

all State of Iowa requirements. Sanitation procedures are highly prioritized in PCJ because the possible transfer of diseases among the detainees.

Recommendation

I recommend authorization of a waiver for the Polk County Jail, of the ICE NDS, Environmental Health and Safety standard, section (III)(P)(1)(2)(4).

Date Authorized Jay M Brooks 3/19/14 Date Not Authorized _____
Date Modified _____ Needs more discussion _____



U.S. Immigration
and Customs
Enforcement

MEMORANDUM FOR: Tae D. Johnson
Assistant Director, Custody Management Division
Jay M. Brooks, (A) AD
THROUGH: Jay M. Brooks
Deputy Assistant Director, Detention Management Division
FROM: Scott R. Banieceke *SRB*
St. Paul Field Office Director
SUBJECT: Polk County Jail, Des Moines, Iowa – Waiver Request

Purpose

Provide a waiver for the St. Paul Field Office/ Polk County Jail, Des Moines, Iowa (PCJ) as it relates to the Environmental Health and Safety Standard in Detention Facilities, Section (III)(P)(1)(2)(4), within the 2000 National Detention Standards (NDS), 2008 or 2011 Performance-Based National Detention Standards (PBNDS). This standard states: In accordance with the ICE NDS, Environmental Health and Safety, section (III)(P)(1)(2)(4), the FOD must ensure sanitation of barber operations is of the utmost concern because of the possible transfer of diseases through direct contact or by towels, combs, and clippers. Towels are not be reused after a single use. If there is successive use of instruments such as combs and clippers, they must undergo proper cleaning and disinfecting. All facilities will adhere to the following standards:

- The operation will be located in a separate room not used for any other purpose. The floor will be smooth, nonabsorbent, and easily cleaned. Walls and ceiling will be in good repair and painted a light color. Artificial lighting of at least 50-foot candles will be provided. Mechanical ventilation of five air changes per hour will be provided if there are no operable windows to provide fresh air. At least one lavatory will be provided. Both hot and cold water will be available, and the hot water will be capable of maintaining a constant flow of water between 105 degrees and 120 degrees.

Background: As of the May 7, 2013 ODO Compliance Inspection the PCJ is without a separate area to provide barber operations.

Discussion: Physical plant limitations preclude a separate dedicated barbershop area. The area utilized for barbering is used for nothing else during hair cutting operations. Conditions meet