



U.S. Immigration  
and Customs  
Enforcement

MAR 29 2018

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

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

FROM: Gregory J. Archambeault  
Field Office Director  
San Diego Field Office

SUBJECT: San Luis Regional Detention Center Initial Dental Screening  
Waiver Request

Purpose

To provide a waiver for the San Diego Intergovernmental Service Agreement (IGSA), San Luis Regional Detention Center (SLRDC), as it relates to Dental Treatment per the Performance-Based National Detention Standards (PBNDS) 2011, Part 4.3 Medical Care, Section R.

Background

On February 6, 2017, the Immigration Health Service Corps (IHSC) Field Medical Coordinator (FMC) for the San Diego ICE Field Office inspected SLRDC. The FMC found that trained nurses were performing initial dental screenings. The National Commission on Correctional Health Care (NCCHC) and PBNDS 2011 do not accept this practice. This conflicts with ICE's National Detention Standards (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

SLRDC's medical care for ICE detainees is contracted out to La Salle, and NCCHC governs their policies. SLRDC transports detainees to off-site dental facilities to perform all in-depth dental exams and treatments. SLRDC does not have the resources to add a full-time dentist on the La Salle Contract, thus transporting of each detainee within 14 days for an initial dental screening becomes logistically impractical. SLRDC nurses will be trained yearly by the Advanced Practice Practitioner/Clinical Director so they comply with the NDS standard, which allows a trained nurse to perform initial dental screenings.

San Luis Regional Detention Center Initial Dental Screening Waiver Request  
Page 2

Recommendation

I recommend authorization of a waiver for the San Diego IGSA for PBNDS Part 4.3 Medical Care, Section R.

Date Authorized 7mb 4/15/18 Date Not Authorized \_\_\_\_\_  
Date Modified \_\_\_\_\_ Needs More Discussion \_\_\_\_\_

*Aa previous IHSC concurrence.*