



Office for Civil Rights and Civil Liberties

Summary of CRCL Onsite Memorandum and ICE's Response *Buffalo Service Processing Center*

On June 21, 2024, U.S. Immigration and Customs Enforcement (ICE) responded to an Onsite Recommendation Memorandum issued in February 2024 by the Office for Civil Rights and Civil Liberties (CRCL) that followed an onsite investigation at the Buffalo Service Processing Center (BSPC). ICE concurred with 22 recommendations, partially concurred with five, and non-concurred with eight.

Background

Between May 2022 and February 2023, CRCL opened six representative complaints involving noncitizens in ICE custody at BSPC. These allegations included concerns related to dental care, medical care, mental health treatment, legal access, language access, volunteer work program, commissary, telephone services, and the grievance process. As a result of these complaints, CRCL conducted a multidisciplinary investigation at BSPC in June 2023 to examine the facilities operations and assess issues raising civil rights and civil liberties concerns.

Findings and Recommendations

On February 14, 2024, CRCL issued ICE an Onsite Recommendation Memorandum based on its investigation conducted with the assistance of contract subject matter experts. The memo included 35 recommendations in the general 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.

Medical Leadership and Staffing

CRCL found that all medical leadership positions and a significant number of staff positions in the medical, mental health, and dental units were vacant. ICE agreed to fill vacancies as soon as possible, noting that ICE Health Services Corps continues to aggressively recruit qualified individuals for the vacancies. ICE agreed that the facility would continue to deploy officers from other facilities to support BSPC until the positions were filled with permanent staff.

Mental Health Treatment Plans

CRCL found that treatment plans were generic and cursory, failed to provide adequate updates or a road map on how noncitizens could achieve goals, and rarely changed overtime. ICE agreed that treatment goals should be individualized, measurable, attainable, reasonable, and timely.

Suicide Prevention

CRCL found that the cells utilized in the medical housing unit and the Special Management Unit for suicide watch are not suicide resistant. ICE agreed to not use cells with any protrusions or anchor points for suicide watch.

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.