

U.S. Department of Homeland Security
630 Sansome Street
San Francisco, CA 94111



U.S. Immigration
and Customs
Enforcement

February 8, 2018

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

THROUGH: Jay M. Brooks *JMB*
Deputy Assistant Director for Custody Management

FROM: Erik S. Bonnar
Acting Field Office Director **ERIK S BONNAR**

SUBJECT: Waiver for Preventive Lock Maintenance

Digitally signed by ERIK S BONNAR
DN: c=US, o=U.S. Government, ou=Department
of Homeland Security, ou=ICE, ou=People,
cn=ERIK S BONNAR,
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Date: 2018.02.08 10:17:30 -08'00'

Purpose

Provide a waiver for the Yuba County Jail (YUBAJCA) as it relates to the Key and Lock Control in Detention Facilities, section (III)(B)(5) and section (III)(B)(6) within the 2000 National Detention Standards (NDS), which states "the Security Officer shall implement a preventive maintenance program" and "the Security Officer will maintain all preventive-maintenance records."

Background

Yuba County Jail is a 428 bed Intergovernmental Service Agreement (IGSA) facility, located in Marysville, California. Yuba County Jail houses approximately 200 ICE detainees daily for Immigration and Customs Enforcement (ICE).

On November 7-9, 2017, the Nakamoto Group conducted a Compliance Inspection of the Yuba County Jail for areas of noncompliance with the ICE National Detention Standards. The Nakamoto review found that Yuba County Jail does not follow a preventive maintenance program nor do they keep preventive maintenance documentation as it relates key and lock control. This is considered a repeat deficiency according to section (III) (A) (2) of the 2000 National Detention Standards (NDS).

Discussion

Yuba County Jail facility Security Officer has 40 years of maintenance technician experience. He effectively repairs both mechanical locks and electronic security systems. Lock maintenance is performed on as as-needed basis and he maintains documentation of the work

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Waiver for Preventive Lock Maintenance

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performed. Yuba Deputies who routinely use the facility locks, know to alert the Security Officer immediately if there are any signs of excessive wear or potential failure. In any case, preventive maintenance is no guarantee against malfunction. A waiver is requested for the preventive maintenance component as described in the NDS. Current maintenance practices have been deemed sufficient by the Security Officer/Maintenance Technician who has been servicing the locks at Yuba County for close to 40 years. Additional and unnecessary lock maintenance would result in a financial hardship to the facility while providing limited or no benefit.

Recommendation

I recommend that you approve a waiver to NDS Key and Lock Control, Section (III)(B)(5) and (III)(B)(6) and defer to the current lock maintenance practice of the Yuba Security Officer . If circumstances change, this waiver can be amended or rescinded at any time.

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Approve/date Jmb 11/5/18 Disapprove/date _____

Modify/date _____ Needs more discussion _____