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February 8, 2021

Governor Jared Polis  
State Capitol Building  
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Denver, CO, 80203  
*Submitted via email to [governorpolis@state.co.us](mailto:governorpolis@state.co.us)*

Governor's Expert Emergency Epidemic Response Committee (GEEERC)  
*Submitted via email to [shannon.rossiter@state.co.us](mailto:shannon.rossiter@state.co.us)*

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*Submitted to <https://covid19.colorado.gov/CovidConcerns> & via email to [Jill.Ryan@state.co.us](mailto:Jill.Ryan@state.co.us)*

## **RE: COVID-19 Vaccination Distribution and Immigrant Detention**

Dear Governor Polis, GEEERC, and Executive Director Hunsaker Ryan:

We write as the Rocky Mountain Immigrant Advocacy Network (“RMIAN”) and the Colorado Medical Coalition for Human Rights. Thank you for your proactive steps to secure the state of Colorado in the face of the continued threat of COVID-19. As concerned community partners dedicated to serving immigrant communities, we write to urge you to address the critical challenge posed by immigrant detention facilities in Colorado.

Immigrants are a vital part of our communities and are essential to the identity of Colorado as a state. Hundreds of Coloradan residents are affected by the issue of civil immigration detention, with parents, spouses, children or loved ones separated from their families and held in confinement by Immigration and Customs Enforcement (“ICE”) or the Office of Refugee Resettlement (“ORR”). As immigration advocates and health professionals we remain firmly committed to the safe release of all individuals from these facilities and recognize the importance of ensuring the health and safety of those who are forced to remain detained.

We now know that detained immigrants are at high risk for COVID-19.<sup>1</sup> *Where* transmission occurs matters; the context of transmission “affects the basic reproduction number, leading to more

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<sup>1</sup> Am. Medical Ass’n, AMA Policy Calls for More COVID-19 Prevention for Congregate Settings (Nov. 17, 2020), <https://www.ama-assn.org/press-center/press-releases/ama-policy-calls-more-covid-19-prevention-congregate->

secondary infections in densely populated settings.”<sup>2</sup> Immigration detention centers “have space and population densities similar to those of cruise ships,” which have been found to have “astonishingly high” COVID-19 reproduction numbers.<sup>3</sup> Within detention facilities, personal protective equipment and administrative controls are “extremely challenging to implement.”<sup>4</sup>

Further, immigrants in detention facilities with ongoing COVID-19 outbreaks are denied access to the immigration court and due process protections. RMIAN has witnessed individuals under quarantine struggle to communicate with advocates, face delays in their requests for release under bond and for relief from deportation as hearings are rescheduled, and fail to gather evidence as movement within the facilities is restricted.

Apart from the health risks to and loss of due process rights for detained immigrants, outbreaks within congregate care settings are public health issues for the whole community as these settings become epicenters of transmission and disease.<sup>5</sup> As infectious disease specialist Carlos Franco-Paredes and state representative Yadira Caraveo write, these facilities are not “hermetically sealed.”<sup>6</sup> Even if correctional officers are vaccinated, individuals continue to be released and transferred among facilities, and service providers must continue to visit.

Colorado is home to the Aurora ICE Processing Center (“Aurora facility”), operated by for-profit corporate GEO Group, Inc, as well as an ORR facility for unaccompanied minor children in Westminster. Immigrants are also held at the Teller County Jail, located in Divide, Colorado. The Aurora facility has been the site of an ongoing COVID-19 outbreak.<sup>7</sup> Currently, around eight dormitories out of approximately 25 occupied dormitories at the Aurora facility are under quarantine. As of January 20, 2021, ICE reported 52 confirmed cases under isolation or monitoring and 181 cumulative cases.<sup>8</sup>

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settings; *see also* CO Health Inst., *The Pandemic Behind Bars: COVID-19, Vaccination, and the People in Colorado’s Prisons and Jails* (Jan. 28, 2021), <https://www.coloradohealthinstitute.org/research/pandemic-behind-bars>.

<sup>2</sup> William D. Lopez, et al., *Preventing the Spread of COVID-19 in Immigration Detention Centers Requires the Release of Detainees*, 111 *Am. J. Pub. Health* 110 (Nov. 19, 2020), <https://doi.org/10.2105/AJPH.2020.305968>.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> Carlos Franco-Paredes & Yadira Caraveo, *Guest commentary: Colorado should give incarcerated people higher priority for COVID vaccine*, *Denver Post*, Dec. 21, 2020, <https://www.denverpost.com/2020/12/21/opinion-prisoners-colorado-covid-vaccine/>.

<sup>6</sup> *Id.*

<sup>7</sup> *See, e.g.* Conor McCormick-Cavanagh, *COVID Cases: 64 GEO Group Employees in Aurora Test Positive*, *Westword*, Nov. 17, 2020, <https://www.westword.com/news/geo-group-staffers-in-aurora-experiencing-covid-outbreak-11845164>; Conor McCormick-Cavanagh, *There’s an Ongoing COVID Outbreak at the Aurora ICE Facility*, *Westword*, Oct. 26, 2020, <https://www.westword.com/news/ice-covid-outbreak-aurora-immigration-detention-facility-11832279>; Conor McCormick-Cavanagh, *Detainee Transfers Lead to COVID-19 Increase at Aurora ICE Facility*, *Westword*, Sept. 4, 2020, <https://www.westword.com/news/covid-uptick-at-aurora-ice-facility-coming-from-transfers-11789164>.

<sup>8</sup> *ICE Guidance on COVID-19*, U.S. Immigration & Customs Enf’t (Jan. 21, 2021), <https://www.ice.gov/coronavirus>.

While immigrant detention facilities are under the jurisdiction of the federal government, there are clear requirements<sup>9</sup> for the operation of these facilities, which include explicit requirements to coordinate with and abide by state and local public health mandates.

During a pandemic when the actions of a few can impact the wellbeing of so many, accountability for those who run detention facilities is paramount. The humanitarian crisis posed by the spread of COVID-19 in immigration detention facilities in Colorado has disastrous consequences for those detained in these facilities, as well as neighboring communities.

The American Medical Association recently adopted a policy<sup>10</sup> in support of improved health measures of prioritizing vaccine access to vulnerable individuals in immigrant detention. The policy notes, “Recognizing that detention center and correctional workers, incarcerated people, and detained immigrants are at high risk for COVID-19, the new policy also makes clear that these individuals should be prioritized in receiving access to safe, effective COVID-19 vaccines in the initial phases of distribution.”<sup>11</sup>

We also believe that individuals in detention harbor serious fears and mistrust towards detention operators, and as a result may not feel safe accepting vaccines from staff who work directly for or alongside their jailers. Given these serious challenges around trust towards detention operators we believe that public health officials and the community can play a vital role with respect to how vaccinations and information are presented and shared with individuals inside these facilities.

To that end we appeal to your respective offices to ensure the following with respect to the plans, processes, and procedures related to the COVID-19 vaccine.

- 1. Colorado must include immigrant detention facilities located in the state of Colorado in any plan related to securing our communities.**
- 2. The Governor’s Expert Emergency Epidemic Response Committee should meet with stakeholders on the issue of immigrant detention, including detained and impacted individuals, community organizations, health professionals, and experts on immigration detention.**
- 3. Colorado must do everything in its power to protect the health and safety of individuals in these facilities, including prioritizing their access to the COVID-19 vaccine, while providing them an informed choice with respect to any decisions related to vaccination.**

Sincerely,

ROCKY MOUNTAIN IMMIGRANT ADVOCACY NETWORK (RMIAN)  
COLORADO MEDICAL COALITION FOR HUMAN RIGHTS

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<sup>9</sup> U.S. Immigration & Customs Enf’t, Enf’t & Removal Operations, COVID-19 Pandemic Response Requirements (Oct. 27, 2020), <https://www.ice.gov/doclib/coronavirus/eroCOVID19responseReqsCleanFacilities.pdf>.

<sup>10</sup> Am. Medical Ass’n, AMA Policy Calls for More COVID-19 Prevention for Congregate Settings (Nov. 17, 2020), <https://www.ama-assn.org/press-center/press-releases/ama-policy-calls-more-covid-19-prevention-congregate-settings>.

<sup>11</sup> *Id.*

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