

2.14 Tool Control

I. Purpose and Scope

This detention standard protects detainees, staff, contractors and volunteers from harm and contributes to orderly facility operations by maintaining control of tools, culinary utensils and medical and dental instruments, equipment and supplies.

This detention standard applies to the following types of facilities housing ERO detainees:

- Service Processing Centers (SPCs);
- Contract Detention Facilities (CDFs); and
- State or local government facilities used by ERO through Intergovernmental Service Agreements (IGSAs) to hold detainees for more than 72 hours.

Procedures in italics are specifically required for SPCs, CDFs, and Dedicated IGSA facilities. Non-dedicated IGSA facilities must conform to these procedures or adopt, adapt or establish alternatives, provided they meet or exceed the intent represented by these procedures.

For all types of facilities, procedures that appear in italics with a marked (***) on the page indicate optimum levels of compliance for this standard.

Various terms used in this standard may be defined in standard “7.5 Definitions.”

II. Expected Outcome

The expected outcomes of this detention standard are as follows (specific requirements are defined in “V. Expected Practices”).

1. Tools, maintenance implements, culinary utensils, medical and dental instruments, equipment and supplies (particularly syringes,

needles and other sharps) shall be maintained on an inventory, and continually controlled and accounted for to ensure the safe and orderly operation of the facility.

III. Standards Affected

This detention standard replaces “Tool Control” dated 12/2/2008.

IV. References

American Correctional Association, *Performance-based Standards for Adult Local Detention Facilities*, 4th Edition: 4-ALDF-2D-02, 2D-03.

V. Expected Practices

A. Control, Care and Accountability for Tools

1. Prevents their use in escape attempts, as weapons, and in other ways that can be hazardous to individual safety or the good order of the facility.
2. Improves the appearance of shop and construction areas.
3. Helps ensure that tools are in good repair when needed.
4. Reduces costs of tool maintenance and inventory.
5. Holds detainees accountable for tools that have been assigned to them.

B. Written Policy and Procedures Required

Each facility administrator shall develop and implement a written tool control system that establishes the following:

1. a staff position responsible for:
 - a. developing and implementing tool control

procedures, and

- b. establishing an inspection system to ensure accountability;

The facility administrator shall delegate these responsibilities to the Chief of Security and shall also assign, in writing, the duties of tool control officer to a staff member of the Facility Maintenance Department;

2. a tool classification system;
3. procedures for marking tools so they are readily identifiable;
4. procedures for storing tools;
5. procedures and schedules for regular inventories of tools;
6. procedures for issuing tools to staff and detainee workers;
7. procedures governing lost tools;
8. procedures for surveying and destroying excess, broken, or worn-out tools; and
9. procedures for inspecting and controlling tools and equipment brought into the facility temporarily (e.g., repair and maintenance workers, sports teams.)

C. Tool Classification

The facility shall develop and implement a tool classification system.

Tools are assigned one of two categories:

1. *restricted (class “R”)—dangerous/hazardous tools; and*
2. *non-restricted—non-hazardous tools.*

Class “R” tools include:

1. *tools too dangerous for detainees to handle without constant staff supervision;*
2. *tools to which detainee access is prohibited;*

3. *tools that could facilitate an escape or an escape attempt;*
4. *tools that are useful in making weapons, could double as weapons, or are capable of causing serious bodily harm;*
5. *power hand tools, with or without cords; and*
6. *other tools which are generally hazardous to facility security or personal safety.*

Examples of restricted tools include:

1. *metal cutting blades;*
2. *mixing chambers;*
3. *bolt cutters;*
4. *ramset gun and ammunition (stored in armory only);*
5. *diamond-tipped tools;*
6. *core drills;*
7. *drills;*
8. *circular saws; and*
9. *knives and other sharp culinary utensils.*

The facility administrator shall establish a policy document on facility tool use and storage that includes separate, comprehensive, alphabetical lists of both restricted and non-restricted tools.

1. *The lists shall indicate which of the listed tools are available on-site, describe them by type, and specify tool sizes.*
2. *The lists shall be kept current by formatting them as attachments to the policy document, and shall be maintained and updated electronically.*
3. *The lists shall be updated and distributed at least quarterly.*

Tools included in tool sets and tools sized sequentially in standard increments may appear as a single listing. For example:

- *drill bits, metal/wood 1/32”-7/8”*
- *drill bits, metal/wood 7/16”-7/8”*
- *wrench, comb. box/open end 1/4”-7/16”*
- *wrench, comb. box/open end 7/16”-7/8”*

When a single set listing is insufficiently clear, each tool must be listed separately—for example, if a facility had a single “wrench, combination box/open end, 1 7/8 inches” but not the smaller or larger sizes; or had several wrenches in different sizes, but without standard size differences.

D. Daily Removal and Storage of Class “R” Tools

Staff shall remove restricted tools from work areas at the end of each workday for safekeeping in a secure tool room, the armory, or the control center.

E. Acetylene

Staff shall:

- 1. restrict the supply of acetylene entering the facility to the amount needed in a single day; and*
- 2. at the end of each workday, store the used and unused acetylene tanks outside the secured perimeter in accordance with applicable codes, standards and regulations (Occupational Safety and Health Administration’s industrial safety regulations, etc.).*

F. Departmental Responsibilities

At a minimum, the following departments shall maintain tool inventories:

1. Facility Maintenance Department;
2. Medical Department;
3. Food Service Department;
4. Electronics Shop;

5. Recreation Department; and
6. Armory

Each department head is responsible for implementing tool control procedures in that department, and the following procedures are specifically required of the facility maintenance department head, health services administrator (HSA), food service manager, electronics technician, recreation specialist and senior firearms instructor:

- 1. prepare a computer-generated inventory of all class “R” tools in the maintenance restricted-tool room, the medical facility, the food service department, the electronics work area, recreation areas and the armory;*
- 2. post a copy of the class “R” tool inventory with the equipment in a prominent position in the equipment area;*
- 3. submit a second copy of the inventory to the Chief of Security;*
- 4. retain a third copy in the department;*
- 5. review and where necessary revise the class “R” tool inventory on a regular schedule:*
 - a. weekly—food service,*
 - b. monthly—facility maintenance, medical, and*
 - c. quarterly—electronics work area, recreation areas, armory;*
- 6. forward a copy of the inventory report to the facility administrator;*
- 7. report missing tools in accordance with procedures specified below; and*
- 8. include on all inventory sheets the date of issuance/revision.*

G. Tool Identification

The facility administrator shall establish written

procedures for marking tools and making them readily identifiable.

1. *The tool control officer shall mark every tool in every work location with a symbol signifying its storage location (e.g., “armory,” “control center”). Some tools shall require AMIS bar-coding.*
2. *Tools too small, fragile, or otherwise susceptible to damage (e.g., surgical instruments, micrometers, small drill bits) shall be inventoried and kept in locked storage when not in use.*

H. Storage in Work Areas

The facility administrator shall establish written procedures for a tool-storage system that ensures accountability. Commonly used, mounted tools shall be stored so that a tool’s disappearance shall not escape attention.

1. *Work-detail supervisors shall account for all tools at the end of every work period.*
2. *Shadow boards shall provide storage for tools that can be mounted, as follows:*
 - a. *one tool per shadow;*
 - b. *tool and shadow identical in size and shape; and*
 - c. *color-coded:*
 - 1) *white backgrounds for all shadow boards*
 - 2) *red shadows for restricted tools*
 - 3) *black shadows for non-restricted tools*
3. *When a tool is removed from the inventory, its shadow shall likewise be removed from the shadow board;*
4. *Shadow boards accessible to detainees shall have expanded-metal covers and shall be locked when not in use;*

5. *All restricted tools shall be secured in a central tool room, isolated from the housing units;*
6. *If maintenance workers are assigned personal shadow boards, the boards must have expanded-metal covers;*
7. *Infrequently used tools may be stored in individual tool cages with shadow boards, secured by hasp and padlock:*
 - a. *they must be included in the regular inventory checks;*
 - b. *a tag shall indicate the tool has been removed from its cage and a sign-in/out board shall indicate area, date, times and user;*
 - c. *the staff member responsible shall maintain an inventory sheet in the tool cage and provide a copy to the tool control officer;*
 - d. *Tools not adaptable to shadow boards shall be kept in a locked drawer or cabinet;*
 - e. *Staff shall not open sterile packs for inventory or any other non-medical reason, except when tampering or theft is suspected, in which case staff shall contact the health services department before opening a pack from which instruments may have been removed. To prevent such incidents, sterile packs shall be stored under lock and key at all times; and*
 - f. *Individual toolboxes containing tools used on a daily basis must be secured with hasp and padlock. The individual responsible for the toolbox shall keep an inventory sheet in the toolbox, and the tool control officer shall maintain copies of all such inventory sheets.*

I. Receipt of Tools

1. *If the warehouse is located outside the secure perimeter, the warehouse shall receive all tool deliveries.*

If the warehouse is located within the secure perimeter, the facility administrator shall develop site-specific procedures (e.g., storing the tools at the rear sally port until picked up and receipted by the tool control officer). The tool control officer shall immediately place certain tools (e.g., band saw blades, files and all restricted tools) in secure storage.

2. *New tools shall be issued only after the tool control officer has marked and inventoried them. Inventories that include any portable power tools shall provide brand name, model, size, description and inventory control/AMIS number.*

J. Tool Inventories

The facility administrator shall schedule and establish procedures for the quarterly inventorying of all tools. Facilities shall use inventory control number/AMIS bar code labels as necessary.

1. *Inventory maintenance at each work location is the responsibility of the detail supervisor and department head.*
2. *The work detail supervisor or staff member assigned a toolbox shall be accountable for the control of his/her assigned tools on a daily basis.*
3. *Any tool permanently removed from service shall be turned in to the tool control officer for record keeping and safe disposal.*
4. *Tool inventories shall be numbered and posted conspicuously on all corresponding shadow boards, toolboxes and tool kits. While all posted inventories must be accurate, only the master tool inventory sheet in the office of the Chief of Security requires the certifiers' signatures.*
5. *Tools in current use shall be inventoried in accordance with the following schedule:*

- a. *Annual*

Once each year at a minimum, the tool

control officer and employees responsible for tools shall together inventory all tools/equipment on-site.

- 1) *Each inventory-taker shall certify with name, title and identification number the accuracy of that inventory. Certification must be approved by the facility maintenance supervisor and Chief of Security.*
- 2) *The tool control officer shall provide the Chief of Security a complete set of the separate inventories (e.g., restricted tools, non-restricted tools) referred to as the Master Tool Inventory Sheet.*

- b. *Quarterly*

To ensure the accuracy and completeness of current inventory listings and check the condition of shadows and markings, every three months the employees responsible for tools shall conduct verification inventories and initial the appropriate column on the master tool inventory sheet in the Office of the Chief of Security.

The Chief of Security shall assign an officer to monitor the quarterly inventories. This officer shall clearly initial the bottom of each form certifying that the records have been checked and all inventories completed.

6. *Inventory Files*

The facility administrator's designee shall maintain a separate file folder for each shop or area in which tools are stored.

- a. *The left side of the folder shall contain the master tool inventory sheet(s).*

When an addition or deletion is made to the master inventory, the page on which the change is made shall be completely retyped or reprinted and inserted into the master

inventory. Staff shall not destroy any of the original pages, but shall move them to the right side of the folder for future reference.

b. The right side of the folder shall also contain documentation including, but not limited to:

- 1) lost or missing tool reports;
- 2) requests for inventory additions or deletions;
- 3) survey requests and reports;
- 4) store room requisition forms; and
- 5) any other document directly related to site-specific tool control procedures.

c. When the annual inventory is completed, staff shall place the form on the left side of the folder and move the previous year's to the right side. Each folder shall contain the materials for the current year plus the preceding two years, with a divider to separate the annual records.

7. Tools Used by Contractors

Staff shall conduct an inventory of all contractor tools upon their arrival and departure. The Chief of Security shall establish control procedures, particularly for restricted tools. The Chief of Security, facility maintenance supervisor and construction foreman shall maintain copies of all such inventories and control procedures.

8. Tools Purchased from Surplus Property

Tools purchased or acquired from surplus property shall be stored in the designated secure storage area. The responsible employee shall maintain a continual inventory of unmarked or excess tools returned to secure storage for issue or reissue. The tool control officer has sole authority to draw tools from this source. Any such tools kept in the tool control officer's storage area shall be registered in a continual

inventory.

9. Control and Inventory of Certain Items Not Classified as Tools

Other items that require strict property management controls, like weapons (other than firearms), chemical agents, restraints, other use-of-force and disturbance control equipment, binoculars, communication equipment and similar items shall be inventoried (with serial numbers), maintained, issued and disposed of in accordance with the procedures for tools established herein.

Control, inventory, maintenance and destruction of ICE firearms are governed by the ICE Interim Firearms Policy (7/7/2004).

10. Tool and Equipment Accountability

All tools and equipment shall be accounted for and documented on a regular basis.

K. Issuing Tools

Each facility shall have procedures in place for the issuance of tools to staff and detainees; security issues of restricted and unrestricted tools; and control of ladders, extension cords and ropes.

1. The Chief of Security shall issue a restricted tool only to the individual who shall be using it.
2. Detainees may use non-restricted tools under intermittent supervision; however, the detail supervisor shall account for all tools at the end of every work period.
3. A metal or plastic chit receipt shall be taken for all tools issued, and when a tool is issued from a shadow board, the receipt chit shall be visible on the shadow board.
4. The facility administrator shall establish site-specific procedures for the control of ladders, extension cords, ropes and hoses, according to the following procedures:

- a. *all ladders, extension cords, ropes and hoses over three feet long shall be stored in the designated location when not in use;*
 - b. *every staff member supervising the use of extension ladder and/or heavy equipment shall have at his/her disposal a portable two-way radio;*
 - c. *ladders shall be inventoried and stored by size to facilitate inspection and handling;*
 - d. *extension cords must be inventoried and have a metal or plastic tag attached, indicating issue number (by location) and length of cord;*
 - e. *extension cords longer than 10 feet shall be classified and handled as Class "R" tools; and*
 - f. *in high-rise facilities, electrical cords attached to buffers, vacuum cleaners, etc., may not exceed two feet.*
5. *Scissors used for in-processing shall be securely tethered to the fixture at which they are used.*
 6. *Issuance of tools from a storage location for a specified project for extended periods requires approval of the Chief of Security. The work detail supervisor shall conduct daily on-site checks of extended-use tools issued from the central tool room, and the facility maintenance supervisor shall conduct such checks monthly at a minimum.*

L. Lost Tools

The facility administrator shall develop and implement procedures governing lost tools, including, verbal and written notification to supervisory officials, addressing detainees with prior access to the tool(s) in question, and documentation and review.

1. *When a restricted or non-restricted tool is missing or lost, staff shall notify a supervisor immediately and the Chief of Security in writing as soon as possible.*
2. *When the tool is a restricted (class "R") tool, staff shall inform the shift supervisor orally immediately upon discovering the loss. A. Any detainee(s) who may have had access to the tool shall be held at the work location pending completion of a thorough search.*
3. *When a medical department tool or equipment item is missing or lost, staff shall immediately inform the HSA, who shall make the immediate verbal notification to the Chief of Security or shift supervisor and written notification to the facility administrator.*
4. *The shift supervisor's office shall maintain a lost-tool file, monitor the individual reports for accuracy, ascertain any unusual patterns or occurrences of loss in one or more shops, document search efforts, and send written notification to the Chief of Security.*
5. *On the day a tool is recovered, staff shall complete the lost or missing tool report and send copies to the Chief of Security and shift supervisor.*
6. *The facility administrator shall implement quarterly evaluations of lost/missing tool files, reviewing the thoroughness of investigations and efforts to recover tools. Documentation of the quarterly evaluations shall be maintained on the right side of the tool inventory folder for the shop or area concerned.*

M. Disposition of Excess Tools

All broken or worn-out tools shall be surveyed and destroyed in accordance with the written procedures established by the facility administrator.

- 1. The tool control officer or security officer shall implement procedures for storing broken and/or worn-out tools in a secure area, pending survey and disposition.*
- 2. Excess tools not being surveyed shall remain in a designated secure storage area until included in a subsequent survey or returned to use.*
- 3. To maintain tool inventories at the most efficient operating level, staff in every shop and department shall identify and move to a secure storage area all rarely used tools. Bin cards shall account for the tools moved from shop to storage areas.*
- 4. Either the tool control officer or security key control officer shall be responsible for destroying all surveyed tools.*
- 5. The office of the Chief of Security shall maintain records of all tool surveys.*

N. Private/Contract Repair and

Maintenance Workers

Before entering or leaving the facility, all visitors, including repair and maintenance workers who are not ICE/ERO or facility employees, shall submit to an inspection and inventory of all tools, tool boxes and equipment that could be used as weapons.

Contractors shall retain a copy of the tool inventory while inside the facility.

An officer shall accompany non-employee workers in the facility to ensure that security and safety precautions and procedures are followed at all times, including removing tools at the end of each shift.

Before a detainee, employee, or contractor may enter a housing unit, the housing officer shall inventory tools and similar items to be carried into that unit and then, before departure from the unit, verify their removal in a second inventory. The housing officer shall immediately report discrepancies to the shift supervisor.