MEMORANDUM TO: Nathalie R. Asher  
Acting Executive Associate Director  
Enforcement and Removal Operations  
U.S. Immigration and Customs Enforcement

FROM: Veronica Venture  
Deputy Officer  
Office for Civil Rights and Civil Liberties

Dana Salvano-Dunn  
Director, Compliance Branch  
Office for Civil Rights and Civil Liberties

SUBJECT: LaSalle Detention Facility  
Supplemental Expert Recommendation Memorandum  
Complaint Nos. [b][6]

The U.S. Department of Homeland Security (DHS) Office for Civil Rights and Civil Liberties (CRCL) is conducting an investigation into conditions of detention for U.S. Immigration and Customs Enforcement (ICE) detainees at the LaSalle Detention Facility (LDF), located in Jena, Louisiana. CRCL’s review of LDF focused in large part on operations in the areas of suicide prevention; medical care; and conditions of confinement. On August 21, 2017, CRCL issued its Expert Recommendation Memorandum for this facility. ICE has not yet responded to this memorandum. This Supplemental Expert Recommendation memorandum focuses on our findings regarding four detainee deaths that occurred at LDF between January 23, 2016 and March 13, 2017. CRCL received and reviewed the relevant documents related to these deaths after our onsite investigation concluded on March 17, 2017. Thus, these findings and recommendations were not included in the initial Expert Recommendations Memorandum.

Enclosed with this memorandum is the separate report prepared by our subject-matter expert following the onsite review. With this memorandum, and consistent with our standard practice,

1 The detainees’ personally identifying information (PII) is set out in the attached PII memo, so that this memo can be freely shared (without that attachment) with those who do not have a need to know this PII.
2 CRCL onsite investigation occurred March 13-17, 2017.
3 In general, CRCL’s experts relied on the applicable 2011 Performance Based National Detention Standards (2011 PBNDS) and related professional standards in conducting their work and preparing their reports and
we request that you indicate whether ICE concurs with the expert recommendations, and that for those agreed to, you provide an action plan within 60 days.

Medical Care and Treatment

CRCL’s medical expert reviewed the in-custody deaths of four ICE detainees. CRCL’s medical expert concurred with the Office of Detention Oversight (ODO) reviewers’ findings and recommendations, but has additional recommendations he believes that ICE should consider.

1. In that two of the three cases reviewed by CRCL’s medical expert involved a failure of nursing staff to report abnormal vital signs to a provider (physician or nurse practitioner), IHSC should develop and deploy guidelines for a nurse’s response to abnormal vital signs, with clear thresholds for when to call a provider.

2. Given the significant delays associated with the medical care and treatment of the Detainee involved in Complaint 4(b) (6) directly related to the complexities of his illness, ICE should assess the sub-specialty support available in Jena, Louisiana, and, where sub-specialty support is determined to be limited or unavailable, transfer detainees in need of the specific sub-specialty services to another facility until appropriate sub-specialty support can be secured. (2011 PBNDS Medical Care, § II. 5, V.A.5).

3. In that LDF failed to provide the Detainee involved in Complaint 4(b) (6) with a wheel chair and/or a cane as medically required, IHSC should ensure that detainees requiring a medical aid are afforded the appropriate provision, except when such a provision would impact security. IHSC should issue a statement or guidance reminding LDF staff of this requirement and provide additional training where needed. (2011 PBNDS Medical Care, § 4.3.V. U).

The complete expert report and recommendations are contained in the enclosed expert report. It is CRCL’s statutory role to advise department leadership and personnel about civil rights and civil liberties issues, ensuring respect for civil rights and civil liberties in policy decisions and implementation of those decisions. We look forward to working with ICE to determine the best way to resolve these complaints. We request that ICE provide a response to CRCL 60 days whether it concur or non-concur with these recommendations. If you concur, please include an action plan. You can send your response by email. If you have any questions, please contact Senior Policy Advisor, by telephone at or by email at

4 Complaints Nos.

Deliberative Process Privilege
Copy to:

(b) (6), (b) (7)(C)

Corey A. Price
Acting Deputy Executive Associate Director
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
(b) (6), (b) (7)(C)

Tae Johnson
Assistant Director
Custody Management
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
(b) (6), (b) (7)(C)

Claire Trickler-McNulty
Acting Assistant Director
Office of Detention Policy and Planning
U.S. Immigration and Customs Enforcement
(b) (6), (b) (7)(C)

Dr. Stewart D. Smith
Associate Director
ICE Health Service Corps
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
(b) (6), (b) (7)(C)

Dr. Ada Rivera
Medical Director, ICE Health Service Corps
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement
(b) (6), (b) (7)(C)

Enclosures

Appendix A – PII Memorandum
Appendix B – Supplemental Medical Expert Report for LDF
Appendix C – Medical Expert Report for LDF

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