Enforcement (ICE) responded to an Onsite Recommendation Memorandum issued in April 2023 by the Office for Civil Rights and Civil Liberties (CRCL) that followed a multidisciplinary onsite investigation of the Seneca County Jail (Seneca). ICE concurred with 13 recommendations, partially concurred with eight, and non-concurred with 43.

Background

Between October 2020 and April 2021, CRCL received more than 25 separate allegations and opened 17 complaint investigations involving noncitizens in ICE custody at Seneca. The allegations raised concerns related to excessive uses of force, medical and mental health care, dental care, environmental health concerns, and COVID-19 protocols. As a result of these complaints, CRCL conducted a multidisciplinary onsite investigation at Seneca in July 2022, with additional follow-up virtually in September 2022, to examine the facility's operations and assess issues raising civil rights and civil liberties concerns.

Findings and Recommendations

On April 18, 2023, CRCL issued ICE an Onsite Recommendation Memorandum based on its investigation conducted with the assistance of contract subject matter experts. The memo includes 64 recommendations in the areas of medical care, mental health care, conditions of detention, 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.

Sick Call

CRCL determined that there were issues with the facility's sick call process, including a failure by staff to properly log sick call slips and document responses, that resulted in significant delays in sick call responses. ICE agreed and developed a new form capturing all sick call requests and responses to comply with the governing National Detention Standards 2019. The facility also created a new sick call request form that includes a disposition response and is returned to the noncitizen within 24 hours. Finally, the facility improved its triage process to ensure patients are seen based on severity of need.

Medical Records

CRCL found the facility's medical records were only in paper, were disorganized, and lacked key documentation regarding patient care, including physician signatures for prescriptions and higher-level care. ICE agreed and created a new organization system for the paper files and uploaded the last five years of files into a digital database. The facility is now testing to implement an electronic medical record system. The facility also agreed to provide additional training on medical record keeping and instituted a Continuous Quality Improvement program to identify ongoing deficiencies in medical care.

Preventive Gynecological Care

CRCL determined that female noncitizens detained at the facility were not receiving routine preventive care, including gynecological exams, pap smears and breast exams. Pursuant to CRCL's recommendations, ICE agreed to secure a contract with a local obstetrician/gynecologist to provide appropriate care.

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