



# Office for Civil Rights and Civil Liberties

## Summary of CRCL's Recommendations and ICE's Response *Richwood Correctional Center*

On October 12, 2021, U.S. Immigration and Customs Enforcement (ICE) responded to an *Expert Recommendation Memorandum* issued in January 2021 by the Office for Civil Rights and Civil Liberties (CRCL) that followed a virtual onsite investigation at the Richwood Correctional Center (Richwood). ICE concurred with 51 recommendations and non-concurred with four.

### Background

In July 2020, CRCL opened a complaint involving noncitizens in ICE custody at Richwood. The allegations raised concerns related to COVID-19 protocols. As a result of this complaint, CRCL conducted targeted investigations at Richwood in September and October 2020 focused on the facility's policies and procedures related to COVID-19.

### Findings and Recommendations

On January 28, 2021, CRCL issued ICE an *Expert Recommendation Memorandum* based on its investigation conducted with the assistance of contract subject matter experts. The memo included 55 recommendations in the general areas of conditions of detention, medical 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.

#### **COVID-19 Training**

CRCL determined that Richwood staff was unfamiliar with the ICE COVID-19 Pandemic Response Requirements (PRR). CRCL also found that noncitizens and staff were not provided guidance or training on pandemic prevention and preparedness. ICE agreed to update facility staff regarding the requirements of the PRR via emails and meetings. ICE further agreed to develop a COVID-19 education program for noncitizens and staff; and in September 2021, the facility implemented monthly townhall meetings with noncitizens to provide COVID-19 information.

#### **Noncitizen Transfers**

CRCL found that facility staff was unfamiliar with guidance on COVID-19 mitigation efforts for transfers, releases, and removals. ICE agreed to provide the COVID-19 Transfer, Removal, and Release checklist to the facility and ensure that medical staff complete the checklist prior to any transfers, releases, and removals.

#### **Inmates and Noncitizens Comingling**

CRCL determined that Louisiana Department of Corrections inmates cleaned and performed maintenance in noncitizen housing areas. This contact between housing units increased the risk of COVID-19 spreading throughout the facility. ICE agreed to prevent comingling of inmates and noncitizens. As of October 28, 2020, inmates were no longer housed at Richwood.

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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.*

March 4, 2024