

U.S. Department of Homeland Security
500 12th Street, SW
Washington, DC 20024



**U.S. Immigration
and Customs
Enforcement**

May 17, 2012

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

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

FROM: Cynthia R. Parker
Unit Chief, Detention Standards Compliance

SUBJECT: Hold Room Door Windows

Purpose: The Purpose of this memorandum is to request a waiver for the El Paso Processing Center (EPC) as it relates to section (V)(A)(10) of the ICE standard on Hold Rooms in Detention Facilities, which states that "hold room doors shall be equipped with security-glass or barred windows, 12" X 12", installed at eye level for convenient visual checks." The EPC was established in 1967. The EPC processing building, in which the hold rooms are located, was designed in 1996 and built in 1997, before the implementation of the INS/ICE Detention Standards (NDS) on September 20, 2000, and does not meet the measurements of the hold room door window. The hold rooms do have a window at eye level with measurements of 6"W X 28"L.

Background: On March 6-8, 2012, the Office of Detention Oversight (ODO) conducted an inspection of the EPC for areas of non-compliance with the ICE 2008 Performance Based National Detention Standards (PBNDS). The ODO inspection of the hold rooms revealed that they do not meet the hold room door window requirement of 12" X 12" and this was cited as a violation of the PBNDS. This reference, which is based on the "ICE/DRO Hold Room Design Guide" implemented as part of the 2000 NDS, applies to the design of facilities after September 20, 2000, and is not retroactive to previously existing facility structures.

Discussion: The EPC would like to request a waiver because the facility was designed and built prior to the implementation of the design guide standards, NDS and subsequent PBNDS.

Recommendation: I recommend that you approve a waiver to PBNDS (V) (A) (10).

Date Authorized _____
Date Modified _____

Jay M. Brooks, 6/4/12

Date Not Authorized _____
Needs more discussion _____

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