OPERATIONS MEMORANDUM

ICE HEALTH SERVICE CORPS

Orientation for New IHSC Field Employees

OM: 21-002

Effective Date: December 1, 2021

By Order of the Assistant Director Stewart D. Smith, DHSc, FACHE

STEWART D SMITH Digitally signed by STEWART D SMITH Date: 2021.12.06 11:12:42 -05'00'

TO: IHSC Public Health Service (PHS) Commissioned Corps Officers, Civilian Federal Employees, and Contract Personnel

SUBJECT: Orientation of New IHSC Health Staff

- PURPOSE: The purpose of this operations memorandum (OM) is to outline current policy and procedures that ensure health staff are properly trained and acclimated to work in the detention environment and understand their roles and responsibilities.
- 2. APPLICABILITY: This operations memorandum (OM) applies to all U.S. Immigration and Customs Enforcement (ICE) Health Service Corps (IHSC) personnel, including but not limited to U.S. Public Health Service (PHS) Commissioned Corps officers, federal employees, and contract support staff. It applies to IHSC personnel supporting health care operations in both IHSC-staffed and non-IHSC-staffed detention facilities.
- 3. AUTHORITIES AND REFERENCES: None.
- 4. **POLICY:** The HSA oversees and directs the new employee orientation program within their respective facility. Supervisory staff at IHSC-staffed facilities, which include clinical director (CD), nurse manager (NM), contract coordinator (CC), and departmental leads, must provide new IHSC field employees with basic and indepth orientation within 90 days of employment.
 - **4-1.** The HSA approves the orientation program as the responsible health authority, in collaboration with the CD and NM, as a function of the leadership triad. The facility administrator reviews the orientation plan and verification sheet annually for awareness and knowledge of IHSC's orientation program. The facility administrator signs and dates the verification sheet confirming review.

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- 4-1.1 The HSA, in collaboration with the CD and NM, review the orientation program lesson plan(s) for effectiveness annually or more frequently, as needed and make appropriate changes.
- 4-1.2 All health staff receive a basic orientation training on the first day of on-site service. The following list identifies the required training materials needed to complete basic orientation for all new health staff:
 - 4-1.2.a IHSC Facility Orientation Guide for new employees
 - 4-1.2.b IHSC Facility Orientation Checklist
 - 4-1.2.c Facility Orientation Checklist Guide for supervisors
 - 4-1.2.d PALMS course listing for initial orientation training
- 4-1.3 Within 90 days of employment, all health staff must complete an indepth orientation training. The following elements complete the indepth orientation training when combined with the basic orientation training elements identified:
 - 4-1.3.a IHSC 101 orientation, which cover the material contained in the IHSC Orientation Guide
 - 4-1.3.b IHSC discipline specific orientation
 - 4-1.3.c 40-hour Custody Environment training as listed below
- 4-1.4 The administrative assistant maintains a documented orientation completion file for all health staff.

5. PROCEDURES:

- **5-1.** All health staff participate in basic orientation on the first day of on-site service. The HSA, supervisor, or designee provides the resources (see appendices) and guidance necessary to complete the orientation:
 - 5-1.1.a IHSC Orientation Guide
 - 5-1.1.b IHSC Year in Review Report
 - 5-1.1.c IHSC Facility Orientation Guide
 - 5-1.1.d Facility Orientation Checklist (Appendix A)
 - 5-1.1 PALMS Orientation Course Listing: The administrative assistant assists new staff with procuring identification badges, parking access, and information technology access. New staff acknowledge in writing they have reviewed facility work rules, ethics, regulations, conditions of employment, and related

documents.

5-1.1.a PALMS Orientation Course Listing

- 5-1.2 The administrative assistant places a copy of the signed acknowledgement in the new employee's personnel file.
- **5-2.** Custody Environment: Medical staff participate in an orientation conducted by the facility custody personnel, in addition to IHSC's orientation to the health services delivery system.
 - 5-2.1 Staff receive orientation and/or training appropriate for their position.
 - 5-2.2 All new full-time health care employees must complete a formalized, 40-hour orientation program before starting their assignments. At a minimum, the orientation provides an overview of the following topics:
 - 5-2.2.a Purpose, goals, policies, and procedures for the facility and parent agency.
 - 5-2.2.b Organization of health services at the facility security; including classification and the detainee social system.
 - 5-2.2.c Contraband regulations
 - 5-2.2.d Key control
 - 5-2.2.e Appropriate conduct with detainees
 - 5-2.2.f Employee responsibilities and rights
 - 5-2.2.g Universal precautions
 - 5-2.2.h Suicide risk, precaution, prevention, and intervention
 - 5-2.2.i Drug free workplace
 - 5-2.2.j Occupational exposure
 - 5-2.2.k Personal protective equipment
 - 5-2.2.l Biohazardous waste disposal
 - 5-2.2.m Detention environment overview
 - 5-2.2.n Fire and safety
 - 5-2.2.o Emergency plans and procedures
 - 5-2.2.p Code of ethics
 - 5-2.2.q Personnel policy manual

- 5-2.2.r Facility tour
- 5-2.2.s Facility goals and objectives
- 5-2.2.t Facility organization
- 5-2.2.u Staff rules and regulations
- 5-2.2.v Personnel policies
- 5-2.2.w Program overview
- 5-2.2.x ICE/ERO detention standards
- 5-2.2.y Cultural and language issues, including requirements related to limited English proficient detainees
- 5-2.2.z Detainees with disabilities and special needs
- 5-2.2.aa Use of force
- 5-2.2.bb Sexual abuse and misconduct awareness and reporting
- 5-2.2.cc Staff conduct in hostage situations
- 5-2.2.dd Health emergencies
- 5-2.2.ee Hunger strikes
- **5-3.** When possible, the orientation program must include both health and custody staff to demonstrate teamwork and collaboration.
 - 5-3.1 Supervisors assign a preceptor to each new employee for the initial 90-day training period. The supervisor provides each new employee an orientation checklist to ensure new employees complete all required orientation topics. The preceptor, supervisor, employee, and HSA sign the orientation checklist prior to placement in the new employee's personnel file.
 - 5-3.2 When applicable, discipline specific leadership provide the employee with a discipline specific orientation guide.
- 6. HISTORICAL NOTES: None.

7. DEFINITIONS:

7-1. Basic orientation - information necessary for the health staff member (e.g., full-time, part-time, consultant, pool) to function safely in the facility. At a minimum, this addresses security and health services policies and procedures, response to facility emergency situations, the staff member's functional position description, and detainee—staff relationships. Staff must complete basic orientation prior to providing on-site services.

7-2. In-depth orientation - includes a full familiarization with the health services delivery system and focuses on the similarities and differences between providing health care in the community and in a correctional setting. At a minimum, this includes all health services policies and procedures not addressed in the basic orientation. It includes an overview of the health and age-specific needs of the detainee population, infection control using standard precautions, confidentiality of records, and health information. The content may vary depending on the roles and responsibilities of the new staff member.

8. APPLICABLE STANDARDS:

- 8-1. Performance-Based National Detention Standards (PBNDS), 2011, Rev. 2016.
 - 8-1.1 Part 7: Administration and Management; 7.3. Staff Training.
- 8-2. Family Residential Standards 2020.
 - 8-2.1 Part 7: Administration & Management; 7.3 Staff Training.
- 8-3. Performance-Based National Detention Standards, 2008.
 - 8-3.1 Part 7: Chapter 40, Staff Training.
- 8-4. American Correctional Association (ACA).
 - 8-4.1 4-ALDF-7B-05. Training and Staff Development.
 - 8-4.2 4-ALDF-7B-09 Training and Staff Development.
- **8-5.** National Commission on Correctional Health Care (NCCHC): Standards for Health Services in Jails, 2018
 - 8-5.1 J-C-09. Orientation For Health Staff.
- 9. RECORDKEEPING: ICE uses detainee health records and information maintained in accordance with the DHS/ICE-013 Alien Health Records System of Records to provide for the care and safety of detainees. IHSC limits access to detainee health records and information to those individuals who need to know the information for the performance of their official duties, and who have appropriate clearances or permissions. IHSC secures paper records in a locked cabinet or room when not under the direct control of an officer or employee with a need for the paper record to perform their duties.
 - **9-1.** IHSC staff complete annual training on the protection of patient health information and sensitive personally identifiable information.
 - **9-2.** IHSC staff reference the Department of Homeland Security Handbook for Safeguarding Sensitive PII (Handbook) at DHS Handbook for Safeguarding

- Sensitive PII for additional information concerning safeguarding sensitive PII.
- 9-3. All relevant documents produced or provided in accordance with this Directive must be maintained in accordance with an applicable National Archives and Records Administration (NARA) General Records Schedule (GRS) or a NARA-approved agency-specific records control schedule. If the records are not subject to a records schedule, the agency must maintain them indefinitely. In the event the records are subject to a litigation hold, the agency may not dispose documents under a records schedule until further notification. IHSC must obtain ICE Records Officer approval prior to the disposition of any records referenced in this directive.
- 10. NO PRIVATE RIGHT STATEMENT: This operations memorandum is an internal memorandum of IHSC. It is not intended to, and does not create any rights, privileges or benefits, substantive or procedural, enforceable against the United States; its departments, agencies, or other entities; its officers or employees; or any other person.
- **11. POINT OF CONTACT:** Chief, Health Operations Unit.

APPENDIX A:

FACILITY ORIENTATION CHECKLIST

FACILITY:
EMPLOYEE NAME:
DATE REPORTED TO FACILITY:
POSITION:

TOPICS	BY	Completion Date	Initials (Supervisors/ Preceptors)
NCYOVERVIEW			
IHSC 101 (Mission/Vision/Values)	SUPERVISOR/PALMS/IPU		
IHSC Orientation Guide	SUPERVISOR/IPU		
ICE AFOD, DFOD, OIC/ Security Leadership (all roles)	HSA/AHSA		
Other ICE /Custody Staff/stakeholders in the building	HSA/AHSA		
CHAIN OF COMMAND			
Department of Homeland Security	HSA/AHSA		
Immigration & Customs Enforcement	HSA/AHSA		
Organizational charts (ICE/ERO, IHSC, local facility)	HSA/AHSA/SUPERVISOR		
*FACILITY INFORMATION (Site Specific)			
Facility tour (introductions to facility leadership and stakeholders)	HSA/AHSA/CC/ SUPERVISOR		
Access to facility & parking	HSA/AHSA/CC/AA		
Computer Access Request (complete form)	HSA/AHSA/CC/AA		
Detainee/resident rules and regulations	HSA/AHSA/CC		
Hours of operation	HSA/AHSA/CC		
Badge / ID(s): facility, PIV	HSA/AHSA/CC/AA		
Contraband	HSA/AHSA/CC		
Security (procedures and regulations)	HSA/AHSA/CC		
Supervision of residents/detainees	HSA/AHSA/CC		
*Personnel (**provide copies for on-site file)			
Awards (as applicable)	SUPERVISOR/CC		
Professional education (CME/CEU) **	SUPERVISOR/CC		
Credentialing verification (certification, licensure, degree) **	HQ Credentialing/ SUPERVISOR/CC/AA		
Emergency Contact Information/ Emergency Recall Roster	HSA/AHSA/CC/AA		
Employee Assistance Program (EAP)	SUPERVISOR/CC		
Occupational health record (vaccines, declination statement) **	FHPM/CC/AA		
Employees' rights and responsibilities	SUPERVISOR/CC		
Dress code/ wear of uniform (national policy)	SUPERVISOR/CC		
Employee Grievance process	SUPERVISOR/CC		

Outside activity form (federal employees only) (DHS G-843)	SUPERVISOR	
Government travel card PHS & GS (complete form)	SUPERVISOR	
Official travel (Concur)	SUPERVISOR	
Leave policy (absence reporting time & attendance	SUPERVISOR/CC	
Performance review (COER, PWP, contractor)	SUPERVISOR/CC	

APPENDIX B

PALMS ORIENTATION TRAINING

FACILITY:	
DATE REPORTED TO FACILITY: _	
NAME:	
POSITION:	

	TOPICS	DATE COMPLETED	INTIALS (Supervisor/ Preceptor)
1	IHSC 101 (Mission/Vision/Values)		***************************************
2	A.E.D. Refresher		
3	Age Specific Competency		
4	CLIA		
5	Cultural Diversity and Health Care		
6	Dental Training for Medical Staff		
7	Effective Crises Communication		
8	E-mail Etiquette		
9	Emergency Response Training		
10	HFMEA		
11	Hostage Situation		
12	Hunger Strikes		
13	Key and Lock Control		
14	Medication Administration		
15	Medical Equipment		
16	Medical Records Documentation		
17	Medical Records and Media Requests		
18	Mental Health/Substance Abuse		
19	Pain Assessment		
20	Prison Rape Elimination Act (PREA)		
21	Quality Improvement		
22	Residential Program Overview		
23	Risk management		
24	Suicide Prevention and Intervention		
25	Terminal Illness & advance directives		
26	Tool and Control		
27	Writing a Root Cause Analysis (report writing)		
28	Back Safety and Injury Prevention		
29	Bloodborne Pathogen Awareness		
30	Diversity on the Job: Importance of Diversity and the Changing Workplace		
31	DHS Basic Records Management		
32	DHS Department Wide File Plan		

33	DHS No FEAR Act Training	
34	DHS Preparedness: IS 907 - Active Shooter: What You Can Do	
35	DHS Together Employee and Organizational Resilience Training – For Civilians	
36	Electronic Records Management	
37	Fire Safety and Prevention	
38	Hazard Communication: An Employee's Right to Know (MSDS)	
39	Human Trafficking Awareness	
40	Information Assurance Awareness Training (IAAT)	
41	ICE Ethics Orientation	
42	Module 1: (eHR) Electronic Health Records Overview	
43	Module 2: (eHR) Documentation and Encounters	