

OFFICE OF FIELD OPERATIONS

IMPLEMENTATION PLAN

ENHANCED MEDICAL SUPPORT EFFORTS

CONCEPT OF OPERATIONS

A. OFO OPERATIONAL PERSPECTIVE

1. OFO is a law enforcement organization responsible for homeland security, which includes the deterrence, detection, apprehension, processing and short-term holding of persons interdicted between the ports of entry of the United States.
2. OFO is committed to enhancing medical support along the SWB for the appropriate care and custody of those in OFO facilities.
3. OFO's goal is to expedite transfer of persons in custody to ICE or HHS as appropriate, or to otherwise transfer or release persons from OFO custody, as expeditiously as possible. See 8 U.S.C. § 1232(b) (3).
 - i. This goal informs CBP's approach to medical support.
 - ii. From a medical perspective, the optimal approach is to expedite transfer of persons from CBP custody (with limited medical support capabilities) to HHS or ICE custody (with robust, detention-level medical support capabilities) or into a broader community with additional medical support capabilities.
4. OFO facilities are not designed with medical capabilities to conduct longer-term detention. OFO's partner organizations, including U.S. Immigration and Customs Enforcement (ICE) and the Department of Health and Human Services (HHS) are intended to conduct longer-term detention, with more robust, detention-level medical support capabilities.

B. POLICY, AUTHORITIES, AND STANDARDS

1. OFO shall adhere to relevant and current or superseding policies, authorities, and standards regarding medical support for persons in custody including:
 - i. TEDS Standards;
 - ii. CBP Enhanced Medical Support Directive;
 - iii. Other relevant Department of Homeland Security (DHS)/CBP medical directives and policies; and
 - iv. Applicable legal authorities, including statutory requirements (e.g. Homeland Security Act, Immigration and Nationality Act, and Trafficking Victims Protection Reauthorization Act), and all applicable court orders and consent decrees.

C. COMMAND AND CONTROL

1. The Executive Assistant Commissioner shall have responsibility for overall direction, management, and oversight of OFO medical support efforts in accordance with any policy guidance from the CBP Office of the Commissioner.
2. The Office of Field Operations (OFO), Operations Directorate, Field Readiness Division (FRD) shall have responsibility for coordination of OFO medical support efforts
3. OFO Directors of Field Operations (DFO's) shall have responsibility for direction of OFO medical support efforts within their respective areas of responsibility.
4. CBP Chief Medical Officer (CMO) shall provide medical direction and oversight for OFO medical support efforts.
5. The CBP CMO shall be responsible for coordinating with the DHS CMO to ensure alignment with departmental requirements and policies, in accordance with the DHS CMO's role to provide operational medical support under Public Law 115-387 of December 21, 2018, the "Countering Weapons of Mass Destruction Act of 2018", which amends the Homeland Security Act of 2002 ((6 U.S.C. 591 et seq.), as delineated in Section 1931."

D. MEDICAL SUPPORT GOALS

1. OFO enhanced medical support shall:
 - i. Align with the OFO operational law enforcement mission;
 - ii. Function as a front-line element of a broader network of medical care – including local health systems, ICE, and HHS;
 - iii. Limit harm by providing appropriate access to medical care for persons in custody
 - iv. Promote CBP workforce health.

E. MEDICAL SUPPORT APPROACH

1. OFO recognizes its critical role in medical support, consistent with its law enforcement mission, as a front-line element of a broader network of medical support.
2. OFO shall rely heavily on referral to local health systems (and local standards of care). Additionally, USBP will rely on transfer to partners at ICE and HHS that have been designed and funded with more robust medical capabilities.
 - i. OFO shall utilize a layered approach to medical support, with no single point of failure.

- ii. Officers recognize and respond to signs/symptoms of injury, illness, or infection.
- iii. OFO shall promptly activate the 911 system or refer persons in custody to the local health system whenever appropriate for evaluation and treatment.
- iv. OFO shall ensure the conduct of health intake interviews and medical assessments as directed by the Enhanced Medical Directive (CBP Directive 2210-004). (SOP II)
- v. OFO shall have contracted medical support personnel at medical priority facilities along the SWB. (SOP I)
- vi. Contracted medical support capabilities shall include:
 - initial medical assessment;
 - diagnosis;
 - treatment of basic medical conditions;
 - medical referral for complex or urgent conditions;
 - follow-up care while in CBP custody;
 - public health/infectious disease management (PH/ID); and
 - Medical summaries prior to travel, transfer, or release, as appropriate.
- vii. OFO shall have a low threshold for timely referral of persons in custody with complex or urgent medical issues to the local health system.
- viii. OFO shall coordinate and collaborate with a broad network of medical support stakeholders.
- ix. The CBP CMO shall provide medical direction and oversight of OFO medical support efforts on an ongoing basis.
- x. OFO, in coordination with the CBP CMO, shall support a robust and responsive CBP Medical Quality Management (MQM) program for the enhanced medical support efforts in this plan. (SOP VII)
- xi. OFO shall coordinate with and request assistance from other relevant stakeholders, such as DHS, ICE, HHS, the Centers for Disease Control and Prevention (CDC), and state/local health officials, as appropriate, for additional medical support.
- xii. In particular, OFO shall coordinate closely with ICE and HHS regarding transfer of persons in custody with medical issues identified, to include infectious diseases, mental health issues, and acute or chronic medical conditions.

F. ANNEXES: ENHANCED MEDICAL SUPPORT STANDARD OPERATING PROCEDURES (SOPs)

SOP I: Enhanced Medical Support: OFO shall determine medical priority locations and establish contracted medical support

SOP II: Enhanced Medical Support Process: OFO shall design and execute enhanced medical support processes

SOP III: Medical Support for Juveniles: OFO shall emphasize appropriate medical support for juveniles in custody.

SOP IV: Identification and Notification of Medical Issues: OFO shall develop and implement procedures for identification and notification of medical issues.

SOP V: Enhanced Medical Monitoring: OFO shall develop and implement procedures for enhanced medical monitoring.

SOP VI: Medication Review: OFO shall develop and implement procedures for medication review.

SOP VII: Medical Quality Management (MQM): OFO shall support CBP MQM program efforts.

SOP VIII: Public Health (PH)/Infectious Disease (ID) Management: OFO shall ensure appropriate consideration of PH/ID issues in its medical support efforts.

SOP IX: OFO shall ensure appropriate medical documentation, data management, reporting, communication, coordination, and continuity of care.

SOP X: Surge and Crisis Level Medical Support: OFO shall develop and implement processes for surge and crisis level medical support

SOP XI: Medical Monitoring, Compliance, and Review: OFO shall ensure appropriate monitoring, compliance, and review of OFO medical support efforts.