



U.S. Immigration
and Customs
Enforcement

March 12, 2018

MEMORANDUM FOR: Tae D. Johnson
Assistant Director, Custody Management

THROUGH: Jay M. Brooks
Deputy Assistant Director, Detention Management Division

FROM: Sean W. Gallagher
Field Office Director, Atlanta Field Office

SUBJECT: Waiver for Non-Violent High Custody Detainees to Work in Kitchen

Purpose

To provide a waiver to allow non-violent high-level detainees to work in the kitchen at the Stewart Detention Center (SDC). This waiver relates to Performance Based National Detention Standards, version 2011 (PBNDS 2011), *Section 2.2 Custody Classification System*, which states that "high custody detainees shall not be assigned work duties outside assigned living areas."

Background

Due to the high removal rate of medium-low to low detainees and the increase in operational, ICE Health Services Corps (IHSC) is unable to process sufficient physicals for food workers due to its priorities of conducting physical examinations and chest x-rays of potential kitchen workers over detainees that are pending 14-day physicals per PBNDS.

Discussion

On an average, high level detainees at the Stewart Detention Center have a longer average length of stay versus medium-low and low detainees. Granting an exception to this policy will facilitate continuity and will provide better service and higher quality of food services for all detainees.

Core Civic has agreed to provide a list of non-violent level 3 and high level 2 detainees who do not have any significant disciplinary issues to IHSC. IHSC will then screen the detainees for any medical problems which would preclude them from working in the kitchen area.

Core Civic will implement procedures to ensure that these detainees are closely monitored and do not have any contact with the medium-low to low level detainees. The non-violent level 3

and high level 2 detainees and will have direct supervision by Core Civic officers and Trinity food services employees.

Recommendation

I recommend that you approve a waiver for non-violent high-level detainees to work in the kitchen at the Stewart Detention Center (SDC) relating to PBNDS 2011 *Section 2.2 Custody Classification System*: High custody detainees shall not be assigned work duties outside assigned living areas.

Approve date

 4/5/18

Disapprove/date

Modify/date

Needs more discussion