

U.S. Department of Homeland Security
2975 Decker Lake Drive, Suite 100
West Valley City, UT 84119



U.S. Immigration
and Customs
Enforcement

May 30, 2017

MEMORANDUM FOR: Tae Johnson
Assistant Director, Detention Management Division

FROM: Robert M. Culley
Field Office Director

SUBJECT: Washoe County Detention Facility Initial Dental Screening Waiver

Purpose

Approve a waiver for the Salt Lake City, Reno ERO Sub-Office (SLC/REN) as it relates to Medical Care. Part E, of the 2000 National Detention Standards (NDS) (Initial dental screening performed by a dentist, physician, physician's assistant or nurse practitioner). SLC/REN would respectfully request that the Washoe County Detention Facility (WCDF) be approved to allow trained registered nurses to complete initial dental screening exams in compliance with the 2014 National Commission on Correctional Health Care (NCCHC) standards for health services in jails.

Background

On July 21, 2016, Field Medical Coordinator, Matthew J. Gunter inspected WCDF medical department. Mr. Gunter found that trained nurses were performing initial dental screenings, and even though NCCHC accepts this practice, it is in conflict with ICE's NDS, which states, "If no on-site dentist is available, the initial dental screening may be performed by a physician, physician's assistant or nurse practitioner".

Discussion

The WCDF's medical care is contracted out to Naphcare Inc. and successfully became NCCHC certified in January, 2016. WCDF transports detainees to off-site dentist facilities to perform all in-depth dental exams and treatment. WCDF does not have the resources to transport every detainee off-site to obtain an initial dental screenings as well as the resources to add a full time dentist on the Naphcare contract, thus the transporting of each detainee within 14 days for an initial dental screening becomes logistically impracticable. WCDF nurses are trained by a dentist to conduct initial dental screenings and receive ongoing training annually in compliance with the

SUBJECT: Washoe County Jail Initial Dental Screening Waiver Request

Page 2

NCCHC standard J-E-06 (Oral Care), which allows a trained registered nurse to perform initial dental screening.

Recommendation

I recommend that you approve a waiver to Medical Care, Part E, Dental Treatment within the NDS, and allow trained registered nurses to conduct initial dental screening within 14 days of the detainee's arrival, which complies with NCCHC standards for dental treatment.

Approve/date

Jmb 5/31/17

Disapprove/date

Modify/date

Needs more discussion