



Office for Civil Rights and Civil Liberties

Summary of CRCL's Recommendations and ICE's Response *Disability Issues at Boone County Jail*

On February 26, 2024, U.S. Immigration and Customs Enforcement (ICE) responded to a *Disability-Related Findings and Recommendations Memorandum* issued in September 2023 by the Office for Civil Rights and Civil Liberties (CRCL) that followed an targeted onsite investigation at the Boone County Jail (Boone). ICE concurred with all four recommendations.

Background

In April 2023, CRCL received an allegation from the Office of the Immigration Detention Ombudsman that individuals with disabilities at Boone were being denied requests for lower bunk assignments. As a result of these allegations, CRCL conducted a targeted onsite investigation at Boone in May 2023 to review the facility's provision of reasonable modifications to individuals with disabilities.

Findings and Recommendations

On September 29, 2023, CRCL issued ICE a *Disability-Related Findings and Recommendations Memorandum* based on its investigation. The memo includes four recommendations to enhance disability identification and modification. The following highlights the top three findings and actions that ICE agreed to take as a result of CRCL's recommendations.

Intake Screening

CRCL determined that the facility's intake screening process did not include questions to identify individuals who require mobility or auxiliary aids or services. The facility agreed to update its intake system with additional questions to screen for possible disabilities and any related reasonable modifications.

Sick Call Forms

CRCL found that the facility was primarily using hand-written sick call request forms for disability-related modification requests, creating potential issues for individuals with language barriers or accessibility issues. CRCL recommended that the facility develop and implement a distinct disability request modification process to allow noncitizens to request modifications. ICE agreed that medical staff would meet with any noncitizen who expressed a need for disability modification verbally, in writing, or through the assistance of another person to ensure equal access to facility programs and services.

Modification Request Guidance

CRCL found that several noncitizens with disabilities did not know how to make a modification request, due in part to language barriers. CRCL recommended that ICE ensure that information relating to disability modification requests be available in each noncitizen's native language, and that written materials be available in Spanish and other languages frequently encountered in the facility. ICE provided the facility with relevant materials in Spanish and several other languages, and the facility agreed to utilize interpretation services where needed.

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.

April 22, 2024