



**U.S. Immigration
and Customs
Enforcement**

MAR 16 2005

MEMORANDUM FOR: Ronald Smith
Field Office Director
San Diego Field Office

FROM: [REDACTED] b6, b7C
[Signature] Acting Director

SUBJECT: Plan of Action- El Centro Service Processing Center

This office is in receipt of the Plan of Action (POA) for the El Centro Service Processing Center in response to the detention review conducted on July 27-29, 2004. The POA is accepted and this review is considered closed.

The Field Office Director must initiate the following action in accordance with Detention Management Control Program (DMCP):

The Field Office Director, Detention and Removal Operations, shall notify the facility within five business days of receipt of this memorandum, that the POA has been accepted and the review closed. Notification shall include a copy of this memorandum.

Should you or your staff have any questions regarding this matter, please contact Deputy Assistant Director, Detention Management Division at (202) 305 [REDACTED]

b6, b7C

b2 high



**U.S. Immigration
and Customs
Enforcement**

MEMORANDUM FOR:

b6, b7C

Acting Deputy Assistant Director
Detention Management Division

FROM:

Ronald J. Smith
Ronald J. Smith
Field Office Director

SUBJECT:

Follow-up Action Plan/Headquarters Review National
Detention Standards.

Hold Rooms – Repeat Deficiency:

- *Detainees are held in Hold Rooms for more than 12 hours.*

The facility has been able to dedicate a dormitory to function as a pre-housing staging area for new arrivals. This initiative has allowed the facility to drastically reduce the number of instances wherein a detainee would be held in hold rooms in excess of 12 hours. In the event the 12 hour rule is exceeded, a memorandum must be prepared and forwarded through channels by the on duty Supervisory Immigration Enforcement Agent (SIEA) to the OIC citing reasons for infraction.

Food Service – Deficient:

- *Poor sanitation conditions*
- *Staff and detainees consume food in preparation areas*
- *Detainees' shoes are stored throughout food service area*
- *Broken refrigeration unit in use*

The sanitation conditions pointed out by the review team were immediately corrected.

The consumption of food in the Dining Facility's food preparation area is strictly prohibited. Employees as well as detainee workers are aware (through continuous training provided) that it is a health code violation to deviate from this policy. Food service and operations staff will continuously monitor this situation to ensure adherence. Additionally, signs will be posted throughout the food preparation area as a constant reminder. It has also been emphasized that any deviation from this policy will be dealt with immediately- **no exceptions**.

The facility has provided the food service department with a shoe rack located in the utility area. The shoe rack provides detainees an appropriate location to store their shoes, eliminating the need of leaving footwear in the dried food storage area.

The broken refrigeration unit identified has been removed from the facility. The food service department has installed Dixon digital thermometers and recorders in every refrigerator and

SUBJECT: Follow-up Action Plan/Headquarters Review – National Detention Standards
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freezer. The thermometer and recorder continually records temperatures, providing record of temperature fluctuations. The thermometers and recorders are continually checked through out the day. A log sheet is maintained in an effort to record dates/times employees conduct refrigerator and freezer inspections.

Collapsible Steel Batons:

Collapsible steel batons are no longer permitted inside the facility. All staff members have been advised by memorandum, and are presently in compliance with this mandate.



**U.S. Immigration
and Customs
Enforcement**

Oct 15, 2004

MEMORANDUM FOR: Ron Smith
Field Office Director
San Diego Field Office

FROM: [REDACTED] b6, b7C
Acting Director

SUBJECT: Review Summary Report for El Centro Service Processing Center

The Headquarters Office of Detention and Removal Operations (HQDRO) performed a detention operations review of the El Centro Service Processing Center on July 27 - 29, 2004, at El Centro, California. A rating of **Acceptable** has been assigned.

This rating was based on the Reviewer-In-Charge (RIC) Summary Memorandum and supporting documentation. The San Diego Field Office must correct the deficiencies noted in the RIC memorandum and initiate the following actions in accordance with the Detention Management Control Program:

- 1) The Field Office Director, Detention and Removal Operations, shall notify the facility **within** five business days of receipt of this memorandum. Notification shall include copies of the Form G-324A, *Detention Facility Review Form*, the G-324A worksheet, RIC Summary Memorandum, and a copy of this memorandum.
- 2) The Field Office Director is responsible for ensuring that the facility responds to all findings and a plan of action is submitted to the Review Authority (RA) within 30 days.
- 3) Once a plan of action is approved, the Field Office Director shall schedule and follow up on the above noted deficiencies within 90 days of receipt of the facility's plan of action.

Should you or your staff have any questions regarding this matter, please contact [REDACTED] b6, b7C, Acting Deputy Assistant Director, Detention Management Division at (202) 305 [REDACTED] b2 high

cc: Deputy Assistant Director, Field Operations Division



U.S. Immigration
and Customs
Enforcement

MEMORANDUM FOR:

b6, b7C

Acting Director

FROM:

b6, b7C

b6, b7C

Detention and Deportation Officer
Detention Compliance Branch

SUBJECT:

Headquarters Detention Review - El Centro Service Processing Center

The Detention Compliance Unit performed a review of the El Centro Service Processing Center (SPC) on July 27-29, 2004. This review was performed under the supervision of

b6, b7C

Reviewer-In-Charge (RIC) with team members,

b6, b7C

b6, b7C

and **b6, b7C**. The Detention Compliance Unit last performed a review of the facility on January 27, 2003.

Type of Review:

This review is a scheduled Headquarters Review and was conducted to determine overall compliance with the Immigration and Customs Enforcement (ICE) National Detention standards.

Review Summary:

The American Correctional Association (ACA) does not currently accredit the El Centro SPC. The facility is accredited by the National Commission on Correctional Health Care and the Joint Accreditation Commission for Healthcare.

The following information summarizes those standards *not* in compliance. Each standard is identified and a short summary provided regarding standards or procedures not currently in compliance.

January 2004 Review

Acceptable - 33
Deficient - 2
Repeat Deficiency - 2
At-Risk - 0

July 2004 Review

Acceptable - 35
Deficient - 1
Repeat Deficiency - 1
At-Risk - 0

Hold Rooms - Repeat Deficiency:

- Detainees are held in Hold Rooms for more than 12 hours.

Hold Rooms have been a repeat deficiency at the facility for the past few years. The processing area Hold Room logs document that in some cases detainees are being held past the permitted 12 hours. The auditors were told the reason for the delay was due to current staffing levels. A review of the current vacancies does indicate the facility is not currently up to its authorized staffing level. The Officer in Charge (OIC) was aware of the problem and requires the Detention Management staff to write a memorandum of explanation every time detainees are in the processing Hold Rooms for more than 12 hours. The OIC aggressively pursues filling facility vacancies through the San Diego Field Office.

Food Service - Deficient:

- Poor sanitation conditions
- Staff and detainees consume food in preparation areas
- Detainees' shoes stored throughout food service area
- Broken refrigeration unit in use

The Food Service Department is extremely busy, on average preparing and serving approximately 1500 well balanced meals a day. The Food Service staff is to be commended for their success. However, the review team felt the sanitation levels in the kitchen were not up to standards. Poor sanitation conditions were observed on food service equipment, kitchen floors, and in floor drains. A review of the freezer temperature logs revealed that on one occasion the temperature of a freezer had risen to 64 degrees. When questioned, the Food Service Department was unable to determine how long the freezer had been above the acceptable temperature of 32 degrees. The review team was advised the food had been relocated to another working freezer rather than throwing it away.

Staff and detainees were observed consuming food in the food preparation areas and during the review numerous detainees' shoes were found stored throughout the food storage areas. The facility took immediate action to correct all deficiencies found by the reviewers.

Other Issues:

- **Collapsible Steel Batons:**

Collapsible steel batons are still carried by officers inside the facility as authorized by the OIC. OIC [REDACTED] b6, b7C stated that these batons were needed for the safety of his officers and that he has never seen nor received any written directive preventing the practice. The OIC advised that consistent with policy, only fully qualified officers are authorized to carry the collapsible steel batons.

- **American Correctional Association (ACA) Accreditation:**

The facility currently has a three-man team, working full time preparing the facility for accreditation. The team, headed by Supervisory Immigration Enforcement Agent [REDACTED] b6, b7C has completed 122 files and of those 66 have been reviewed, approved and signed into policy by the OIC. The team advised that they report monthly to the HQDRO ACA liaison, [REDACTED] b6, b7C and are confident with her assistance the facility will attain accreditation.

- **Construction:**

The administration area of the facility is currently under construction. The estimated completion date is scheduled for September. Four of the facility pods (Limo, Kilo, Nancy and Mike) were recently painted to improve the quality of life for detainees. There are no major renovation projects scheduled for the El Centro SPC.

RIC Observations:

- **Overall Cleanliness of the Facility:**

The overall sanitation of the facility (outside Food Service) was very good. Detainees were continuously observed cleaning throughout the review.

- **Staff Cooperation and Professionalism:**

The OIC and staff were very professional and all information requested was immediately provided. Staff was knowledgeable about their assigned posts and presented very professional demeanor. Mr. [REDACTED] b6, b7C and Mr. [REDACTED] b6, b7C were extremely helpful and assisted the team members throughout the review. Their knowledge of the National Detention Standards is an asset to the facility.

Subject: El Centro Service Processing Center Review Summary Report
Page 4

Recommended Rating and Justification:

It is the RIC recommendation that the facility receive a rating of "Acceptable." The El Centro SPC has made significant improvements since the last HQ review. These improvements have greatly improved the quality of life for detainees. The facility now fully complies with 35 of 37 standards.

RIC Assurance Statement:

It is the opinion of this RIC that the findings of compliance and non-compliance are documented on the G-324a inspection form and that it is supported by documentation in the review file.

U.S. Department Of Homeland Security
U.S. Immigration and Customs Enforcement

Detention Facility Review Form
Facilities Used Over 72 hours

ICE Service Processing Center
 ICE Contract Detention Facility
 ICE Intergovernmental Service Agreement

A. Current Inspection

Type of Review
 Field Office HQ Review
Date[s] of Review
July 27-29, 2004

Previous/Most Recent Review

Date[s] of Last Review
January 27 - 29th, 2004
Previous Rating
 Superior Good Acceptable Deficient At-Risk

B. Name and Location of Facility

Name
El Centro Service Processing Center
Address (Street and Name)
1115 N. Imperial Ave.
City, State and Zip Code
El Centro CA. 92243
County
Imperial
Name and Title of Chief Executive Officer (Warden/OIC/Superintendent)
[redacted] Officer-In-Charge
Telephone # (Include Area Code)
(760) 336- [redacted]
District
San Diego
Distance from District Office
120 miles

C. ICE Information

Name of Reviewer (Last Name, Title and Duty Station)
[redacted] / DDO / HQDRO
Last Name / Title of Team Members (Reviewers)
[redacted] / DO; Ramos / DO; Vachon / PHS
Controlling Field Office
SND
Nearest Field or Sub-Office
120 miles

D. CDF/IGSA Information Only

Contract Number	Date of Contract or IGSA
Basic Rates per Man-Day	
Other Charges: (If None, Indicate N/A)	
Estimated Man-days Per Year	

E. Accreditation Certificates

Accredited By:
ACA: NCCHC: JCAHO:
Date: Date: 1/2003 Date: 3/2003

F. Problems / Complaints (Copies must be attached)

The Facility is under Court Order or Class Action Finding
 Court Order Class Action Order
The Facility has Significant Litigation Pending
 Major Litigation Life/Safety Issues
Checked Box above requires a detailed written memorandum.

G. Facility History

Date Built
1975
Date Last Remodeled or Upgraded
Ongoing
Date New Construction / Bedspace Added
None
Future Construction Planned
 Yes No Date:
Current Bedspace Future Bedspace
Operational Level 500 544

H. Total Facility Population

Total Intake for previous 12 months
8,637
Total Mandays for Previous 12 months
12.20

Classification Level (ICE SPCs and CDFs Only)

	L-1	L-2	L-3
Adult Male	219	173	26
Adult Female	0	0	0

I. Facility Capacity

	Rated	Operational	Emergency
Adult Male	544	450	560
Adult Female			

Average Daily Population

	ICE	USMS	Other
Adult Male	430		
Adult Female	0		

Staffing Level

Security: [redacted] Support: [redacted]
b2 high b2 high

Significant Incident Summary Worksheet

For ICE to complete its Review of your facility, the following information must be completed prior to the scheduled review dates. The information on this form should contain data for the past twelve months in the boxes provided. The information on this form is used in conjunction with the ICE Detention Standards in assessing your Detention Operations against the needs of the ICE and its detained population. This form should be filled out by the facility prior to the start of any inspection.

<i>Incidents</i>	<i>Description</i>	Jan -- Mar	Apr -- Jun	Jul -- Sept	Oct -- Dec
Assault: Offenders on Offenders ¹	Types (Sexual ² , Physical, etc.)	2	2	2	3
	With Weapon	0	0	0	0
	Without Weapon	2	2	0	0
Assault: Detainee on Staff	Types (Sexual Physical, etc.)	1	0	0	1
	With Weapon	0	0	0	0
	Without Weapon	1	0	0	0
Number of Forced Moves, incl. Forced Cell moves ³		0	0	0	0
Disturbances ⁴		0	0	0	0
Number of Times Chemical Agents Used		0	0	0	0
Number of Times Special Reaction Team Deployed/Used		0	0	0	0
# Times Four/Five Point strains applied/used	Number/Reason (M=Medical, V=Violent Behavior, O=Other)	0	0	0	0
	Type (C=Chair, B=Bed, BB=Board, O=Other)	0	0	0	0
Offender / Detainee Medical Referrals as a result of injuries sustained.		1	2	1	2
Escapes	Attempted	0	0	0	0
	Actual	0	0	0	0
Grievances:	# Received	1	7	21	9
	# Resolved in favor of Offender/Detainee	1	3	18	8
Deaths	Reason (V=Violent, I=Illness, S=Suicide, A=Attempted Suicide, O=Other)	0	1-I	0	0
	Number	0	1	0	0
Psychiatric / Medical Referrals	# Medical Cases referred for Outside Care	5	7	27	43
	# Psychiatric Cases referred for Outside Care	1	0	3	1

¹ Any attempted physical contact or physical contact that involves two or more offenders

² Oral, anal or vaginal penetration or attempted penetration involving at least 2 parties, whether it is consenting or non-consenting

³ Routine transportation of detainees/offenders is not considered "forced"

⁴ Any incident that involves four or more detainees/offenders, includes gang fights, organized multiple hunger strikes, work stoppages, hostage situations, major fires, or other large scale incidents.

DHS/ICE Detention Standards Review Summary Report

1. Acceptable 2. Deficient

No Applicable / IGSAs Only

Legal Access Standards

	1.	2.	3.	4.
1. Access to Legal Materials	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
2. Group Presentations on Legal Rights	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
3. Visitation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
4. Telephone Access	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Detainee Services

5. Admission and Release	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
6. Classification System	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
7. Correspondence and Other Mail	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
8. Detainee Handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
9. Food Service	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
10. Funds and Personal Property	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
11. Detainee Grievance Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
12. Issuance and Exchange of Clothing, Bedding, and Towels	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
13. Marriage Requests	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
14. Non-Medical Emergency Escorted Trip	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
15. Recreation	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
16. Religious Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
17. Voluntary Work Program	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Health Services

18. Hunger Strikes	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
19. Medical Care	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Suicide Prevention and Intervention	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Terminal Illness, Advanced Directives and Death	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Security and Control

22. Contraband	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
23. Detention Files	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
24. Disciplinary Policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
25. Emergency Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
26. Environmental Health and Safety	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
27. Hold Rooms in Detention Facilities	<input type="checkbox"/>	<input type="checkbox"/>		
28. Key and Lock Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
29. Population Counts	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
30. Post Orders	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
31. Security Inspections	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
32. Special Management Units (Administrative Segregation)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
33. Special Management Units (Disciplinary Segregation)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
34. Tool Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
35. Transportation (Land management)	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
36. Use of Force	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
37. Staff / Detainee Communication	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
38. Detainee Transfer	<input type="checkbox"/>	<input type="checkbox"/>		
39. Detainee Search	<input type="checkbox"/>	<input type="checkbox"/>		

All findings (At-Risk, Repeat Deficiency and Deficient) require written comment describing the finding and what is necessary to meet compliance.

RIC Review Assurance Statement

By signing below, the Reviewer-In-Charge (RIC) certifies that all findings of noncompliance with policy or inadequate controls contained in the Review Report are supported by evidence that is sufficient and reliable. Furthermore, findings of noteworthy accomplishments are supported by sufficient and reliable evidence. Within the scope of the review, the facility is operating in accordance with applicable law and policy, and property and resources are efficiently used and adequately safeguarded, except for the deficiencies noted in the report.

Reviewer-In-Charge: (Print Name) b6, b7C	Signature b6, b7C
Title & Duty Location Detention & Deportation Officer- HQDRO	Date 08/03/04

Team Members

Print Name & Duty Location b6, b7C DO- Sioux Falls, Mn	Print Name & Duty Location b6, b7C n, PHS- Miami, Fl.
Print Name & Duty Location b6, b7C DO- Chicago, Il	Print Name & Duty Location

- RIC Rating Recommendation:**
- Superior
 - Good
 - Acceptable
 - Deficient
 - At-Risk

RIC Comments: It is the RIC recommendation that the facility receive a rating of "Acceptable." The El Centro Service Processing Center has made significant advances in critical areas bringing the facility into compliance. All but one previously noted deficiency has been corrected. New deficiencies noted in Food Service during the review were immediately corrected.

HEADQUARTERS EXECUTIVE REVIEW

Review Authority

The signature below constitutes review of this report and acceptance by the Review Authority. **FD/OIC/CEO will have 30 days from receipt of this report to respond to all findings and recommendations.**

HQDRO EXECUTIVE REVIEW: (Please Print Name)	Signature
b6, b7C	b6, b7C FON
Title	Date
Acting Director	10/15/04

- Final Rating:**
- Superior
 - Good
 - Acceptable
 - Deficient
 - At-Risk

Comments: It is the RIC recommendation that the facility receive a rating of "Acceptable." The El Centro SPC has made significant improvements since the last HQ review. These improvements have greatly improved the quality of life for detainees. The facility now fully complies with 35 of 37 standards.

Condition of Confinement Review Worksheet
(This document must be attached to each G-324a Inspection Form)
This Form to be used for Detention Reviews of SPCs

Headquarters Detention and Removal Operations



Headquarters and Field Operational Review Worksheets

Immigration and Customs Enforcement	
Name	<i>El Centro Service Processing Center</i>
Address (Street and Name)	<i>1115 North Imperial Ave.</i>
City, State and Zip Code	<i>Elcentro, Ca. 92243</i>
County	<i>Imperial</i>
Name and Title of Chief Executive Officer (Warden/OIC/Superintendent)	<i>[REDACTED], OIC</i> <small>b6, b7C</small>
Name and title of Reviewer-In-Charge	<i>[REDACTED]</i> <small>b6, b7C</small>
Date[s] of Review	<i>July 27-29, 2004</i>
Type of Review	<input checked="" type="checkbox"/> Headquarters <input type="checkbox"/> Operational <input type="checkbox"/> Special Assessment <input type="checkbox"/> Other

Department of Homeland Security
Immigration and Customs Enforcement
Office of Detention and Removal

Condition of Confinement Review Worksheet
(This document must be attached to each G-324a Inspection Form)
This Form to be used for Detention Reviews of SPCs

Headquarters Detention and Removal Operations



Detainee Services

Section I

ACCESS TO LEGAL MATERIALS

Policy: Facilities holding ICE detainees shall permit detainees' access to a law library, and provide legal materials, facilities, equipment and document copying privileges, and the opportunity to prepare legal documents.

Components	A	U	NA	Remarks
The facility provides a designated law library for detainee use.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The library contains a sufficient number of chairs, is well lit and is reasonably isolated from noisy areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The law library is adequately equipped with typewriter, computers or both and has sufficient supplies for daily use by the detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
There is a designated ICE employee responsible for ensuring the equipment is in good working order and supplies are adequately stocked.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recreation Specialist b6, b7C b6, b7C
Outside persons and organizations are permitted to submit published legal material for inclusion in the legal library. Outside published material is forwarded and reviewed by the ICE prior to inclusion.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The law library contains all materials listed in the "Access to Legal Materials" Standard, Attachment A. The listing of materials is posted in the law library.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The ICE office subscribes to updating Services where applicable and legal materials requiring updates are current.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
There is a designated ICE employee who inspects, updates, and maintain/replace legal material on a routine basis. The designee properly disposes outdated supplements and replaces damaged or missing material promptly.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
If material submitted by outside organizations need to be replaced, does the facility contact ICE?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees are offered a minimum 5 hours per week in the law library. Detainees are not required to forego recreation time in lieu of library usage. Detainees facing a court deadline are given priority use of the law library.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainees may also request extra time.
Detainees may request material not currently in the law library. Each request is reviewed and where appropriate an acquisition request is initiate and timely pursued. Request for copies of court decisions are accommodate within 3 – 5 business days.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Recreation Specialist retrieves any additional information requested.
The facility permits detainees to assist other detainees, voluntarily and free of charge, in researching and preparing legal documents, consistent with security.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The ICE ensures that illiterate or non-English-speaking detainees without legal representation receive more than access to English-language law books after indicating their need for help.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees may retain a reasonable amount of personal legal material in the general population and in the special management unit. Stored legal materials are accessible within 24 hours of a written request.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

ACCESS TO LEGAL MATERIALS

Policy: Facilities holding ICE detainees shall permit detainees' access to a law library, and provide legal materials, facilities, equipment and document copying privileges, and the opportunity to prepare legal documents.

Components	A	U	NA	Remarks
Detainees housed in Administrative Segregation and Disciplinary Segregation units have the same law library access as the general population, barring security concerns. Detainees denied access to legal materials are documented and reviewed routinely for lifting of sanctions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	One hour daily during the afternoon.
All denials of access to the law library fully documented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No denials noted, log empty.
ICE Management is aware of each instance where detainees are denied access to the law library or law materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Indigent detainees are provided with free envelopes and stamps for mail related to legal matters. Indigent detainees may mail up to 3 first class letters at no charge while in ICE custody.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees who seek judicial relief on any matter are not subjected to reprisals, retaliation, or penalties.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable
 Deficient
 At-Risk
 Repeat Deficiency

Remarks: (Record significant facts, observations, alternate source used for verification, etc.)

Two security guards are posted whenever detainees are in the law library. Most detainees request materials on how to appeal their criminal convictions. The Recreation Specialist provides any additional information needed by the detainees as requested.

b6, b7C

b6, b7C

7/29/04

Auditor's Signature / Date

ADMISSION AND RELEASE

Policy: All detainees will be admitted and released in a manner that ensures their health, safety, and welfare. The admissions procedure will, among other things include: medical screening; a file-based assessment and classification process; a body search; and a search of personal belongings, which will be inventoried, documented, and safeguarded as necessary.

Components	Yes	No	NA	Remarks
In processing includes an orientation session. At a minimum, orientation addresses: Unacceptable activities and behavior, and corresponding sanctions. How to contact his/her deportation officer. The availability of <i>pro bono</i> legal services, and how to pursue such services. Schedule of programs, services, daily activities, including visitation, telephone usage, mail service, religious programs, court procedures, access to and use of the law library and the general library; sick-call procedures, etc and the detainee handbook .	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainees are issued a handbook and attend an orientation video session.
Medical screenings are performed by a medical staff or persons who have received specialized training for the purpose of conducting an initial health screening.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Done by Public Health staff.
The accompanying documentation is used to identify and classify each new arrival?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainee Classification Form.
All new arrivals strip-searched in accordance with the "Detainee Search" standard. An officer of the same sex as the detainee conducts the search and the search is conducted in an area that affords as much privacy as possible.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Detainees are observed changing into SPC uniforms, but, not strip-searched. Strip-searches are conducted if there is probable cause.
The "Contraband" standard governs all personal property searches. IGSA's use or have a similar contraband standard. Staff prepares a complete inventory of each detainee's possessions. The detainee receives a copy.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Excess funds and valuables accounted for and safeguarded in accordance with the "Funds and Personal Property" standard or a similar policy for IGSA's and the detainee receives a receipt?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
During detainee in-processing staff inventories every item of personal property and baggage (except funds/valuables) using personal property inventory forms. Each detainee receives a receipt.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff completes Form I-387 or similar form for CDFs and IGSA's for every lost or missing property claim. IGSA facilities forward all I-387 claims to ICE.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees are issued appropriate and sufficient clothing and bedding for the climatic conditions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
For SPCs and CDFs clothes and wristbands are color-coded.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility provides and replenishes personal hygiene items as needed. Gender-specific items are available. ICE Detainees are not charged for these items.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No females' detainees in this SPC.
The admissions process includes the following components: <ul style="list-style-type: none"> • Classification. • Medical screening. • Inventory of personal effects. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

ADMISSION AND RELEASE

Policy: All detainees will be admitted and released in a manner that ensures their health, safety, and welfare. The admissions procedure will, among other things include: medical screening; a file-based assessment and classification process; a body search; and a search of personal belongings, which will be inventoried, documented, and safeguarded as necessary.

Components	Yes	No	NA	Remarks
All releases are coordinated with the ICE office of jurisdiction.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff completes paperwork/forms for release as required.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICE Staff enter all information on detainees admitted, released, or transferred into the Deportable Alien Control System (DACS).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable **Deficient** **At-Risk** **Repeat Deficiency**

*Remarks: (Record significant facts, observations, other sources used, etc.)

b6, b7C

b6, b7C

7/29/04

Auditors Signature / Date

CLASSIFICATION SYSTEM

Policy: All facilities will develop and implement a system according to which ICE detainees are classified. The classification system will ensure that each detainee is placed in the appropriate category, physically separated from detainees in other categories

Components	Yes	No	NA	Remarks
The facility has a system for classifying ICE detainees. In SPCs the system is the Objective Classification System specified in the ICE Standard. In CDFs the system is the ICE Objective Classification System or similar system. In IGSAs, an Objective Classification System or similar is used.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility classification system includes: <ul style="list-style-type: none"> • Classifying detainees upon arrival. • Separating individuals who cannot be classified upon arrival from the general population. • The first-line supervisor or designated classification specialist reviewing every classification decision. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The intake/processing officer reviews work-folders, A-files, etc., to identify and classify each new arrival.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	After classification, the files are forwarded to Deportations.
In SPCs and CDFs, staff assigns each detainee a color-coded uniform and wristband based on his/her classification level.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs every A-file includes original paperwork supporting the classification and the detention file contains a copy.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Copies not placed in detention files to support classification.
Staff uses only information that is factual, and reliable to determine classification assignments. Opinions and unsubstantiated/ unconfirmed reports may be filed but are not used to score detainees classifications.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Housing assignments are based on classification-level. Detainees are assigned to the least restrictive housing unit based and are not assigned more than one level higher or lower than their classification designation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees' meals are not based on classification designation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A detainee's classification-level does not affect his/her recreation opportunities. Detainees recreate with persons of similar classification designations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainee work assignments are based upon classification designations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The classification process includes reassessment/reclassification. Reassessments are conducted between 45 and 60 days after arrival and subsequent reassessments are completed every 60 to 90 days?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Copies of reclassifying documents are placed in detention files.
The classification system includes standard procedures for processing new arrivals' appeals. Only a designated supervisor or classification specialist has the authority to reduce a classification-level on appeal.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Classification appeals are resolved within five business days and detainees are notified of the outcome within 10 business days.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

CLASSIFICATION SYSTEM

Policy: All facilities will develop and implement a system according to which ICE detainees are classified. The classification system will ensure that each detainee is placed in the appropriate category, physically separated from detainees in other categories

Components	Yes	No	NA	Remarks
Classification designations may be appealed to a higher authority such as the Officer in Charge or equivalent.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The Detainee Handbook or equivalent for IGSA's explains the classification levels, with the conditions and restrictions applicable to each.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Handbook amendment placed in all housing areas as of 7/23/04.
The Detainee Handbook or equivalent for IGSA's specifies the procedures a detainee must follow to appeal his/her classification or request reclassification.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable
 Deficient
 At-Risk
 Repeat Deficiency

***Remarks:** (Record significant facts, observations, other sources used, etc.)

Detainees that cannot be classified are placed in Administrative Segregation until documents are received for proper classification. An Interoffice Memorandum is submitted to Deportations daily to retrieve the required information. If the files cannot be obtained, the detainees are reprocessed for removal by Deportations .

b6, b7C

b6, b7C

7/29/04

Auditor's Signature / Date

CORRESPONDENCE AND OTHER MAIL

Policy: All facilities will ensure that detainees send and receive correspondence in a timely manner, subject to limitations required for the safety, security, and orderly operation of the facility. Other mail will be permitted, subject to the same limitations. Each facility will widely distribute its guidelines concerning correspondence and other mail.

Components	Yes	No	NA	Remarks
The admission process includes informing detainees of the facility's correspondence and other mail policy.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Notification of the policy is made in the detainee handbook and for SPCs and CDFs in the detail required to comply with the ICE standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Each detainee receives a detainee handbook upon admittance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The rules for correspondence and other mail are posted in each housing or common area.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility provides key information in languages other than English; In the language(s) spoken by significant numbers of detainees. List any exceptions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spanish versions posted.
Incoming mail distributed to detainees on the day it is received by the facility and in no case more than 24 hours after it is received.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Logbook used.
Outgoing mail routinely delivered to the postal service within one day of its entering the internal mail system (excluding weekends and holidays).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Logbook used.
Staff records all priority, overnight, and certified mail delivered by the U.S.P.S. and all deliveries from commercial alternatives to the U.S.P.S.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Logbook entries verified.
Staff do not open and inspect incoming general correspondence and other mail (including packages and publications) without the detainee present unless documented and authorized by the Officer-In-Charge or equivalent for prevailing security reasons.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All incoming mail and packages are x-rayed.
Staff does not ever read incoming general correspondence without the OIC's prior approval.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff does not inspect incoming special Correspondence for physical contraband or to verify the "special" status of enclosures without the detainee present.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff is prohibited from reading or copying incoming special correspondence.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff are only authorized to inspect outgoing correspondence or other mail without the detainee present when there is reason to believe the item might present a threat to the facility's secure or orderly operation, endanger the recipient or the public, or might facilitate criminal activity. Inspection of outgoing special correspondence is done in the presence of the detainee and for contraband only.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Correspondence to a politician or to the media is processed as special correspondence and is not read or copied.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The official authorizing the rejection of incoming mail sends written notice to the sender and the addressee.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Entered in logbook.

CORRESPONDENCE AND OTHER MAIL

Policy: All facilities will ensure that detainees send and receive correspondence in a timely manner, subject to limitations required for the safety, security, and orderly operation of the facility. Other mail will be permitted, subject to the same limitations. Each facility will widely distribute its guidelines concerning correspondence and other mail.

The official authorizing censorship or rejection of outgoing mail provides the detainee with signed written notice.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	All outgoing mail is being sent-out.
Staff maintains a written record of every item removed from detainee mail. In SPCs and CDFs documentation is in accordance with the Standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The OIC monitors staff handling of discovered contraband and its disposition. Records are accurate and up to date.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Logbook verified.
The procedure for safeguarding cash removed from a detainee is effective. The amount of cash credited to detainee accounts is accurate. Discrepancies are documented and investigated. Standard procedure includes issuing a receipt to the detainee.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainees are given the maximum amount of \$40, any remaining balances are sent to properly for a receipt.
Detainee identity documents (e.g., passports, birth certificates) are maintained A-files. Only copies of detainee identity documents are maintained in other non-official files.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff provides the detainee an ICE-certified copy of his/her identity document(s) upon request.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff disposes of prohibited items found in detainee mail in accordance with the "Control and Disposition of Contraband" Standard or the similar prevailing policy in IGSA's.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Every indigent detainee has the opportunity to mail, at government expense: Correspondence about a legal matter: At least three other letters per week: Packages deemed necessary by ICE.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has a system for detainees to purchase stamps and for mailing all special correspondence and a minimum of 5 pieces of general correspondence per week.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainee mails are sent free of charge by SPC.
The facility provides writing paper, envelopes, and pencils at no cost to ICE detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable Deficient At-Risk Repeat Deficiency

***Remarks:** (Record significant facts, observations, other sources used, etc.)

The mail-officer, IEA [REDACTED] b6, b7C a appears to be very organized, this assignment on a rotational 30-day detail. All transactions in the mailroom is being document documented and mail is being delivered and sent out-timely

[REDACTED] b6, b7C

[REDACTED] b6, b7C

7/29/04

Auditor's Signature / Date

DETAINEE HANDBOOK

Policy: Every OIC will develop a site-specific detainee handbook to serve as an overview of, and guide to, the detention policies, rules, and procedures in effect at the facility. The handbook will also describe the services, programs, and opportunities available through various sources, including the facility, ICE, private organizations, etc. Every detainee will receive a copy of this handbook upon admission to the facility.

Components	Yes	No	NA	Remarks
Each SPC/CDF have a detainee handbook. Each IGSA has a detainee handbook or equivalent.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The detainee handbook is written in English and translated into Spanish or into the next most-prevalent Language(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs detainees are required to sign for them to ensure accountability.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook supplements the facility orientation video where one is provided.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All staff members receive a handbook and training regarding the handbook contents.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook is revised as necessary and there are procedures in place for immediately communicating any revisions to staff and detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Information and changes distributed by daily information sheets and staff meetings.
There an annual review of the handbook by a designated committee or staff member.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The detainee handbook address the following issues: <ul style="list-style-type: none"> • Personal Items permitted to be retained • by the detainee. • Initial issue of clothes. • Personal hygiene items issued. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The detainee handbook states in clear language basic detainee responsibilities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook identifies: Initial issue of clothing and bedding and initial issue of personal hygiene items.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook states when a medical examination will be conducted.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Within 14 days.
The handbook describes the facility, housing units, dayrooms, In-dorm activities and special management units.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes; Official count times and count procedures Meal times, feeding procedures, procedures for medical or religious diets, additional information, Smoking policy, Clothing exchange schedules and if authorized, clothes washing and drying procedures and expected personal hygiene practices.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describe times and procedures for obtaining disposable razors and allows that detainees attending court will be afforded the opportunity to shave first.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes barber hours and hair cutting restrictions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Done during recreation periods. Barber is a detainee. Haircuts are free.
The handbook describes; the telephone policy, debit card procedures, direct and frees calls; Locations of telephones; Policy when telephone demand is high; Policy and procedures for emergency phone calls, and the Detainee Message System.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

DETAINEE HANDBOOK

Policy: Every OIC will develop a site-specific detainee handbook to serve as an overview of, and guide to, the detention policies, rules, and procedures in effect at the facility. The handbook will also describe the services, programs, and opportunities available through various sources, including the facility, ICE, private organizations, etc. Every detainee will receive a copy of this handbook upon admission to the facility.

Components	Yes	No	NA	Remarks
The handbook addresses religious programming.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook states times and procedures for commissary or vending machine usage. (where available)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No commissary, vending machine available.
The handbook describes the detainee voluntary work program procedures and pay procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes the library location and hours of operation and law library procedures and schedules.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes; attorney visitation hours; Location of the list of pro bono legal organizations; Group legal rights presentations schedule and sign up procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes the facility search procedures and contraband policy.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes the facility visiting hours and schedule and visiting rules and regulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes the correspondence policy and procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes the detainee disciplinary policy and procedures: Including: <ul style="list-style-type: none"> • Prohibited acts and severity scale sanctions. • Time limits in the Disciplinary Process. • Summary of Disciplinary Process. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes the detainee grievance procedures including appeals.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The detainee handbook describes the sick call procedures for general population and segregation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes the facility recreation policy including: <ul style="list-style-type: none"> • Outdoor recreation hours. • Indoor recreation hours. • In dorm leisure activities. • Rules for television viewing. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes the detainee dress code for daily living; Work assignments and in SPCs and CDFs the meaning of color-coded uniforms.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook specifies the rights and responsibilities of all detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable
 Deficient
 At-Risk
 Repeat Deficiency

***Remarks:** (Record significant facts, observations, other sources used, etc.)

The detainee handbook is very informative and covers the majority of all the required topics listed in the standard. The staff is very receptive in adding needed information and current revisions are placed in all affected areas.

b6, b7C

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7/29/04

Auditor's Signature / Date

FOOD SERVICE

Policy: Every facility will provide detainees in its care with nutritious and appetizing meals, prepared in accordance with the highest sanitary standards.

Components	Yes	No	NA	Remarks
The food service program is under the direct supervision of a professionally trained and certified service administrator.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The CS is in charge of all operations.
In larger facilities the Cook Supervisor (CS) assists the FSA in day-to-day management of food service operations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Responsibilities of cooks and cook foremen are in writing. The FSA determines the responsibilities of the Food Service Staff.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The position descriptions are kept in the CS office.
The CS is on duty on days when the FSA is off duty and vice versa.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The CS and FS Supervisor alternate.
The FSA provides food service employees with training that specifically addresses detainee-related issues. <ul style="list-style-type: none"> • In ICE Facilities this includes a review of the ICE "Food Service" standard 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Knife cabinets close with an approved locking device and the on-duty cook foreman maintains control of the key that locks the device.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All knives not in a secure cutting room are physically secured to the workstation and staff directly supervises detainees using knives at these workstations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The FSA/CS monitor the condition of knives and dining utensils.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Special procedures govern the handling of food items that pose a security threat.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Standard operating procedures include daily searches (shakedowns) of detainee work areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Food service personnel conduct shakedowns along with detention staff.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The FSA monitor staff's implementation of the facilities counting procedures. These procedures in written form and staff are trained in counting procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The detainees assigned to the food service department look neat and clean. Their clothing and grooming comply with the "Food Service" standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The FSA annually reviews detainee-volunteer job descriptions to ensure they are accurate and up-to-date.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Level 1 only.
The CS instructs newly assigned detainee workers in the rules and procedures of the food service department.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Training includes workplace-hazard recognition and deterrence. <ul style="list-style-type: none"> • Training covers the safe handling of every hazardous material the detainee are likely to encounter in their work. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

FOOD SERVICE

Policy: Every facility will provide detainees in its care with nutritious and appetizing meals, prepared in accordance with the highest sanitary standards.

Components	Yes	No	NA	Remarks
During orientation and training session(s), the CS explains and demonstrates: <ul style="list-style-type: none"> • Safe work practices and methods. • Safety features of individual products/ pieces of equipment. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The CS documents all training in individual detainee detention files?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees are paid in accordance with the "Voluntary Work Program" standard or prevailing IGSA standards.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	\$1 a day.
Detainees are served at least two hot meals every day. No more than 14 hours elapse between the last meal served and the first meal of the following day.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Served 3 hot meals daily.
<u>IN SPCs only:</u> The ICE supervisor on duty ensure that ICE officers participate in dining room supervision.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	2-security guards- 1 IEA and 1 contract guard (AKAL Security).
A transparent "sneeze guard" protects both the serving line and salad bar line.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A stainless steel wall enclosure is used.
The facility has a standard 35-day menu cycle. IGSA's use a 35-day or similar system for rotating meals.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The FSA or facility considers the ethnic diversity of the facility's detainee population when developing menu cycles. (Provide examples)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A registered dietitian conducts a complete nutritional analysis of every master-cycle menu planned.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Dietitian's License seen and verified.
Are menus sometimes adopted without the dietitian's certification? <ul style="list-style-type: none"> • If yes, under what circumstances 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If the food supply is interrupted and the needed items are not available.
The CS has established procedures to ensure that items on the master-cycle menu are prepared and presented according to approved recipes.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Does the CS have the authority to change menu items if necessary? <ul style="list-style-type: none"> • If yes, documenting each substitution, along with its justification • With copy to FSA 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All staff and volunteers know and adhere to written "food preparation" procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees whose religious beliefs require the adherence to particular religious dietary laws are referred to the Chaplain or FSA.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The detainees are issued a special meal card that is approved by the Chaplain.

FOOD SERVICE

Policy: Every facility will provide detainees in its care with nutritious and appetizing meals, prepared in accordance with the highest sanitary standards.

Components	Yes	No	NA	Remarks
<p>A common-fare menu available to detainees whose dietary requirements cannot be met on the main.</p> <ul style="list-style-type: none"> • Changes to the planned common-fare menu can be made at the facility level. • Hot entrees are offered three times a week. • The common-fare menus satisfy nutritional recommended daily allowances (RDAs). • Staff routinely provides hot water for instant beverages and foods. • Common-fare meals are served with: • Disposable plates and utensils? • Reusable plates and utensils? • Staff use separate cutting boards, knives, spoons, scoops, etc., to prepare the common-fare diet items. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>A Supervisor at the command level must approve a detainee's removal from the Common-Fare Program.</p> <ul style="list-style-type: none"> • Under what circumstances? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If recommended by the appropriate parties i.e., Medical, Chaplain.
<p>The OIC, in conjunction with the Chaplain and/or local religious leaders, provide the FSA a schedule of the ceremonial meals for the following calendar year.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>The common-fare program accommodates detainees abstaining from particular foods or fasting for religious purposes at prescribed times of the year.</p> <ul style="list-style-type: none"> • Muslims fasting during Ramadan receive their meals after sundown? • Jews who observe Passover but do not participate in the Common-Fare Program receive the same Kosher-for- Passover meals as those who do participate. • Main-line offerings include one meatless meal (lunch or dinner) on Ash Wednesday and Fridays during Lent. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>IN SPCs the FSA prepares quarterly cost estimates for the Common Fare Program.</p> <ul style="list-style-type: none"> • This quarterly estimate is factored into the quarterly budget. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CS, b6, b7C prepares this report.
<p>The food service program addresses medical diets.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Special meal cards are issued by medical.
<p>Satellite-feeding programs follow guidelines for proper sanitation.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Boxed meals served for infirmary patients & processing area detainees.
<p>Hot and cold foods are maintained at the prescribed, "safe" temperature(s) after two hours.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>All meals provided in nutritionally adequate portions.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>Food is not used to punish or reward detainees based upon behavior.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>ICE SPCs and CDFs, a member of the food service staff prepares the sack lunches for detainee transportation.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

FOOD SERVICE

Policy: Every facility will provide detainees in its care with nutritious and appetizing meals, prepared in accordance with the highest sanitary standards.

Components	Yes	No	NA	Remarks
The food service staff instructs detainee volunteers on: <ul style="list-style-type: none"> • Personal cleanliness and hygiene; • Sanitary techniques for preparing, storing, and serving food, and; • The sanitary operation, care, and maintenance of equipment. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Everyone working in the food service department complies with food safety and sanitation requirements. <ul style="list-style-type: none"> • If not, explain non-compliance. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Equipment not being cleaned properly and trash found underneath sink-tables & freezers.
Standard operating procedures include weekly inspections of all food service areas, including dining and food-preparation areas and equipment. <ul style="list-style-type: none"> • who conducts the inspections? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The FS Supervisor, b6, b7C or staff/cooks.
Either the FSA or the CS inspects all food service areas once every week.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Equipment is inspected for compliance with health and safety codes and regulations. <ul style="list-style-type: none"> • How often? • When was the most recent inspection? • Which agency conducted the inspection? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Inspected by food service staff.
Reports of discrepancies are forwarded to the OIC or AOIC and corrective action is scheduled and completed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Standard procedure includes checking and documenting temperatures of all dishwashing machines during each meal.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff documents the results of every refrigerator/freezer temperature check.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Temperature spike noted on freezer.
The cleaning schedule for each food service area is conspicuously posted.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Do procedures include inspecting all incoming food shipments for damage, contamination, and pest infestation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>ICE SPCs and CDFs</u> Staff complies with the ICE requirements for "food receipt and storage."	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Shoes being stored near the food storage and kitchen areas.
<u>ICE SPCs and CDFs</u> Are stock inventory levels periodically monitored and adjusted to correct overage and shortage problems?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Storage areas are locked.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>ICE SPCs and CDFs</u> staff complies with all ICE "Housekeeping, Storeroom/Refrigerator" requirements <ul style="list-style-type: none"> • Identify and explain shortcomings. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See Comments.

Standard Rating:

Acceptable Deficient At-Risk Repeat Deficiency

***Remarks:** (Record significant facts, observations, other sources used, etc.)

HOUSEKEEPING: Shoes were being stored in the kitchen area. On the third day of inspection, several food preparation equipment still had little pieces of meat, carrot, lettuce and grease left on the machines

after being cleaned. Trash was found stuffed underneath the freezer and sink-table in the food-serving area. The catch area under the range contained remnants of prepared food. These discrepancies were immediately corrected. However, these problems were occurred on a daily basis during the inspection on different sets of equipment. Better supervision by the kitchen staff and attention to detail is needed to remedy this deficiency.

STOREROOM: Shoe storage remained to be problem in this area, as detainees need to switch from their uniform shoes to safety boots as a precaution. A proposed shoe/boot storage rack has been submitted for either purchase or furnished by the Maintenance department.

FREEZER: There was an instance when the freezer was recorded to have a temperature of sixty-four degrees. The time differential was unknown per the equipment check logs. As a result, the stored food was transferred to another freezer. However, since it is unknown how long the freezer was out of range. The food should have been thrown away as a safety precaution. There was a detainee grievance that possibly related to a food borne illness. New thermometers have been ordered to closely monitor these temperature changes. These thermometers will be able to record the temperatures on a continuous basis.

BROKEN REFRIGERATOR: The refrigerator in the serving area has a broken thermostat; however, milk, fruit and drinks is being stored and the temperature is being check with a hand held thermometer. Since the refrigerator is supposed to be inoperable, the temperature checks are not being recorded as well since it's suppose to be out of commission.

MAINTENANCE CONCERNS: Several ceiling tiles were missing and the thermostat for the air conditioning was malfunctioning. Electric fans and extension cords were being used in the dishwashing room for the comfort of the workers. However, since this area generally wet, the extension cords and fans posed as an electrocution hazard. The maintenance department immediate replaced the missing ceiling tiles, repaired the thermostat, and removed the electric fans and extension cords.

b6, b7C

b6, b7C

S 7/29/04

Auditors Signature / Date

FUNDS AND PERSONAL PROPERTY

Policy: All facilities will implement procedures to control and safeguard detainees' personal property. Procedures will provide for the secure storage of funds, valuables, baggage and other personal property; the documentation and receipting of surrendered property; and the initial and regularly scheduled inventorying of all funds, valuables, and other property.

Components	Yes	No	NA	Remarks
Detainee funds and valuables are properly separated and stored away. Detainee funds and valuables are accessible to designated supervisor(s) only.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees' large valuables are secured in a location accessible to designated supervisor(s) or processing staff only.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff itemizes the baggage and personal property of arriving detainees, including funds and valuables. For IGSA's and CDFs, using a personal property inventory form that meets the ICE standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
IN SPCs and CDFs staff gives the detainee the original inventory form, filing copies in the detainee's detention file and the personal property container.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff forwards an arriving detainee's medicine to the medical staff.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff searches arriving detainees and their personal property for contraband.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICE SPCs and CDFs staff obtains a forwarding address from each detainee. IN IGSA's, district staff obtains a forwarding address from each detainee.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Information listed in detention file.
There is a written policy for returning forgotten property to detainees and staff follows procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Forwarded to detainees designated address.
In SPCs and CDFs it is standard procedure for two officers to be present when removing/documenting the removal of funds from a detainee's possession.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICE SPCs and CDFs staff issues and maintains property receipts (G-589s) in numerical order. (CDFs may use a similar form if not specified in the contract)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs staff completes and distributes the G-589 in accordance with the ICE standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In ICE SPCs and CDFs the processing officer records each G-589 issuance in a G-589 logbook. The record includes the initials and star numbers of receipting officers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In ICE SPCs and CDFs staff tags large valuables with both a G-589 and an I-77?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In ICE SPCs and CDFs the supervisor verifies the accuracy of every G-589.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Verified every morning when valuables are removed from the safe to the property room.
In ICE SPCs and CDFs the supervisor ensures that: <ul style="list-style-type: none"> • Detainee funds are, without exception, deposited into the cash box; • Every property envelope is sealed. • All sealed property envelopes are placed in the safe. • Large, valuable property is kept in the secured locked area. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In ICE SPCs and CDFs staff tags every baggage/facility container with an I-77, completed in accordance with the ICE standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

FUNDS AND PERSONAL PROPERTY

Policy: All facilities will implement procedures to control and safeguard detainees' personal property. Procedures will provide for the secure storage of funds, valuables, baggage and other personal property; the documentation and receipting of surrendered property; and the initial and regularly scheduled inventorying of all funds, valuables, and other property.

In ICE SPCs and CDFs staff secures every container used to store property with a tamper-proof numbered strap.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Straps are numbered and entered in detention file.
In SPCs and CDFs a logbook records detainee name, A- number/detainee-number, baggage-check/ I-77 number, security tie-strap number, property description, date issued and date returned.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Property discrepancies are immediately reported to the CDEO or Chief of Security.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the DOS (or equivalent) accompanied by a detention staff member conduct a comprehensive weekly audit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Accompanied by Administrative DOS.
In SPCs and CDFs the OIC has established quarterly audits of baggage and non-valuable property as facility policy, the audits occur each quarter and audits are entered in the daily log.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Entered by Admin DOS.
The facility positively identifies every detainee being released or transferred. In SPCs and CDFs in accordance with the ICE standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff follows written procedures when returning property to detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff routinely informs supervisors of lost/damaged property claims. Claims are properly investigated and missing or damaged property claim reports are filed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs every lost/damaged property report completed in accordance with the ICE standard on an I-387 (or equivalent). The OIC receives a copy and staff places the original in the detainee's A-file, retaining a copy in facility files.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The SPC uses the Form SF-95 for all detainee missing/damaged property claims against the government. The claimant signs every SF-95.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
CDF/IGSA facility procedures for handling detainee property claims are similar with the ICE standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility attempts to notify an out-processed detainee that he/she left property in the facility. <ul style="list-style-type: none"> • By sending written notice to the detainee's last known address; • Via certified mail; • The notice state that the detainee has 30 days in which to claim the property, after which it will be considered abandoned. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility disposes of abandoned property in accordance with written procedures. <ul style="list-style-type: none"> • If an SPC, in accordance with the ICE standard (based on ICE' "Personal Property Operations Handbook") • If a CDF/IGSA facility, written procedure requires the prompt forwarding of abandoned property to ICE. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable
 Deficient
 At-Risk
 Repeat Deficient

Remarks: *(Record significant facts, observations, other sources used, etc.)*

b6, b7C

b6, b7C 7/29/04

Auditor's Signature / Date

GROUP LEGAL RIGHTS PRESENTATIONS

Policy: Facilities housing ICE detainees shall permit authorized persons to make presentations to groups of detainees for the purpose of informing them of U.S. immigration law and procedures, consistent with the security and orderly operation of each facility. ICE encourages such presentations, which instruct detainees about the immigration system and their rights and options within it

Components	Yes	No	NA	Remarks
The ICE/OIC is responsive to requests by attorneys and accredited representatives for group presentations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Upon receipt of concurrence by the District Director, the OIC ensures proper notification to attorneys or accredited representatives in a timely manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility follows policy and procedure when rejecting or requesting modifications to objectionable material provided or presented by the attorney or accredited representative.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Notified in writing.
Posters announcing presentations appear in common areas at least 48 hours in advance and sign-up sheets are available and accessible.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Documentation is submitted and maintained when any detainee is denied permission to attend a presentation and the reason(s) for the denial.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	All detainees attend.
When the number of detainees allowed to attend a presentation is limited, the facility allows a sufficient number of presentations so that all detainees signed up may attend.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Maximum of 70 detainees in general purpose room AKA dining room.
Detainees in segregation and unable to attend for security reasons may request separate sessions with presenters. Such requests are documented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Interpreters are admitted when necessary to assist attorneys and other legal representatives.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Presenters are afforded a minimum of one hour to make the presentation and to conduct a question-and-answer session.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff permits presenters to distribute ICE-approved materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility permits presenters to meet with small groups of detainees to discuss their cases after the group presentation. ICE Staff is present but do not monitor conversations with legal providers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Guards present for security purposes.
Group presenters who have had their privileges suspended are notified in writing by the OIC and the reasons for suspension are documented. The District Director is notified when a group or individual is suspended from making presentations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None to date.
The facility plays ICE-approved videotaped presentations on legal rights, at regular opportunities at the request of outside organizations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	None submitted by outside organizations.
A copy of the Group Legal Rights Presentation policy, including attachments, is available upon request	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable Deficient At-Risk Repeat Deficiency

Remarks: (Record significant facts, observations, alternate source used for verification, etc.)

b6, b7C

b6, b7C

7/29/04

Auditor's Signature/ Date

DETAINEE GRIEVANCE PROCEDURES

Policy: Every facility will develop and implement standard operating procedures (SOPs) for addressing detainee grievances in timely fashion. Each step in the process will occur within the prescribed time frame. Among other things, a grievance will be processed, investigated, and decided (subject to appeal) in accordance with the SOPs; a grievance committee will convene as provided in the SOPs. Standard procedure will include providing the detainee with a written response to any formal grievance, which will include the basis for the decision. The facility will also establish standard procedures for handling emergency grievances. All grievances will receive supervisory review. Reprisal against the filer of a grievance will not be tolerated.

Components	Yes	No	NA	Remarks
Written procedures provide for the informal resolution of oral grievances. <ul style="list-style-type: none"> • If yes, the detainee has up to five days within which to make his/her concern known to a member of the staff. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees have access to the grievance committee (or equivalent in IGSA), using formal procedures. <ul style="list-style-type: none"> • Detainees may seek help from other detainees or facility staff when preparing a grievance. • Illiterate, disabled, or non-English-speaking detainees receive special assistance when necessary. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs/CDFs, the detainee has five days after the incident or informal-grievance outcome to file a formal grievance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Every member of the staff knows how to identify emergency grievances, including the procedures for expediting them.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainee is escorted by to the SIEA immediately.
In SPCs and CDFs, when a Detainee does not accept the grievance committee's decision, he/she files an appeal with the ICE OIC. <ul style="list-style-type: none"> • In all facilities written procedures cover detainee appeals and are included in the detainee handbook 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
There are no documented substantiated cases of staff harassing, disciplining, penalizing, or otherwise retaliating against a detainee who lodges a complaint. <ul style="list-style-type: none"> • If yes, explain. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Procedures include maintaining a Detainee Grievance Log. <ul style="list-style-type: none"> • If not, an alternative acceptable record keeping system is maintained. • "Nuisance complains" are identified in the records. • For quality control purposes, staff documents nuisance complaints received but not filed. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff is required to forward any grievance that includes officer misconduct to a higher official or, in a CDF/IGSA facility, to ICE.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The admissions process includes providing each new arrival with a copy of the detainee handbook (or equivalent).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

DETAINEE GRIEVANCE PROCEDURES

Policy: Every facility will develop and implement standard operating procedures (SOPs) for addressing detainee grievances in timely fashion. Each step in the process will occur within the prescribed time frame. Among other things, a grievance will be processed, investigated, and decided (subject to appeal) in accordance with the SOPs; a grievance committee will convene as provided in the SOPs. Standard procedure will include providing the detainee with a written response to any formal grievance, which will include the basis for the decision. The facility will also establish standard procedures for handling emergency grievances. All grievances will receive supervisory review. Reprisal against the filer of a grievance will not be tolerated.

Components	Yes	No	NA	Remarks
The grievance section of the handbook explains all steps in the grievance process – Including: <ul style="list-style-type: none"> • Informal and formal grievance procedures; • The appeals process and step-by-step procedures; • <u>In CDFs/IGSA</u> facilities: procedures for filing an appeal with ICE. • Staff/detainee availability to help during the grievance process • Guarantee against staff retaliation for filing/pursuing a grievance. • How to file a complaint about officer misconduct with the Department of Justice. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable
 Deficient
 At-Risk
 Repeat Deficiency

***Remarks:** (Record significant facts, observations, other sources used, etc.)

b6, b7C

b6, b7C

S 1/29/04

Auditors Signature / Date

ISSUANCE AND EXCHANGE OF CLOTHING, BEDDING, AND TOWELS

Policy: ICE requires that all facilities housing ICE detainees provide clean clothing, bedding, linens and towels to every ICE detainee upon arrival. Further, facilities shall provide ICE detainees with regular exchanges of clothing, linens, and towels for as long as they remain in detention.

Components	Yes	No	NA	Remarks
The facility has a policy and procedure for the regular issuance and exchange of clothing, bedding, linens and towels. <ul style="list-style-type: none"> • The supply of these items exceeds the minimum required for the number of detainees. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	3 to 1 ratio of supplies to detainees.
All new detainees are issued clean, temperature-appropriate, presentable clothing during in processing. Detainees receive <ul style="list-style-type: none"> • One uniform shirt and one pair of uniform pants or one jumpsuit. • One pair of socks. • One pair of underwear (Daily change). • One pair of facility-issued footwear. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainees also issued hygiene-kits.
In SPCs and CDFs the uniform/jumpsuit is color-coded to reflect the detainee's classification level.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Level 1-Blue, Level 2-Orange, Level 3-Red.
Additional clothing is available for changing weather conditions or is seasonally appropriate.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
New detainees are issued clean bedding, linens and towel. They receive <ul style="list-style-type: none"> • One mattress • One blanket • One pillow • Two sheets • One pillowcase • One towel • Additional blankets are issued based on local weather conditions. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees assigned to special work areas are clothed in accordance with the requirements of the job.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees are provided clean clothing, linen and towels. <ul style="list-style-type: none"> • Socks and undergarments exchanged daily. • Outer garments at least twice weekly. • Sheets at least weekly. • Towels at least weekly. • Pillowcases at least weekly. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Food service detainee volunteer workers permitted to exchange outer garments daily.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Volunteer detainee workers are permitted to exchanges of outer garments more frequently.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable
 Deficient
 At-Risk
 Repeat Deficiency

Remarks: (Record significant facts, observations, other sources used, etc.)

b6, b7C

b6, b7C

S 4/29/04

Auditor's Signature / Date

MARRIAGE REQUESTS

Policy: All detainee marriage requests will receive case-by-case consideration from ICE management.

Components	Yes	No	NA	Remarks
The OIC/ICE considers detainee marriage requests on a case-by-case basis.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the OIC or highest-ranking ICE official on-site is the only officer authorized to approve a request to marry.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The ADD reviews every marriage request rejected by an OIC or IGSA. Rejections are documented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
It is standard practice to require a written request for permission to marry.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The written request includes a signed statement or comparable documentation from the intended spouse, confirming marital intent.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The OIC provides a written copy of his/her decision to the detainee and his/her legal representative.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
When permission is denied, the OIC states the basis for his/her decision.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The OIC provides the detainee with a place and time to make wedding arrangements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The detainee handbook (or equivalent) explains the marriage request process.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable
 Deficient
 At-Risk
 Repeat Deficient

***Remarks:** (Record significant facts, observations, other sources used, etc.)

b6, b7C

b6, b7C

7/29/04

Auditor's Signature / Date

NON-MEDICAL EMERGENCY ESCORTED TRIPS

Policy: The Immigration and Naturalization Service (ICE) may provide detainees with staff-escorted trips into the community for the purpose of visiting critically ill members of the detainee's immediate family, or for attending funerals.

Components	Yes	No	NA	Remarks
The OIC considers and approves, on a case-by-case basis, trips to immediate family member's: <ul style="list-style-type: none"> • Funeral • Deathbed 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Delegated to the Deportation Officer.
The facility recognizes mother, father, brother, sister, spouse, child, stepparent, and foster parent as "immediate family".	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The IGSA facility notifies ICE of all detainee requests for non-medical escorts.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	SPC facility.
The District Director is the approving official for non-medical escorted trips.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	OIC.
The detainee's Deportation Officer reviews the file before forwarding a detainee's request, with recommendation, to the approving official. Each recommendation addresses the individual's suitability for travel, e.g., the kind of supervision required?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees who require overnight housing placed in approved IGSA facilities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
At SPCs and CDFs, facility procedures comply with the following ICE Standards: <ul style="list-style-type: none"> • Non-Medical Emergency Escorted Trips • Transportation (Land Transportation) • Restraints applied strictly in accordance with the Use of Force standard. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Each escort includes at least two officers. <ul style="list-style-type: none"> • The detainee under constant, direct visual supervision of escorting staff. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The Chief Detention Enforcement Officer responsible for training escort officers to follow written procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Escorting officers report unexpected situations to the originating facility as a matter of procedure and the ranking supervisor on duty has the authority to issue instructions for completion of the trip.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Escorting officers have the discretion to: a. Increase or decrease minimum restraints in accordance with written instruction, procedures and classification level of the detainee.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Escort officer training includes ICE Firearms Policy, Section 20.012?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Escort officers do not accept gifts/gratuities from a detainee, detainee's relative or friend for any reason.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

NON-MEDICAL EMERGENCY ESCORTED TRIPS

Policy: The Immigration and Naturalization Service (ICE) may provide detainees with staff-escorted trips into the community for the purpose of visiting critically ill members of the detainee's immediate family, or for attending funerals.

Components	Yes	No	NA	Remarks
Escort officers ensure that detainees: <ul style="list-style-type: none"> • Conduct themselves in a manner that does not bring discredit to the ICE. • Do not violate federal, state, or local laws. • Do not purchase, possess, use, consume, or administer narcotics, other drugs, or intoxicants. • Do not arrange to visit family or friends unless approved before the trip. • Make no unauthorized phone calls. • Know they are subject to search, urinalysis, breathalyzer, or comparable test upon return to the facility. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Standard procedure requires the immediate return to the facility of any detainee who violates trip rules.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable
 Deficient
 Repeat Deficiency
 At-Risk

***Remarks:** (Record significant facts, observations, other sources used, etc.)

b6, b7C

b6, b7C

7/29/04

Auditor's Signature / Date

RECREATION

Policy: It is ICE policy to provide access to recreational programs and activities to all ICE detainees, to the extent possible, under conditions of security and supervision that protect their safety and welfare.

Components	Yes	No	NA	Remarks
The facility provide: <ul style="list-style-type: none"> • An indoor recreation program • An outdoor recreation program 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In each SPC and CDF the facility has a full-time: Recreational Specialist and recreational assistant where required by the standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recreation Specialist- b6, b7C
The recreational specialist tailors the program activities and offerings to the particular detainee population.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Suggestions gathered from detainee surveys.
Regular maintenance keeps recreational facilities and equipment in good condition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the recreational specialist supervises approved recreation activities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The recreational specialist supervises detainee recreation workers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Two level 2 detainees work in recreation.
The recreational specialist oversees recreation programs for Special Management Unit and special-needs detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Dayrooms offer sedentary activities, e.g., board games, cards, television.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Outside activities are restricted to limited-contact sports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Each detainee has the opportunity to participate in daily recreation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees have access to recreation activities outside the housing units for at least one hour daily, 5 days a week.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff checks all items for damage and condition when equipment is returned.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff conducts searches of recreation areas before and after use.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All recreation areas under constant staff supervision.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supervising staff is equipped with radios.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility provides detainees in the SMU at least one hour of recreation time daily.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees in disciplinary segregation receive a written explanation when a panel revokes his/her recreation privileges.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	When detainee poses a hazard to himself or others.
Does the OIC review the panel's decision before it becomes effective. If yes, in every case?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees in administrative segregation receive a written explanation for denied recreational privileges.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Volunteer groups present special programs or religious activities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Usually HIV and religious classes.
Volunteers are required to sign a waiver of liability before entering a secure portion of the facility where detainees are present.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Visitors, relatives or friends are not allowed to serve as volunteers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
If the facility has no outside recreation, are detainees considered for transfer after six months? <ul style="list-style-type: none"> • If yes, written procedures ensure timely review of all eligible detainees. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Outside recreation available.

RECREATION

Policy: It is ICE policy to provide access to recreational programs and activities to all ICE detainees, to the extent possible, under conditions of security and supervision that protect their safety and welfare.

Case officers make written transfer recommendations about every six-month detainee to the OIC.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
The OIC documents all detainee-transfer decisions, whether yes or no.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
The detainee's written decision for or against an offered transfer documented in his/her A-file.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Staff notifies the detainee's legal representative of his/her decision to accept/decline a transfer.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If no recreation is available, the ICE District routinely review transfer eligibility for all detainees after 60 days.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Does the A-file of every detainee is held more than 60 days without access to recreation contains either a transfer-waiver signed by the detainee or the OIC's written determination of the detainee's ineligibility for transfer.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
The detainee's legal representative is notified of the detainee's/OIC's decision.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Standard Rating:

Acceptable
 Deficient
 At-Risk
 Repeat Deficiency

Remarks:

b6, b7C

b6, b7C

7/29/04

Auditor's Signature / Date

RELIGIOUS PRACTICES

Policy: Facilities will provide ICE detainees of all faiths with reasonable and equitable opportunities to participate in the practices of their faith, limited only by the constraints of safety, security, the orderly operations of the facility and budgetary considerations.

Components	Yes	No	NA	Remarks
Detainees are allowed to engage in religious services.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Space is available for detainees to conduct religious services.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cafeteria eating area used as a general purpose room.
The facility allows detainees to observe the major "holy days" of their religious faith. a. List any exceptions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility accommodates recognized holy-day observances by: <ul style="list-style-type: none"> • Providing special meals, consistent with dietary restrictions. • Honoring fasting requirements. • Facilitating religious services. • Allowing activity restrictions. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Each detainee is allowed religious items in his/her immediate possession.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Volunteer's credentials are checked and verified before letting him/her participate in detainee programs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Members of faiths not represented by clergy conduct may request to present their own services within security allowances.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees in the Special Management Unit to participate in religious practices unless otherwise documented for the safety and security of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable Deficient At-Risk Repeat Deficiency

***Remarks:** (Record significant facts, observations, other sources used, etc.)

b6, b7C

b6, b7C

5/7/29/04

Auditor's Signature / Date

DETAINEE TELEPHONE ACCESS

Policy: All facilities housing ICE detainees will permit detainees' reasonable and equitable access to telephones.

Components	Yes	No	NA	Remarks
Detainees allowed access to telephones during established facility waking hours.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Upon admittance, detainees are made aware of the facility's telephone access policy.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Notification of this policy is in the detainee handbook.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The telephone access rules are posted in each housing area.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility makes a reasonable effort to provide key information to detainees in languages spoken by any significant portion of the facility's population.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spanish versions available.
Telephones are provided at a minimum ratio of one telephone per 25 detainees in the facility population.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	11 to 1 ratio.
Telephones are inspected regularly (daily in SPCs/CDFs), by designated facility staff, to ensure that they are in good working order.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility administration promptly reports out-of-order telephones to the facility's telephone service provider.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility administration monitors repair progress and take appropriate measures to ensure that the required repairs are begun and completed timely.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees are afforded a <i>reasonable degree of privacy</i> for legal phone calls.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A procedure exists to assist a detainee who is having trouble placing a confidential call.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility provides the detainees with the ability to make non-collect (special access) calls.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Calls made from staff telephone on case-by-case basis.
Special Access calls are at no charge to the detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In facilities unable to fully meet this requirement initially because of limitations of its telephone service, the ICE makes alternate arrangements to provide required access within 24 hours of a request by a detainee.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
No restrictions are placed on detainees attempting to contact attorneys and legal service providers who are on the approved "Free Legal Services List".	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Special arrangements are made to allow detainees to speak by telephone with an immediate family member detained in another SPC or CDF?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Use of general access phones is ordinarily not restricted.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Any restrictions are documented and fall within one of the categories in paragraph VIII section G?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has a system for taking and delivering detainee telephone messages.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainee Message Center.
Emergency phone call messages are immediately given to detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees are allowed to return emergency phone calls as soon as possible.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

DETAINEE TELEPHONE ACCESS

Policy: All facilities housing ICE detainees will permit detainees' reasonable and equitable access to telephones.

Components	Yes	No	NA	Remarks
Detainees in disciplinary segregation are allowed phone calls relating to the detainee's immigration case or other legal matters, including consultation calls.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees in disciplinary segregation are allowed phone calls to consular/embassy officials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees in disciplinary segregation allowed phone calls for family emergencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees in administrative segregation and protective custody afforded the same telephoning privileges as those in general population.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
When detainee phone calls are monitored, notification is posted by detainee telephones that phone calls made by the detainees may be monitored. Special Access calls are not monitored.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable
 Deficient
 At-Risk
 Repeat Deficiency

Remarks: (Record significant facts, observations, alternate source used for verification, etc.)

b6, b7C

b6, b7C

7/29/04

Auditor's Signature / Date

VISITATION

Policy: ICE shall permit detainees to visit with family, friends, legal representatives, special interest groups and the news media.

Components	Yes	No	NA	Remarks
There is a written visitation schedule and hours for general visitation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The visitation hours tailored to the detainee population and the demand for visitation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Upon admittance detainees are made aware of the facility's visitation policy and the hours of visitation for the following categories: general visitation (including visitation by minors), legal visitation, consultation visitation for expedited removal, consular visitation, and special family visits, in the detainee handbook.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The visitation schedule and rules are available to the public.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The hours for all categories of visitation are posted in the visitation waiting area.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A written copy of the rules regulating visitation and the hours of visitation is available to visitors.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A general visitation log is maintained.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The detainees are permitted to retain personal property item specified in the standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Paperwork only.
A visitor dress code is available to the public.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Visitors are searched and identified according to standard requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The requirement on visitation by minors is complied with.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
At facilities where there is no provision for visits by minors, the ICE arranges for visits by children and stepchildren, on request, within the first 30 days.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
After that time, on request, ICE considers a transfer, when possible, to a facility that will allow minor visitation. At a minimum, monthly visits are allowed.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Detainees in special housing afforded visitation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Legal visitation is available seven (7) days a week, including holidays?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
On regular business days legal visitation hours provide for a minimum of eight (8) hours per day and a minimum of four hours per day on weekends and holidays.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
On regular business days, detainees are given the option of continuing a meeting with a legal representative through a scheduled meal.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs, the facility has a written procedure allowing legal service providers and assistants to telephone the facility in advance of a visit to determine whether a particular detainee is detained in that facility. After consultation with a detainee, the attorney files the appropriate Form EOIR-28 with the court and a copy is maintained in the detainees file.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

VISITATION

Policy: ICE shall permit detainees to visit with family, friends, legal representatives, special interest groups and the news media.

The call ahead inquiry policy is available to legal service providers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Private consultation rooms are available for attorney meetings. There is a mechanism for the detainee and his/her representative to exchange documents.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Non-contact visits only in the main visitation area.
There are written procedures governing detainee searches. The procedure is also listed in the detainee handbook or equivalent.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
When strip searches are required after every contact visits with a legal representative, the facility provides an option for non-contact visits with legal representatives.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Non-contact visits only
Prior to each visit, legal service providers and assistants are identified per the standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The current list of <i>pro bono</i> legal organizations is posted in the detainee housing areas and other appropriate areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The decision to permit or deny a tour is not delegated below the level of District Director?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Delegated to the OIC.
Provisions for NGO visitation as stated in the Detention Standards are complied with.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Law enforcement officials, requesting to visit with a detainee, are referred to the OIC for approval.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Former detainees or aliens in proceedings, requesting to visit with a detainee, are referred to the OIC.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not allowed to visit.
Procedures are in place, consistent with the detention standard, for examinations by independent medical service providers and experts.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable
 Deficient
 At-Risk
 Repeat Deficiency

***Remarks:** (Record significant facts, observations, other sources used, etc.)

b6, b7C

b6, b7C ; 7/29/04

Auditor's Signature / Date

VOLUNTARY WORK PROGRAM

Policy: In every facility offering a voluntary work program, ICE detainees will have the opportunity to work and earn money by participating. While not legally required, ICE affords detainee workers basic Occupational Safety and Health Administration (OSHA) protections.

Components	Yes	No	NA	Remarks
Does the facility have a voluntary work program? If yes, do detainees participate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs staff maintains a written chart with work assignments and the corresponding classification levels.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Level 3 only allowed to clean their areas.
Detainee housekeeping meets neatness and cleanliness standards.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs, low level-three detainees have the opportunity to participate in special details, however, are never allowed to work outside the secure perimeter.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Written procedures govern selection of detainees for the Voluntary Work Program. <ul style="list-style-type: none"> • The same procedures apply for replacement workers as for "new" workers. • Staff follows written procedures. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Where possible, physically and mentally challenged detainees participate in the program.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility complies with work-hour requirements for detainees, not exceeding: <ul style="list-style-type: none"> • Eight hours a day. • Forty hours a week. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainee volunteers generally work according to fixed schedule.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs volunteers receive the \$1/day stipend.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs every participating detainee signed the Voluntary Work Program agreement?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
If a detainee is removed from a work detail, staff places the written justification for the action in the detainee's detention file.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff, in accordance with written procedure, ensures that detainee volunteers understand their responsibilities as workers before they join the work program.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Training officer not involved in this program.
The voluntary work program meets: <ul style="list-style-type: none"> • OSHA standards • NFPA standards • ACA standards • EOSH standards 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Medical staff screens and formally certifies detainee food service volunteers. <ul style="list-style-type: none"> • Before the assignment begins • As a matter of written procedure 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees receive safety equipment/ training sufficient for the assignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Does the OIC have the latest OSHA standards? NFPA? ACA? EOSH?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Proper procedure is followed when an alien is injured on the job.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Standard Rating:

Acceptable
 Deficient
 At-Risk
 Repeat Deficiency

***Remarks:** *(Record significant facts, observations, other sources used, etc.)*

The department heads are in charge of creating the training regimen for its voluntary workers. Management and the Training Officer are not involved in the review and approval process of this program. The standards state that the Training Officer and Management need to approve the training.

b6, b7C

b6, b7C

7/29/04

Auditor's Signature / Date

Department of Homeland Security
Immigration and Customs Enforcement
Office of Detention and Removal

Condition of Confinement Review Worksheet
(This document must be attached to each G-324a Inspection Form)
This Form to be used for Detention Reviews of SPCs

Headquarters Detention and Removal Operations



Health Services

Section II

HUNGER STRIKES

Policy: All facilities will follow standard guidelines for the medical and administrative management of INS detainees engaging in hunger strikes. By monitoring of the health and welfare of the individual detainees, facilities will strive to sustain their lives.

Components	Yes	No	NA	Remarks
When a detainee has refused food for 72 hours, it is standard practice for staff to refer him/her to the medical department.	X	<input type="checkbox"/>	<input type="checkbox"/>	
The OIC immediately reports a hunger strike to the DD. CDFs and IGSA's immediately report a hunger strike to the INS.	X	<input type="checkbox"/>	<input type="checkbox"/>	Notification made to FOD
The facility has established procedures to ensure staff respond immediately to a hunger strike.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Policy and procedure require that staff isolate a hunger-striking detainee from other detainees. • If yes, in an observation room?	X	<input type="checkbox"/>	<input type="checkbox"/>	
Medical personnel are authorized to place a detainee in the Special Management Unit or a locked hospital room.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Medical staff records the weight and vital signs of a hunger-striking detainee at least once every 24 hours.	x	<input type="checkbox"/>	<input type="checkbox"/>	
The OIC of the facility obtains a hunger striker's consent before medical treatment.	X	<input type="checkbox"/>	<input type="checkbox"/>	Consent obtained by medical staff
A signed Refusal of Treatment form is required of every detainee who rejects medical evaluation or treatment.	X	<input type="checkbox"/>	<input type="checkbox"/>	
During a hunger strike, staff documents and provides the hunger-striking detainee three meals a day.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Staff maintains the hunger striker's supply of drinking water/other beverages.	X	<input type="checkbox"/>	<input type="checkbox"/>	
During a hunger strike, staff removes all food items from the hunger striker's living area.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Staff is directed to record the hunger striker's fluid intake and food consumption, does staff always use Hunger Strike Monitoring Form I-839.	<input type="checkbox"/>	X	<input type="checkbox"/>	Monitoring form not found to be routinely in use, however, the content contained on the I-839 was found to be consistently recorded in the progress notes
The medical staff has written procedures for treating hunger strikers.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Staff documents all treatment attempts, including attempts to persuade hunger striker of medical risks.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Staff has received training in identification of hunger strikes. Medical staff receives early training in hunger-strike evaluation and treatment. Staff remains current in evaluation and treatment techniques.	X	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:			
SOURCE	TIME	DATE	LOCATION
Facility's written policy and procedures on detainee hunger strikes	15:30	27 July	Medical clinic
Detainee and staff interviews*	15:30	27 July	Medical clinic

Standard Rating:
 Acceptable Deficient Repeat Deficiency At-Risk

***Remarks:** (Record significant facts, observations, other sources used, etc.)

b6, b7C

b6, b7C /29 July 04
 Auditor's Signature / Date

ACCESS TO MEDICAL CARE

Policy: Every facility will establish and maintain an accredited/accreditation-worthy health program for the general well being of INS detainees.

Components	Yes	No	NA	Remarks
For INS SPCs and CDFs a Health Services Administrator (HSA) position exists and this administrator directs both the health care program and medical facilities. IGSAs facilities operate a health care facility in compliance with State and Local laws and guidelines.	X	<input type="checkbox"/>	<input type="checkbox"/>	
For INS SPCs and CDFs, the health program in compliance with NCCHC standards and the facility is currently accredited by NCCHC.	X	<input type="checkbox"/>	<input type="checkbox"/>	June 2003
The medical facility currently has JCAHO accreditation.	X	<input type="checkbox"/>	<input type="checkbox"/>	2003-2006
The facility's in-processing procedures of arriving detainees include medical screening.	X	<input type="checkbox"/>	<input type="checkbox"/>	
All detainees have access to and receive medical care.	X	<input type="checkbox"/>	<input type="checkbox"/>	
In INS SPCs and CDFs, the health program cost-effective.	X	<input type="checkbox"/>	<input type="checkbox"/>	Dental and mental health services on site
In INS SPCs and CDFs the facility has access to prearranged specialized health care and hospitalization arrangements in the local community. For IGSA's, the district has access to a Managed Health Care Coordinator.	X	<input type="checkbox"/>	<input type="checkbox"/>	2 local hospitals contracted for emergency care. List of specialized service providers update May 2004
The medical staff large enough to provide examine and treat the facility's detainee population.	X	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has sufficient space and equipment to afford each detainee privacy when receiving health care.	X	<input type="checkbox"/>	<input type="checkbox"/>	
The medical facility has its own restricted-access area. The restricted access area is located within the confines of the secure perimeter and no detainees have gained access in the past twelve months.	X	<input type="checkbox"/>	<input type="checkbox"/>	
The medical facility entrance includes a holding/waiting room.	X	<input type="checkbox"/>	<input type="checkbox"/>	
The medical facility's holding/waiting room under the direct supervision of custodial staff.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees in the holding/waiting room have access to a toilet and a drinking fountain.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Medical records are kept apart from other files. They are: <ul style="list-style-type: none"> • Secured in a locked area within the medical unit. • With physical access restricted to authorized medical staff. • Procedurally, no copies made and placed in detainee files. 	X	<input type="checkbox"/>	<input type="checkbox"/>	
Pharmaceuticals are stored in a secure area. In INS SPCs and CDFs they are stored in a manner consistent with all requirements of the INS standard.	X	<input type="checkbox"/>	<input type="checkbox"/>	All narcotics secured with double locks

ACCESS TO MEDICAL CARE

Policy: Every facility will establish and maintain an accredited/accreditation-worthy health program for the general well being of INS detainees.

<p>Medical screening includes a Tuberculosis (TB) test.</p> <ul style="list-style-type: none"> • Every arriving detainee receives a TB test. • During the admission process. • Detainee's TB-screening does not occur more than one business day after his/her arrival at the facility. • Detainees not screened are housed separate from the general population. 	x	<input type="checkbox"/>	<input type="checkbox"/>	
<p>All detainees receive a mental-health screening upon arrival. It is conducted:</p> <ul style="list-style-type: none"> • By a health care provider or specially trained officer; • Before a detainee's assignment to a housing unit. 	x	<input type="checkbox"/>	<input type="checkbox"/>	
<p><u>In INS SPCs and CDFs</u> the screener records all findings on the in-processing health screening form (I-794). In IGSA's the screening is recorded on an approved mental health screening form in an industry accepted format.</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	
<p>The facility health care provider promptly reviews all I-794s (or equivalent) to identify detainees needing medical attention.</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	
<p>The health care provider physically examines/assesses arriving detainees within 14 days of admission.</p>	x		<input type="checkbox"/>	25 charts reviewed; 1 found without 14 day PE. LOP states PE's to be recorded on I-795
<p>Detainees in the Special Management Unit have access to health care services.</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	Segregation rounds conducted daily
<p>Staff provides detainees with health- services request slips daily, upon request.</p> <ul style="list-style-type: none"> • Request slips are available in the languages other than English, including every language spoken by a sizeable number of the facility's detainee population. • Service-request slips are delivered in a timely fashion to the health care provider. 	x	<input type="checkbox"/>	<input type="checkbox"/>	Sick call slips provided in English and Spanish
<p><u>In SPCs and CDFs</u> sick call is scheduled in accordance with the guideline in paragraph VIII section E.</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	Sick call conducted 7 days weekly, exceeds standard
<p>The facility has a written plan for the delivery of 24-hour emergency health care when no medical personnel are on duty at the facility, or when immediate outside medical attention is required.</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	
<p>The plan includes an on-call provider.</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	
<p>The plan includes a list of telephone numbers for local ambulances and hospital services.</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	
<p>The plan includes procedures for facility staff to utilize this emergency health care consistent with security and safety.</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	
<p><u>In SPCs and CDFs</u> the health authority approved the contents, number, location, and procedures for monthly inspection of the first-aid kit(s).</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	
<p><u>In SPCs and CDFs</u> the health authority has developed written procedure for use of the first-aid kits by non-medical staff.</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	

ACCESS TO MEDICAL CARE

Policy: Every facility will establish and maintain an accredited/accreditation-worthy health program for the general well being of INS detainees.

Detention staff is trained to respond to health-related emergencies within a 4-minute response time.	X	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the training contains at least the five mandated elements in paragraph VIII section G?	X	<input type="checkbox"/>	<input type="checkbox"/>	
In INS SPCs and CDFs detention officers do not distribute medication to detainees.		X	<input type="checkbox"/>	Pill lines conducted in Clinic for general population. SMU meds delivered to SMU by clinic staff. Housing unit staff authorized to issue Tylenol within specified guidelines. Training provided on guidelines, CD concurs with training curriculum.
In IGSA's, if staff is used to distribute medication, a health care provider properly trains these officers.	<input type="checkbox"/>	<input type="checkbox"/>	x	
The medical unit keeps written records of medication that is distributed.	x	<input type="checkbox"/>	<input type="checkbox"/>	
The I-819 (or IGSA equivalent) is used to notify the OIC/Facility of a detainee that has special medical needs.	X	<input type="checkbox"/>	<input type="checkbox"/>	Noted via chart reviews
A signed and dated consent form is obtained from a detainee before medical treatment is administered.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees use the I-813 (or IGSA equivalent) to authorize the release of confidential medical records to outside sources.	X	<input type="checkbox"/>	<input type="checkbox"/>	
In INS SPCs and CDFs the written request from the detainee contains the six elements in paragraph VIII section K.	X	<input type="checkbox"/>	<input type="checkbox"/>	
A copy of this request is maintained in the detainee's A-file or facility detention file for IGSA's.	X	<input type="checkbox"/>	<input type="checkbox"/>	
The INS/CDF/IGSA assists the detainee in filling out this request and forwarding it to the health care provider.	X	<input type="checkbox"/>	<input type="checkbox"/>	
In INS SPCs and CDFs the OIC notified, in writing, by the medical staff when a detainee needs medical clearance prior to being transferred or released.	X	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs this notification will be forwarded from the HSA or Clinical Director of the medical facility on a Medical/Psychiatric Alert form (I-834).	X	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs when an alert has been received on a detainee, the detainee's Booking Record (I-385) is appropriately flagged to ensure appropriate consultation with medical staff before release or transfer.	X	<input type="checkbox"/>	<input type="checkbox"/>	
The facility health care/IGSA provider is given advance notice prior to the release, transfer, or removal of a detainee.	x	<input type="checkbox"/>	<input type="checkbox"/>	
Detainee's medical records or a copy thereof, are available and transferred with the detainee.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Medical records are placed in a sealed envelope or other container labeled with the detainee's name and A-number and marked "MEDICAL CONFIDENTIAL".	x	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs formal documented meetings are held at least quarterly between the OIC of the facility and the HSA of the medical facility.	X	<input type="checkbox"/>	<input type="checkbox"/>	Meetings conducted weekly

Verification Sources:			
SOURCE	TIME	DATE	LOCATION
Detainee handbook	10:20	28 July	Admin
Forms			
Sick-call logbook			
Facility's written policy and procedures	10:50	27 July	Medical Clinic
Inspecting medical area(s)	11:30	27 July	Medical Clinic
MOU(s) provisions			
Observing the detainee-intake process			
Quarterly-meeting minutes	11:15	27 July	Medical Clinic
Detainee and staff Interviews *	Multiple	27-29	SMU, Recreation yard, Barbershop

Standard Rating:
 Acceptable Deficient Repeat Deficiency At-Risk

Remarks: (Record significant facts, observations, other sources used, etc.)
 Pharmacy SIPS system has capability to print prescription labels in English as well as Spanish. Pharmacist is currently developing resources for providing medication instructions, in written form for detainees in every spoken language.

b6, b7C

 b6, b7C /29 July 04
 Auditor's Signature / Date

SUICIDE PREVENTION AND INTERVENTION

Policy: All detention staff working with INS detainees will be trained to recognize suicide-risk indicators. Staff will handle potentially suicidal individuals with sensitivity, supervision, and referrals. A clinically suicidal detainee will receive preventive supervision and treatment.

Components	Yes	No	NA	Remarks
Every new staff member receives suicide-prevention training.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Suicide-prevention training occurs during the employee orientation program.	X	<input type="checkbox"/>	<input type="checkbox"/>	Annual re-training conducted
Training prepares staff to: <ul style="list-style-type: none"> • Recognize potentially suicidal behavior; • Refer potentially suicidal detainees, following facility procedures; • Understand and apply suicide-prevention techniques. 	X	<input type="checkbox"/>	<input type="checkbox"/>	
A health-care provider or specially trained officer screens all detainees for suicide potential as part of the admission process? <ul style="list-style-type: none"> • Screening does not occur later than one working day after the detainee's arrival. 	X	<input type="checkbox"/>	<input type="checkbox"/>	
Written procedures cover when and how to refer at-risk detainees to medical staff and procedures are followed.	X	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has a designated isolation room for evaluation and treatment.	X	<input type="checkbox"/>	<input type="checkbox"/>	"rubber" room located within SMU
The designated isolation room does not contain any structures or smaller items that could be used in a suicide attempt.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Medical staff has approved the room for this purpose.	X	<input type="checkbox"/>	<input type="checkbox"/>	
Staff observes a suicide-watch detainee at least once every 15 minute.	X	<input type="checkbox"/>	<input type="checkbox"/>	15 min obs conducted in SSU, detainees requiring 1:1 obs are transferred to "rubber" room, placed in suicide gown.

Verification Sources:

SOURCE	TIME	DATE	LOCATION
Special Management Unit logbook		27 July	SMU
Inspection of Special Management Unit		27 July	SMU
Observation of detainee intake process.			
Facility's written policy and procedures	10:30	28 July	Admin
Detainee and staff interviews *	14:10	28 July	Medical clinic

Standard Rating:

X Acceptable Deficient Repeat Deficiency At-Risk

Remarks: (Record significant facts, observations, other sources used, etc.)

b6, b7C

b6, b7C

/29 July 04

Auditor's Signature / Date

TERMINAL ILLNESS, ADVANCED DIRECTIVES, AND DEATH

Policy: All facilities housing INS detainees shall have policies and procedures addressing the issues of terminal illness or injury, medical advanced directives, and detainee death, to include the procedures to ensure proper notification is provided to INS officials, family members and other interested parties in the event of a detainee becoming terminally ill or injured or death of a detainee occurs. In addition, the policy will cover procedures to be taken if the death of a detainee occurs while in transit.

Components	Yes	No	NA	Remarks
Detainees, who are chronically or terminally ill, are transferred to an appropriate offsite medical facility.	X	<input type="checkbox"/>	<input type="checkbox"/>	
The facility or appropriate INS office promptly notifies the next of kin of the detainee's: medical condition. <ul style="list-style-type: none"> • The detainee's location. • The limitations placed on visiting. 	X	<input type="checkbox"/>	<input type="checkbox"/>	
For SPCs and CDFs There are guidelines addressing State Advanced Directive Form for Implementing Living Wills and Advanced Directives. <ul style="list-style-type: none"> • The guidelines include instructions for detainees who wish to have a living will other than the generic form the DIHS provides or who wish to appoint another to make advance decisions for him or her. 	X	<input type="checkbox"/>	<input type="checkbox"/>	LOP's reviewed DNR noted to be completed and appropriately signed in detainee's native language. Multidisciplinary involvement including Medical, Mental Health and ICE noted.
The guidelines provide the detainee the opportunity to have a private attorney prepare the documents.	x	<input type="checkbox"/>	<input type="checkbox"/>	
There is a policy addressing "Do Not Resuscitate Orders."	x	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees with a "Do Not Resuscitate" order in the medical record receive maximal therapeutic efforts short of resuscitation?	X	<input type="checkbox"/>	<input type="checkbox"/>	Noted via chart review
The facility notifies the DIHS Medical Director and Headquarters' Legal Counsel of the name and basic circumstances of any detainee with a "Do Not Resuscitate" order in the medical record. In the case of IGSA's, this notification is made through the local INS representative.	x	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has written procedures to address the issues of organ donation by detainees. <ul style="list-style-type: none"> • INS SPCS and CDFs the procedures adhere to the detention standard requirements, if not, state the difference(s) 	X	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has written procedures to notify INS officials, deceased family members and consulates, when a detainee dies while in Service.	X	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has a policy and procedure to address the death of a detainee while in transport. <ul style="list-style-type: none"> • In SPCs and CDFs the procedures adhere to the requirements in the detention standard. 	X	<input type="checkbox"/>	<input type="checkbox"/>	

TERMINAL ILLNESS, ADVANCED DIRECTIVES, AND DEATH

Policy All facilities housing INS detainees shall have policies and procedures addressing the issues of terminal illness or injury, medical advanced directives, and detainee death, to include the procedures to ensure proper notification is provided to INS officials, family members and other interested parties in the event of a detainee becoming terminally ill or injured or death of a detainee occurs. In addition, the policy will cover procedures to be taken if the death of a detainee occurs while in transit.

Components	Yes	No	NA	Remarks
<p>At all INS locations the detainee's remains disposed of in accordance with the provisions detailed in this standard.</p> <ul style="list-style-type: none"> • The family has seven calendar days of the date of notification (in writing or in person) to claim the remains. • If the family chooses to claim the body, they are told that they will assume responsibility for making the necessary arrangements and paying all associated costs (transportation of body, burial, etc.). • If the family wants to claim the remains, but cannot afford the transportation costs, they are aware that INS may assist the family by transporting the remains to a location in the United States. • The consulate is notified. • When family members cannot be located or decline, orally or in writing, to claim the remains, the consulate is notified in writing. • The consulate is given seven calendar days to claim the remains. 	X	<input type="checkbox"/>	<input type="checkbox"/>	OIC verbalized proper procedures
<p>In the event that neither family nor consulate claims the remains, the DD schedules an indigent's burial, consistent with local procedures.</p> <ul style="list-style-type: none"> • If the detainee's is a U.S. military veteran is the Department of Veterans Affairs notified. 	X	<input type="checkbox"/>	<input type="checkbox"/>	
<p>An original or certified copy of a detainee's death certificate is placed in the subject's a-file.</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	
<p>The facility follows established policy and procedures describing when to contact the local coroner regarding such issues as</p> <ul style="list-style-type: none"> • Performance of an autopsy. • Who will perform the autopsy. • Obtaining State approved death certificates. • Local transportation of the body. 	x	<input type="checkbox"/>	<input type="checkbox"/>	
<p>INS staff follows established procedures to properly close the case of a deceased detainee.</p>	x	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:

SOURCE	TIME	DATE	LOCATION
Reviewing facilities medical policy	15:25	27 July	Medical clinic
Interviews with OIC, medical staff and district staff	10:20	28 July	OIC's office
Facility's written policy and procedures	14:00	27 July	Admin
Review of relevant post orders			

***Remarks:** (Record significant facts, observations, other sources used, etc.)

Standard Rating:

Acceptable Deficient Repeat Deficiency At-Risk

b6, b7C

b6, b7C

/29 July 04

Auditors Signature / Date

Department of Homeland Security
Immigration and Customs Enforcement
Office of Detention and Removal

Condition of Confinement Review Worksheet
(This document must be attached to each G-324a Inspection Form)
This Form to be used for Detention Reviews of SPCs

Headquarters Detention and Removal Operations



Security and Control

Section III

CONTRABAND

Policy: All detention facilities will ensure the proper handling and disposal of all contraband. Documentation of contraband destruction is required.

Components	Yes	No	NA	Remarks
The facility follows a written procedure for handling illegal contraband. Staff inventories, holds, and reports it when necessary to the proper authority for action/possible seizure.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Contraband that is government property is retained as evidence for potential disciplinary action or criminal prosecution.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff returns property not needed as evidence to the proper authority. Written procedures cover the return of such property.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Altered property is destroyed following documentation and using established procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Before confiscating religious items, the OIC or designated investigator contacts a religious authority.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff follows written procedures when destroying hard contraband that is illegal.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Hard contraband that is illegal (under criminal statutes) may be retained and used for official use, e.g. training purposes. If yes, under specific circumstances and using specified written procedures. Hard contraband is secured when not in use.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All identity documents (birth certificates, passports, etc.) are held in A-files. Detainees receive copies upon request. In SPCs and CDFs the detainee handbook (or equivalent) tells detainees that a copy of each identity document is available upon request.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Upon admittance, detainees receive notice of items they can and cannot possess.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
New arrivals receive copies of the rules regarding contraband.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees receive notification of contraband rules and procedures in the detainee handbook (or equivalent).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:			
SOURCE	TIME	DATE	LOCATION
Detainee Handbook	11:30	07/28	ECC Admin Trailer
Contraband Logbook	08:45	07/28	SIEA Offices
A-File/Detention file	09:00	07/28	ECC Intake Area (Detention Folders)
Review of facility policy and procedure for control and disposition of contraband	15:45	07/27	
Observation of contraband confiscation	08:45	07/28	From Logbooks only
Detainee and staff interviews	09:00	07/28	ECC Intake Area

Standard Rating: <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Deficient <input type="checkbox"/> Repeat Deficiency <input type="checkbox"/> At-Risk
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***Remarks:** (Record significant facts, observations, other sources used, etc.)

Two entries were taken from the Contraband Logbook in the SIEA offices, where the book is kept, and the detention files were later pulled for these two cases to verify appropriate forms and procedures. The detention files did, in fact, contain documentation that contraband was taken from the detainee at time of admission to ECC.

b6, b7C

7-29-04

Auditor's Signature / Date

DETENTION FILES

Policy: Every facility will create a detention file for every INS detainee booked into the facility, excluding only detainees scheduled to depart within 24 hours. The detention file will contain copies and, in some cases, the original of specified documents concerning the detainee's stay in the facility: classification sheet, medical questionnaire, property inventory sheet, disciplinary documents, etc.

Components	Yes	No	NA	Remarks
A detention file is created for every new arrival whose stay will exceed 24 hours. In SPCs and CDFs written procedures for in processing cover creation of the detention file.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The OIC or staff designate ensures that necessary equipment and supplies, including copier(s) and copier paper, are available; that all equipment is maintained in good working order, and that equipment has the capacity to handle the volume of work generated.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The detainee detention file contains either originals or copies of documentation and forms generated during the admissions process. In SPCs and CDFs, if necessary, copies of documents and forms contained are in the detainee's A-File.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The detainee's detention file also contains documents generated during the detainee's custody. <ul style="list-style-type: none"> • Special requests • Any G-589s and/or I-77s closed-out during the detainee's stay • Disciplinary forms/Segregation forms • Grievances, complaints, and the disposition(s) of same 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The Chief Detention Enforcement Officer (CDEO) or equivalent directs certain documents be added to an alien's detention file.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The detention files are located and maintained in a secured area. If not the cabinets are lockable and distribution of the keys is limited to supervisors.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	* See Remarks
The detention file remains active during the detainee's stay. When the detainee is released from the facility, staff adds copies of completed release documents, the original closed-out receipts for property and valuables, the original I-385 or equivalent and other documentation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The officer closing the detention file makes a notation that the file is complete and ready to be archived.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff makes copies and sends documents from the file when appropriately requested by supervisory personnel at the receiving facility or office.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs archived files are purged after three (3) years by shredding or burning.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Appropriate staff has access to the detention files and other departmental requests are accommodated by making a request for the file. Each file is properly logged out and in by a representative of the responsible department.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

DETENTION FILES

Policy: Every facility will create a detention file for every INS detainee booked into the facility, excluding only detainees scheduled to depart within 24 hours. The detention file will contain copies and, in some cases, the original of specified documents concerning the detainee's stay in the facility: classification sheet, medical questionnaire, property inventory sheet, disciplinary documents, etc.

Components	Yes	No	NA	Remarks
Field offices controlling detention in IGSA facilities create and maintain detention files on all detainees admitted to IGSA facilities. These files contain the forms and documents set forth for SPC/CDF detention files to the extent that the field office creates them or the IGSA forwards them.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not an IGSA Facility.

Verification Sources:

SOURCE	TIME	DATE	LOCATION
Review of facility policy and procedures.	08:00	07/28	ECC Admin Trailer
Observation of in processing procedures	15:15	07/28	ECC Intake Area
Review of detention files	09:00	07/28	ECC Intake Area (Detention Files)

Standard Rating:

Acceptable
 Deficient
 Repeat Deficiency
 At-Risk

***Remarks:** (Record significant facts, observations, other sources used, etc.)

The detention files are not located in a secure area. They are kept in lockable steele file cabinets near the SDEO office in the processing area. These cabinets were unlocked when this reviewer arrived as one of the officers was actively working with the files. Upon completion of his task this reviewer witnessed the officer locking the file cabinets. He was asked how many officers in intake have keys to these file cabinets. The officer stated he was the only one.

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7-29-04

Auditor's Signature / Date

DISCIPLINARY POLICY

Policy: All facilities housing INS detainees are authorized to impose discipline on detainees whose behavior is not in compliance with facility rules and regulations.

Components	Yes	No	NA	Remarks
The facility has a written disciplinary system using progressive levels of reviews and appeals.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility rules state that disciplinary action shall not be capricious or retaliatory.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Written rules prohibit staff from imposing or permitting the following sanctions: <ul style="list-style-type: none"> • corporal punishment • deviations from normal food service • clothing deprivation • bedding deprivation • denial of personal hygiene items • loss of correspondence privileges • deprivation of physical exercise 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The rules of conduct, sanctions, and procedures for violations are defined in writing and communicated to all detainees verbally and in writing.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The following conspicuously posted in Spanish and English or other dominate languages used in the facility: <ul style="list-style-type: none"> • Rights and Responsibilities • Prohibited Acts • Disciplinary Severity Scale • Sanctions • If so, where posted 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
When minor rule violations or prohibited acts occur, informal resolutions are encouraged.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
If informal resolutions are not appropriate, incident reports and Notice of Charges are promptly forwarded to the INS/CDF supervisor.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Incident reports are investigated within 24 hours of the incident report. The Unit Disciplinary Committee (UDC) or equivalent does not convene before investigations have ended.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
An intermediate disciplinary process is used to adjudicate minor infractions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A disciplinary panel (or equivalent in IGSA's) adjudicates infractions. The panel: <ul style="list-style-type: none"> • Conducts hearings on all charges and allegations referred by the UDC • Considers written reports, statements, physical evidence, and oral testimony • Hears pleadings by detainee and staff representative • Bases its findings on the preponderance of evidence • Imposes only authorized sanctions 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A staff representative is available, if requested for a detainee facing a disciplinary hearing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility permits hearing postponements or continuances when conditions warrant such a continuance. Reasons for are documented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

DISCIPLINARY POLICY

Policy: All facilities housing INS detainees are authorized to impose discipline on detainees whose behavior is not in compliance with facility rules and regulations.

Components	Yes	No	NA	Remarks
The duration of punishment set by the OIC/recommended by the disciplinary panel does not exceed established sanctions. The maximum time in disciplinary segregation does not exceed 60 days for a single offense.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Written procedures govern the handling of confidential-informant information. Standards include criteria for recognizing "substantial evidence"	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All forms relevant to the incident, investigation, committee/panel reports, etc., are completed and distributed as required.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:

SOURCE	TIME	DATE	LOCATION
Observing posted notices of rights	10:00	07/27	ECC - Kilo Barracks
Observing disciplinary hearings			Not Available
Review of written disciplinary actions	09:45	07/28	ECC Intake (Detention Files)
Facility's written policy and procedures	08:00	07/28	ECC Admin Trailer
Detainee and staff interviews *	15:00	07/27	ECC SMU

Standard Rating:

Acceptable
 Deficient
 Repeat Deficiency
 At-Risk

***Remarks:** (Record significant facts, observations, other sources used, etc.)

There was only one individual currently in the SMU (admin seg) awaiting a disciplinary hearing for misconduct. Contract guards in the SMU were not able to tell this reviewer when that hearing was going to be.

b6, b7C

7-29-04

Auditors Signature / Date

EMERGENCY (CONTINGENCY) PLANS

Policy All facilities holding INS detainees will respond to emergencies with a predetermined standardized plan to minimize the harming of human life and the destruction of property. It is recommended that SPCs and CDFs enter into agreement, via Memorandum of Understanding (MOU), with federal, local and state agencies to assist in times of emergency.

Components	Yes	No	NA	Remarks
No Detainee or detainee groups exercise control or authority over other detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees are protected from: <ul style="list-style-type: none"> • Personal abuse • Corporal punishment • Personal injury • Disease • Property damage • Harassment from other detainees 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff are trained to identify signs of detainee unrest. <ul style="list-style-type: none"> • What type of training and how often? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Annual Crisis Training
Does staff effectively disseminates information on facility climate, detainee attitudes, and moods to the Officer In Charge (OIC)? <ul style="list-style-type: none"> • From the OIC to line staff? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
There is a designated person or persons responsible for emergency plans and their implementation. Sufficient time is allotted to the person or group for development and implementation of the plans.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detention Operations Supervisor b6, b7C
The plans address the following issues: <ul style="list-style-type: none"> • Confidentiality • Accountability (copies and storage locations) • Annual review procedures and schedule • Revisions 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Contingency plans include a comprehensive general section with procedures applicable to most emergency situations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has cooperative contingency plans with applicable: <ul style="list-style-type: none"> • Local law enforcement agencies • State agencies • Federal agencies 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See Remarks
All staff receives copies of Hostage Situation Management policy and procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff is trained to disregard instructions from hostages, regardless of rank. Within 24 hours after release hostages are screened for medical and psychological effects. In SPCs and CDFs, the OIC has a plan that includes the use of a victim assistance team for released hostages and hostage families.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs a review team visits the facility after every hostage taking.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Emergency plans include emergency medical treatment for staff and detainees during and after an incident.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The food service maintain at least 3-days' worth of emergency meals for staff and detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Written plans locate shut-off valves and switches for all utilities (water, gas, electric).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs emergency plans describe alternative routes to the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Section C, No. 16 of the ECC Em.Cont. book

EMERGENCY (CONTINGENCY) PLANS

Policy All facilities holding INS detainees will respond to emergencies with a predetermined standardized plan to minimize the harming of human life and the destruction of property. It is recommended that SPCs and CDFs enter into agreement, via Memorandum of Understanding (MOU), with federal, local and state agencies to assist in times of emergency.

Components	Yes	No	NA	Remarks
In SPCs and CDFs emergency procedures include notification of neighbors.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Lists with numbers right under title page.
In SPCs and CDFs Do plans specify procedures for post-emergency debriefings and discussion?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs the OIC periodically schedule emergency "drills" to test the facility's emergency preparedness (readiness to implement contingency plan(s)) The plans reviewed annually.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Emergency drill log was reviewed in the SIEA building
Written procedures cover: <ul style="list-style-type: none"> • Work/Food Strike • Disturbances • Escapes • Bomb Threats • Adverse Weather • Internal Searches • Facility Evacuation • Detainee Transportation System Plan • Internal Hostages • Civil Disturbances 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:

SOURCE	TIME	DATE	LOCATION
Facility's written policy and procedures	15:00	07/28	ECC Admin Trailer
Reviewing facility records	08:45	07/28	ECC SIEA building
Detainee and staff interviews	14:00	07/28	ECC OIC Office

Standard Rating:

Acceptable
 Deficient
 Repeat Deficiency
 At-Risk

Remarks: (Record significant facts, observations, other sources used, etc.)

The Emergency Contingency Plans book was very nicely organized and provided phone numbers to be called in case of emergency. The phone numbers were easily accessible even in a frantic state of mind during an emergency.

b6, b7C

7-29-04

Auditors Signature / Date

ENVIRONMENTAL HEALTH AND SAFETY

Policy: Every facility will control flammable, toxic, and caustic materials through a hazardous materials program. The program will include, among other things, the identification and labeling of hazardous materials in accordance with applicable standards (e.g., National Fire Protection Association [NFPA]); identification of incompatible materials, and safe-handling procedures

Components	Yes	No	NA	Remarks
The facility has a system for storing, issuing, and maintaining inventories of hazardous materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Constant inventories are maintained for all flammable, toxic, and caustic substances used/stored in each section of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The manufacturer's Material Safety Data Sheet (MSDS) file is up-to-date for every hazardous substance used. <ul style="list-style-type: none"> • The files list all storage areas, and include a plant diagram and legend. • The MSDSs and other information in the files are available to personnel managing the facility's safety program. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All personnel using flammable, toxic, and/or caustic substances follow the prescribed procedures. They: <ul style="list-style-type: none"> • Wear personal protective • Equipment. • Report hazards and spills to the • designated official. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The MSDSs are readily accessible to staff and detainees in the work areas.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MSDS's were not located at all chemical locations
Hazardous materials are always issued under proper supervision. <ul style="list-style-type: none"> • quantities are limited. • Staff always supervises detainees using these substances. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
"Flammable" and "combustible" materials (liquid and aerosol) are stored and used according to label recommendations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Lighting fixtures and electrical equipment are installed in storage rooms and other hazardous areas meet National Electrical Code requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the storage rooms meet the security and structural requirements specified in the standard. Storage cabinets meet the physical requirements specified in the standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All toxic and caustic materials stored in their original containers in a secure area.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Sev cases of dry bleach was stored unsec in laund
Excess flammables, combustibles, and toxic liquids are disposed of properly and in accordance with MSDSs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Imp Valley Environment PO done as needed.
Staff directly supervises and accounts for products with methyl alcohol. Staff receives a list of products containing diluted methyl alcohol, e.g., shoe dye. All such products clearly labeled as such. "Accountability" includes issuing such products to detainees in the smallest workable quantities.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No methyl alcohol products are used in ECC.
Every employee and detainee using flammable, toxic, or caustic materials receives advance training in their use, storage, and disposal.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

ENVIRONMENTAL HEALTH AND SAFETY

Policy: Every facility will control flammable, toxic, and caustic materials through a hazardous materials program. The program will include, among other things, the identification and labeling of hazardous materials in accordance with applicable standards (e.g., National Fire Protection Association [NFPA]); identification of incompatible materials, and safe-handling procedures

Components	Yes	No	NA	Remarks
The facility complies with the most current edition of applicable codes, standards, and regulations of the National Fire Protection Association and the Occupational Safety and Health Administration (OSHA).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A technically qualified officer conducts the fire and safety inspections. In SPCs and CDFs, these inspections are conducted informally on a weekly basis and formally monthly. Every written inspection report forwarded to the OIC.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The Safety Office (or officer) maintains files of inspection reports? Including corrective actions taken.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has an approved fire prevention, control, and evacuation plan.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The plan requires: <ul style="list-style-type: none"> • Monthly fire inspections. • Fire protection equipment strategically located throughout the facility. • Public posting of emergency plan with accessible building/room floor plans. • Exit signs and directional arrows. • An area-specific exit diagram conspicuously posted in the diagrammed area. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Fire extinguishers are throughout facility but are under padlock. Every key ring has keys to these locks.
Fire drills are conducted and documented monthly.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1 per shift per quarter
A sanitation program covers barbering operations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The barbershop has the facilities and equipment necessary to meet sanitation requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The sanitation standards are conspicuously posted in the barbershop.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Written procedures regulate the handling and disposal of used needles and other sharp objects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	In medical unit.
All items representing potential safety or security risks are inventoried and a designated individual checks this inventory weekly.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs, the Health Services Administrator (HSA) has implemented a program supporting a high level of environmental sanitation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The delegated health & safety to one of her staff officers
In SPCs and CDFs the HSA conducts medical-facility inspections every day. Each inspection includes noting the condition of floors, walls, windows, horizontal surfaces, and equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Standard cleaning practices include: <ul style="list-style-type: none"> • Using specified equipment; cleansers; disinfectants and detergents. • An established schedule of cleaning and follow-up inspections. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The kitchen could use some closer attention but over all the facility is well kept and very clean.
The facility follows standard cleaning procedures. <ul style="list-style-type: none"> • For SPCs and CDFs list discrepancies between INS standard and facility procedures and isolation-cleaning procedures been implemented as required. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Spill kits are readily available.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See remarks

ENVIRONMENTAL HEALTH AND SAFETY

Policy: Every facility will control flammable, toxic, and caustic materials through a hazardous materials program. The program will include, among other things, the identification and labeling of hazardous materials in accordance with applicable standards (e.g., National Fire Protection Association [NFPA]); identification of incompatible materials, and safe-handling procedures

Components	Yes	No	NA	Remarks
A licensed medical waste contractor disposes of infectious/bio-hazardous waste.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs staff is trained to prevent contact with blood and other body fluids and written procedures are followed.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See remarks
Do the methods for handling/disposing of refuse meet all regulatory requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Only 1 licensed service provider in El Centro.
A licensed/Certified/Trained pest-control professional inspects for rodents, insects, and vermin. <ul style="list-style-type: none"> • At least monthly. • The pest-control program includes preventive spraying for indigenous insects. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Completed 07/09/04, 06/26/04, 05/08/04, 03/26/04. . . .
Drinking water and wastewater is routinely tested according to a fixed schedule.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Annually
Emergency power generators are tested at least every two weeks. <ul style="list-style-type: none"> • Other emergency systems and equipment receive testing at least quarterly. • Testing is followed-up with timely corrective actions (repairs and replacements). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator is approximately two years old and is very clean. Very well maintained!

Verification Sources:

SOURCE	TIME	DATE	LOCATION
Observe maintenance crews			Limited but throughout inspection.
Observe detainee work crews			Limited but throughout inspection.
Inspect storage facilities	10:30	07/29/04	ECC Rec & Laundry Buildings
Facility's written policy and procedures	11:00	07/29/04	ECC Maintenance Building
Inspect inspection reports	11:00	07/29/04	ECC Maintenance Building
Inspect medical facilities	11:30	07/29/04	ECC Medical Unit Dumpsters
Review waste removal contracts	11:35	07/29/04	ECC Admin Trailer
Review evacuation routes/maps	11:15	07/29/04	ECC Maintenance Building
Detainee and staff interviews *	10:30	07/29/04	ECC Laundry

Standard Rating:

Acceptable
 Deficient
 Repeat Deficiency
 At-Risk

***Remarks:** (Record significant facts, observations, other sources used, etc.)

There were not spill kits readily available at many of the posts within ECC. The Facility Manager was in attendance during the review and he was in contact with his staff at each occasion ordering them to provide spill kits to the location/post in question. Spill kits were provided but most officers questioned were unable to explain how to use them. Only 3 of 10 staff member questions could explain how to use a spill kit.

b6, b7C

7-29-04

Auditors Signature / Date

HOLD ROOMS IN DETENTION FACILITIES

Policy: Hold rooms will be used only for temporary detention for detainees awaiting removal, transfer, EOIR hearings, medical treatment, intra-facility movement, or other processing into or out of the facility.

Components	Yes	No	NA	Remarks
The hold room is situated in a location within the secure perimeter.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the single occupant hold rooms contain a minimum of 37 square feet (7 unencumbered square feet for the detainee, 5 square feet for a combination lavatory/toilet fixture, and 25 square feet for a wheelchair turn-around area). <ul style="list-style-type: none"> • If multiple-occupant hold rooms are used, there is an additional 7 unencumbered square feet for each additional detainee. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Although there are three small rooms originally used for detainees, these rooms are no longer used. They have been converted into clothing issue, temporary property storage.
The hold rooms well ventilated, well-lighted and all activating switches located outside the room.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The hold rooms contain sufficient seating for the number of detainees held.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
No bunks/cots/beds or other related make shift sleeping apparatuses are permitted inside holdrooms.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs constructed after 1998 the hold rooms are equipped with stainless steel combination lavatory/toilet fixtures with modesty panels. They are: <ul style="list-style-type: none"> • Compliant with the American Disabilities Act. • Small hold rooms (1 to 14 detainees) have at least one combi-unit. • Large hold rooms (15 to 49 detainees) are provided with at least two combi-units. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Very minor observation: Hold Room A has a sign on the door that states capacity of 15 but that room only has 1 toilet.
In SPCs and CDFs constructed after 1998 the hold room have floor drain(s).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Two of these rooms do not have drains.
The walls of the hold rooms escape proof. <ul style="list-style-type: none"> • The hold room ceilings are escape and tamper resistant. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs constructed after 1998 the door to the hold room swings outward the door complies with the specifications outlined in the standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Individuals are not held in hold rooms for more than 12 hours.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See Remarks
In SPCs, CDFs are family units, persons of advanced age (over 70), females with children, and unaccompanied juvenile detainees (under the age of 18) placed in hold rooms?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Neither females nor juveniles are housed at ECC.
Male and females are segregated from each other at all times.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No females are housed at ECC.
Every effort is made to ensure that detained detainees under the age of 18 are not held with adult detainees.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No juveniles are housed at ECC.
Detainees are provided with basic personal hygiene items such as water, soap, toilet paper, cups for water, feminine hygiene items, diapers and wipes.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In older facilities officers are within visual or audible range to allow detainees access to toilet facilities on a regular basis.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs Officers inspect all property, including parcels, suitcases, bags, bundles, boxes, before accepting the property.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Property is not inventoried until later in processing, after detainee is accepted

HOLD ROOMS IN DETENTION FACILITIES

Policy: Hold rooms will be used only for temporary detention for detainees awaiting removal, transfer, EOIR hearings, medical treatment, intra-facility movement, or other processing into or out of the facility.

Components	Yes	No	NA	Remarks
All detainees are given a putdown search for weapons or contraband before being placed in the room.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
For SPCs and CDFs, each detention facility maintains a detention log (manually or by computer) for each detainee placed in a hold cell. <ul style="list-style-type: none"> • The log includes the required information specified in the standard. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs officers provide a meal to any detainee detained more than six hours. <ul style="list-style-type: none"> • Juveniles, babies and pregnant women have access to snacks, milk or juice? . • Meal are served to juveniles regardless of time in custody 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Meals are provided to the hold rooms during meal times, otherwise a bag lunch is available upon request during after hours.
Officers closely supervise the detention hold rooms using direct supervision (Irregular visual monitoring.). <ul style="list-style-type: none"> • Hold rooms are irregularly monitored every 15 minutes. • Unusual behavior or complaints are noted. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All four hold rooms are in direct visual contact of processing staff.
In SPCs and CDFs policy prevents an officer to enter an occupied detention hold room unless another officer is stationed outside the door.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
When the last detainee has been removed from the hold room, it is given a thorough inspection. <ul style="list-style-type: none"> • Cleaning. • Evidence of tampering with doors, locks, windows, grills, plumbing or electrical fixtures is reported to the shift supervisor for corrective action or repair. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Staff states that the areas are cleaned by workers once emptied but failed to specifically mention a security inspection after cleaning.
There is a written evacuation plan? <ul style="list-style-type: none"> • There is a designated officer to remove detainees from the holdrooms in case of fire and/or building evacuation. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
An appropriate emergency service is called immediately upon a determination that a medical emergency may exist.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:			
SOURCE	TIME	DATE	LOCATION
Hold room logbook review	14:30	07/27	ECC Admin Trailer
Observation of hold rooms	14:00	07/27	ECC Intake - Hold Rooms
Review of facility policy and procedure for control and disposition of contraband	15:45	07/27	ECC Admin Trailer
Detainee and staff interviews	14:00	07/27	ECC Intake

Standard Rating: <input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient <input checked="" type="checkbox"/> Repeat Deficiency <input type="checkbox"/> At-Risk
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***Remarks:** (Record significant facts, observations, other sources used, etc.)

Staff in the processing area state they do not have any memory of anybody spending more than 12 hours in the hold rooms in the past two years; however, Hold Room logs show some detainees spending up to 17 hours in the holding area. Hold Room logs document that this is not typical but it is happening on small but regular occasions. It should be noted that some detainees spent as little as 17 minutes in the processing area.

This reviewer would not otherwise find this standard particularly deficient; however, this was an issue on the past review and should be continued to be improved upon. Log sheets do document that most of the detainees spent less than 12 hours in holding. Although under 12 hours is acceptable, logs show that detainees are frequently kept in holding for 8 to 12 hours before being transferred to Bravo West to await medical clearance to go to the general population barracks.

It appears that progress has been made in this area since last review but logs reflect that the violations continue on a less frequent basis.

b6, b7C

7-29-04

Auditor's Signature / Date

**KEY AND LOCK CONTROL
(SECURITY, ACCOUNTABILITY AND MAINTENANCE)**

Policy It is the policy of the INS Service to maintain an efficient system for the use, accountability and maintenance of all keys and locks.

Components	Yes	No	NA	Remarks
In SPCs and CDFs each facility has the position of Security Officer. If not <ul style="list-style-type: none"> A staff member appointed the collateral duties of security officer. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b6, b7C is the primary Security Officer
In SPCs and CDFs the security officer has a written position description.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The security officer[s], or equivalent in IGSA's, has attended an approved locksmith-training program.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Locksmithing only is through maintenance.
The security officer, or equivalent in IGSA's, has responsibly for all administrative duties and responsibilities relating to keys, locks etc.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The security officer, or equivalent in IGSA's, provides training to employees in key control.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The security officer, or equivalent in IGSA's, maintains inventories of all keys, locks and locking devices.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The security officer follows a preventive maintenance program and maintains all preventive maintenance documentation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Twice Annually
Facility policies and procedures address the issue of compromised keys and locks.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The security officer, or equivalent in IGSA's, develops policy and procedures to ensure safe combinations integrity.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Only dead bolt or dead lock functions are used in detainee accessible areas.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See Remarks.
Non-authorized locks (as specified in the Detention Standard) are not used in detainee accessible areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility does not use grand master keying systems.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All worn or discarded keys and locks cut up and properly disposed of .	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Padlocks and/or chains are not used on cell doors.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The entrance/exit door locks to detainee living quarters, or areas with an occupant load of 50 or more people, conform to <ul style="list-style-type: none"> Occupational Safety and Environmental Health Manual, Chapter 3 National Fire Protection Association Life Safety Code 101. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The operational keyboard sufficient to accommodate all the facility key rings including keys in use is located in a secure area.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs/CDFs, is the key cabinet constructed so keys will not be visible except during issue.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A wall was built to hide keys from public view.
Procedures in place to ensure that key rings are: <ul style="list-style-type: none"> Identifiable Numbers of keys on the ring are cited? Keys cannot be removed from issued key rings 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All key rings ckecks had chits indicating the number of keys on the ring.
Emergency keys are available for all areas of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b2High

**KEY AND LOCK CONTROL
(SECURITY, ACCOUNTABILITY AND MAINTENANCE)**

Policy It is the policy of the INS Service to maintain an efficient system for the use, accountability and maintenance of all keys and locks.

Components	Yes	No	NA	Remarks
The facilities use a key accountability system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Authorization is necessary to issue any restricted key.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Individual gun lockers are provided. <ul style="list-style-type: none"> • They are located in an area that permits constant officer observation. • In an area that does not allow detainee or public access. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has a key accountability policy and procedures to ensure key accountability. The keys are physically counted daily.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Counted each shift at Control Alpha
In SPCs and CDFs the designated key control officer the only employee who is authorized to add or remove a key from a ring.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	and must provide auth. to locksmith in written form.
In SPCs and CDFs the splitting of key rings into separate rings is authorized in writing and documented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All staff members are trained and held responsible for adhering to proper procedures for the handling of keys. <ul style="list-style-type: none"> • Issued keys are returned immediately in the event an employee inadvertently carries a key ring home. • When a key or key ring is lost, misplaced, or not accounted for, the shift supervisor is immediately notified. • Detainees are not permitted to handle keys assigned to staff. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:

SOURCE	TIME	DATE	LOCATION
A. Observing key distribution	13:15	07/29/04	ECC Control Alpha
B. Observing Officer behavior	13:00	07/29/04	ECC Control Alpha
A. Inspection of Lockshop	12:00	07/29/04	ECC Maintenance Building
B. Facility's written policy and procedures.	13:30	07/29/04	ECC Admin Trailer
C. Detainee and staff interviews *	13:00	07/29/04	ECC Control Alpha

Standard Rating:

Acceptable **Deficient** **Repeat Deficiency** **At-Risk**

***Remarks:** (Record significant facts, observations, other sources used, etc.)

There are no padlocks or chains on doors or gates that are used for egress or control of detainees but there are numerous padlocks within the perimeter on utility cages and fire extinguishers.

b6, b7C

7-29-04

Auditors Signature / Date

POPULATION COUNTS

Policy: All detention facilities shall ensure around-the-clock accountability for all detainees. This requires that they conduct at least one formal count of the detainee population per shift, with additional formal and informal counts conducted as necessary.

Components	Yes	No	NA	Remarks
Staff conducts a formal count at least once each shift.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	6am,3pm,9pm,& 2am
Activities cease or are strictly controlled while a formal count is being conducted.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Do certain operations continue during formal counts?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No transfers/movement
Is a certain amount of movement tolerated during a formal count?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	No transfers/movement but workers may be out.
Formal counts in all units take place simultaneously.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs at least two officers participate in the count in each area/unit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs count procedures include sending a count slip to the control officer after each count.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs both officers conducting the count prepare and sign the count slip in indelible ink.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Officers do not allow detainee participation in the count.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs every area/unit conducts a recount whenever an incorrect count is reported.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A face-to-photo count follows each unsuccessful recount.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Unless missing detainee is already identified.
In SPCs and CDFs the two officers conducting the area/unit count switch positions for the recount.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Officers positively identify each detainee before counting him/her as present.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Only after unsuccessful counts.
Written procedures cover informal and emergency counts. <ul style="list-style-type: none"> • They followed during informal counts. • During emergencies. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The control officer (or other designated position) maintains an out-count record of all detainees temporarily leaving the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Located in Processing Unit for detainees outside of ECC.
In SPCs and CDFs the facility train all officers to follow all requirements of INS' "Population Count Detention Standard".	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
This training is documented in each officer's training folder.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:			
Source	Time	Date	Location
Observation of facility counts	15:30	07/28	ECC Alpha North
Observation of escort procedures (whether out counts are maintained)	15:30	07/28	ECC Alpha North
Facility log books	15:45	07/28	ECC Alpha North
Written policy and procedures	16:00	07/28	ECC Admin Trailer
Detainee and staff interviews*	15:45	07/28	ECC Alpha North

Standard Rating: <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Deficient <input type="checkbox"/> Repeat Deficiency <input type="checkbox"/> At-Risk
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***Remarks:** (Record significant facts, observations, other sources used, etc.)

Staff state that there is no transfers to/from barracks during counts until all detainees are accounted for. They state that it is typically 10 minutes from the beginning of count before they are notified to continue regular operations.

An inaccurate count was not witnessed.

b6, b7C 7-29-04
 Auditor's Signature / Date

POST ORDERS

Policy: INS provides officers all necessary guidance for carrying out their duties. This guidance includes the post orders established for every post, which are reviewed at least annually, and given to each officer upon assignment to that post.

Components	Yes	No	NA	Remarks
Every Fixed post has a set of post orders.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Each set contains the latest inserts (emergency memoranda, etc.) and revisions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
One individual or department is responsible for keeping all post-orders current with revisions that take place between reviews.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the CDEO's office or contract equivalent maintains a complete set (central file) of post orders.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the central file accessible to all staff.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The OIC or Contract / IGSA equivalent initiate/authorizes all post-order changes.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The OIC or Contract / IGSA equivalent has signed and dated the last page of every section.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cover memo in each P.O. folder.
In SPCs and CDFs, the post orders contain the required six sections.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Nicely kept and recently updated.
A review/updating/reissuing of post orders occurs regularly. At a minimum, Annually. <ul style="list-style-type: none"> In SPCs and CDFs the facility follows written post-order review procedures. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the OIC or Contract equivalent initiates the annual review by soliciting suggestions from affected staff. <ul style="list-style-type: none"> Staff has sufficient notice to prepare and submit written suggestions by the due date 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	CIEA writes and reviews P.O.'s then forwards them to the OIC for approval.
In SPCs and CDFs the OIC or contract equivalent retains all written suggestions, whether accepted or rejected, in a historical file. <ul style="list-style-type: none"> The records are retained for two years. The historical file includes comments, if any, from the reviewing official(s). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Historical files include HQ memos and suggestions from staff but are not kept together in one file. Could be in one of two places.
Procedures keep post orders and logbooks secure from detainees at all times.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs emergency changes to post orders are made by memorandum.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs the post orders for armed posts provide instructions for: <ul style="list-style-type: none"> Recognizing conditions when use of weapons is authorized. The care and safe handling of firearms. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	b2High
Every armed-post officer qualifies with the post weapon(s) before assuming post duty.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	b2High
In SPCs armed-post post orders clearly state that if an official is taken hostage, he/she loses all authority normally associated with his/her position, regardless of rank or seniority.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	b2High
Armed-post post orders provide instructions for escape attempts.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	b2High
The post orders for housing units track the event schedule.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

POST ORDERS

Policy: INS provides officers all necessary guidance for carrying out their duties. This guidance includes the post orders established for every post, which are reviewed at least annually, and given to each officer upon assignment to that post.

Components	Yes	No	NA	Remarks
Housing-unit post officers record all detainee activity in a log. The post order includes instructions on maintaining the logbook.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the SDEO/contract supervisor visits each housing area and reviews the logbooks at least once per shift.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:

SOURCE	TIME	DATE	LOCATION
Post orders in use at posts	10:00	07/27	ECC Barracks & SMU
Master copy of post orders	10:30	07/28	ECC Admin Trailer
Documentation of firearms qualifications			Not Available
Housing unit logbooks	10:00	07/27	ECC Barracks
Facility policy & procedures for post orders	10:30	07/28	ECC Admin Trailer
History file for each set of post orders	10:30	07/28	ECC Admin Trailer
Staff Interview(s) *	15:30	07/27	ECC SMU

Standard Rating:

Acceptable
 Deficient
 Repeat Deficiency
 At-Risk

***Remarks:** (Record significant facts, observations, other sources used, etc.)

b6, b7C

7-29-04

Auditor's Signature / Date

SECURITY INSPECTIONS

Policy: Post assignments in the facility's high-risk areas, where special security procedures must be followed, will be restricted to experienced personnel with a thorough grounding in facility operations.

Components	Yes	No	NA	Remarks
The facility has a comprehensive security inspection policy. The policy specifies: <ul style="list-style-type: none"> • Posts to be inspected • Required inspection forms • Frequency of inspections • Guidelines for checking security features • Procedures for reporting weak spots, inconsistencies, and other areas needing improvement 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Every officer is required to conduct a security check of his/her assigned area. The results are documented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Results are not doc'd unless something wrong.
Documentation of security inspections is kept on file.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs an officer been assigned responsibility for ensuring the security inspection process covers all areas of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	b6, b7C Sec. Officer
Procedures ensure that recurring problems and a failure to take corrective action are reported to the appropriate manager.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the front entrance has a sallyport-type entrance, with interlocking electronic doors or grilles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The front-entrance officer checks the ID of everyone entering or exiting the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This was def. last review - completely rectified.
All visits officially recorded in a visitor logbook or electronically recorded.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the Control Center maintain employee Personal Data Cards (Form G-74 or contract equivalent).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Control Alpha has for ICE, PHS, & Contractors
The facility has a secure visitor pass system.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Every Control Center officer receives specialized training.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The Control Center is staffed around the clock.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Policy restricts staff access to the Control Center.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees do not have access to the Control Center.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Communications are centralized in the Control Center.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the recall list includes the current home telephone number of each employee. Phone numbers are updated as needed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	On computer—Only contract supervisors have access.
In SPCs and CDFs staff makes watch calls every half-hour between 6 PM and 6 AM.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	hourly, not every half hour
Officers monitor all vehicular traffic entering and leaving the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See Remarks
The facility maintains a log of all incoming and departing vehicles to sensitive areas of the facility. Each entry contains: <ul style="list-style-type: none"> • The driver's name • Company represented • Vehicle contents • Delivery date and time • Date and time out • Vehicle license number • Name of employee responsible for the vehicle during the facility visit 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See Remarks

SECURITY INSPECTIONS

Policy: Post assignments in the facility's high-risk areas, where special security procedures must be followed, will be restricted to experienced personnel with a thorough grounding in facility operations.

Components	Yes	No	NA	Remarks
Officers thoroughly search each vehicle entering and leaving the facility.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See Remarks
The facility has a written policy and procedures to prevent the introduction of contraband into the facility or any of its components.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Tools being taken into the secure area of the facility are inventoried before entering and prior to departure.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The SMU entrance has a sallyport.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Written procedures govern searches of detainee housing units and personal areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Housing area searches occur at irregular times.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Every search of the SMU and other housing units documented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Storage and supply rooms; walls, light and plumbing fixtures, accesses, and drains, etc. undergo frequent, irregular searches. These searches are documented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Walls, fences, and exits, including exterior windows, are inspected for defects once each shift.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Each shift by contract supervisors
Daily procedures include: <ul style="list-style-type: none"> • Perimeter alarm system tests. • Physical checks of the perimeter fence. • Documenting the results. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the maintenance supervisor and CDEO/ Chief of Security make monthly fence checks.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Visitation areas receive frequent, irregular inspections.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:			
SOURCE	TIME	DATE	LOCATION
Observing inspection procedures			Not Available
Observing procedures at front entrance	15:30	07/29/04	Front Entrance
Reviewing logbooks	16:00	07/29/04	ECC Contract Project Manager
Facility's written policy and procedures	15:15	07/29/04	ECC Admin Trailer
Detainee and staff interviews	15:30	07/29/04	Throughout ECC Facility

Standard Rating: <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Deficient <input type="checkbox"/> Repeat Deficiency <input type="checkbox"/> At-Risk
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***Remarks:** (Record significant facts, observations, other sources used, etc.)

Facility deliveries are during first shift only. Swing shift and night shift document all vehicle entries into the salleyport area at Control Alpha (logs confirmed). These entries are presumably transport vehicles only and are directly related to transportation of detainees.

Deliveries during first shift are documented at Gate 1 of the salley port by security staff stationed at that gate. Logs for day shift are kept at that location and are appropriate. There are

b2High



b2 high

b6, b7C

7-29-04

Auditors Signature / Date

**SPECIAL MANAGEMENT UNIT (SMU)
Administrative Segregation**

Policy: The Special Management Unit required in every facility isolates certain detainees from the general population. The Special Management Unit will consist of two sections. One, Administrative Segregation, houses detainees isolated for their own protection; the other for detainees being disciplined for wrongdoing (see the "Special Management Unit [Disciplinary Segregation]" standard).

Components	Yes	No	NA	Remarks
The Administrative Segregation unit provides non-punitive protection from the general population and individuals undergoing disciplinary segregation. <ul style="list-style-type: none"> • Detainees are placed in the SMU (administrative) in accordance with written criteria. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In exigent circumstances, staff may place a detainee in the SMU (administrative) before a written order has been approved. <ul style="list-style-type: none"> • A copy of the order given to the detainee within 24 hours. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The OIC (or equivalent) regularly reviews the status of detainees in administrative detention? <ul style="list-style-type: none"> • A supervisory officer conducts a review within 72 hours of the detainee's placement in the SMU (administrative). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A supervisory officer conducts another review after the detainee has spent seven days in administrative segregation. <ul style="list-style-type: none"> • Every week thereafter for the first month. • Every 30 days after the first month. • Does each review include an interview with the detainee. • Is a written record made of the decision and the justification. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The detainee is given a copy of the decision and justification for each review. <ul style="list-style-type: none"> • If not, why not? • The detainee is given an opportunity to appeal the reviewer's decision to someone else in the facility. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The OIC (or equivalent) routinely notifies the Assistant District Director (or staff officer in charge of IGSA's), Detention and Deportation (ADDD), any time a detainee's stay in administrative detention exceeds 30 days. <ul style="list-style-type: none"> • Upon notification that the detainee's administrative segregation has exceeded 60 days, the ADDD forwards written notice to the Assistant Regional Director for DRO. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The OIC (or equivalent) reviews the case of every detainee who objects to administrative segregation after 30 days in the SMU. <ul style="list-style-type: none"> • A written record is made of the decision and the justification. • The detainee receives a copy of this record. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**SPECIAL MANAGEMENT UNIT (SMU)
Administrative Segregation**

Policy: The Special Management Unit required in every facility isolates certain detainees from the general population. The Special Management Unit will consist of two sections. One, Administrative Segregation, houses detainees isolated for their own protection; the other for detainees being disciplined for wrongdoing (see the "Special Management Unit [Disciplinary Segregation]" standard).

Components	Yes	No	NA	Remarks
The detainee is given the right to appeal to the OIC (or equivalent) the conclusions and recommendations of any review conducted after the detainee has remained in administrative segregation for seven consecutive days.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Administratively segregated detainees enjoy the same general privileges as detainees in the general population.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The SMU well ventilated. <ul style="list-style-type: none"> • Adequately lighted. • Appropriately heated. • Maintained in a sanitary condition. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All cells are equipped with beds. <ul style="list-style-type: none"> • Every bed securely fastened to the floor or wall. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The number of detainees in any cell does not exceed the occupancy limit. <ul style="list-style-type: none"> • Does the OIC approve excess occupancy on a case-by-case basis? • When occupancy exceeds recommended capacity, do basic living standards decline? • Do criteria for objectively assessing living standards exist? • If yes, are the criteria included in the written procedures? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff states that they have double bunked in the SMU but it is very rare.
The segregated detainees do not have fewer opportunities to exchange/laundry clothing, bedding, and linen than detainees in the general population.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees receive three nutritious meals per day. <ul style="list-style-type: none"> • From the general population's menu of the day. • Do detainees eat only with disposable utensils. • Is food ever used as punishment. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Each detainee maintains a normal level of personal hygiene in the SMU. <ul style="list-style-type: none"> • The detainees have the opportunity to shower and shave at least three times a week. • If not, explain. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff state that due to heat & humidity they offer detainees a chance to shower daily.
The detainees are provided: <ul style="list-style-type: none"> • Barbering services. • Recreation privileges in accordance with the "Detainee Recreation" standard. • Non-legal reading material. • Religious material. • The same correspondence privileges as detainees in the general population. • Telephone access similar to that of the general population. • Personal legal material. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**SPECIAL MANAGEMENT UNIT (SMU)
Administrative Segregation**

Policy: The Special Management Unit required in every facility isolates certain detainees from the general population. The Special Management Unit will consist of two sections. One, Administrative Segregation, houses detainees isolated for their own protection; the other for detainees being disciplined for wrongdoing (see the "Special Management Unit [Disciplinary Segregation]" standard).

Components	Yes	No	NA	Remarks
A health care professional visits every detainee at least three times a week. <ul style="list-style-type: none"> • The shift supervisor visits each detainee daily. • Weekends and holidays. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Medical staff visits daily. Logs are available in the SMU.
Procedures comply with the "Visitation" standard. <ul style="list-style-type: none"> • The detainee retains visiting privileges. • The visiting room available during normal visiting hours. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Visits from clergy are allowed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees do not have less law-library access than the general population. <ul style="list-style-type: none"> • Are they required to use the law library separately, as a group? If so: • Legal materials brought to them. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The SMU maintains a permanent log. <ul style="list-style-type: none"> • Detainee-related activity, e.g., meals served, recreation, visitors etc. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
SPC procedures include completing the SMU Housing Record (I-888) immediately upon a detainee's placement in the SMU. <ul style="list-style-type: none"> • Staff completes the form at the end of each shift. • CDFs and IGSA facilities use Form I-888 (or local equivalent). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Does staff record whether the detainee ate, showered, exercised and took any medication during every shift? <ul style="list-style-type: none"> • Does the log record all pertinent information, e.g., a medical condition, suicidal/assaultive behavior, etc.? • Does the medical officer/health care professional sign each individual's record during each visit? • Does the housing officer initial the record when all detainee services are completed or at the end of the shift? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A new record is created for each week the detainee is in Administrative Segregation. <ul style="list-style-type: none"> • These weekly records are retained in the SMU until the detainee's return to the general population. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:			
SOURCE	TIME	DATE	LOCATION
SMU Observation	15:30	07/27	ECC SMU
SMU logs	15:30	07/27	ECC SMU
Review of the facility's Administrative Segregation policy and procedures	11:00	07/27	ECC Admin Trailer
Detainee and staff interviews	15:00	07/27	ECC SMU
*Other			

Standard Rating: <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Deficient <input type="checkbox"/> Repeat Deficiency <input type="checkbox"/> At-Risk
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***Remarks:** (Record significant facts, observations, other sources used, etc.)

Contract detention staff were interviewed. They state that they prefer to treat detainees in the SMU (admin or disciplinary) with respect as it begets respect. Three detainees were interviewed enroute to the law library from the SMU and they all stated that the SMU staff are excellent about getting them their programming (law library, rec, etc).

b6, b7C

7-29-04

Auditor's Signature / Date

**SPECIAL MANAGEMENT UNIT
(Disciplinary Segregation)**

Policy: Each facility will establish a Special Management Unit in which to isolate certain detainees from the general population. The Special Management Unit will have two sections, one for detainees in Administrative Segregation; the other for detainees being segregated for disciplinary reasons.

Components	Yes	No	NA	Remarks
Officers placing detainees in disciplinary segregation follow written procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The sanctions for violations committed during one incident do not exceed 60 days.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A completed Disciplinary Segregation Order accompanies the detainee into the SMU? <ul style="list-style-type: none"> • The detainee receives a copy of the order within 24 hours of placement in disciplinary segregation. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Standard procedures include reviewing the cases of individual detainees housed in disciplinary detention at set intervals. <ul style="list-style-type: none"> • Who conducts the review? • What is reviewed? • How is the review documented? • Does the reviewer interview the detainee? • Can the reviewing officer recommend an early release from the SMU? • If yes, under what circumstances? • After each formal review, does the detainee receive a written copy of the decision and reason(s) for it? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	What is reviewed? 1) Abides by all rules and regulations and 2) provided showers, meals, rec, and other basic living standards. The SDEO may authorize early release from the SMU if it is no longer necessary to control behavior.
The conditions of confinement in the SMU are proportional to the amount of control necessary to protect detainees and staff.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees in disciplinary segregation have fewer privileges than those housed in administrative segregation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Per policy.
Living conditions in disciplinary SMUs modified to reinforce acceptable behavior. <ul style="list-style-type: none"> • If yes, does staff prepare written documentation for this action. • Does the OIC sign to indicate approval. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Living conditions (heat, a/c, lighting, meals, etc) are not altered/modified in any way.
Every detainee in disciplinary segregation receives the same humane treatment, regardless of offense.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The quarters used for segregation are: <ul style="list-style-type: none"> • Well-ventilated. • Adequately lighted. • Appropriately heated. • Maintained in a sanitary condition. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All cells are equipped with beds. <ul style="list-style-type: none"> • The beds securely fastened to the floor or wall of the cell. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**SPECIAL MANAGEMENT UNIT
(Disciplinary Segregation)**

Policy: Each facility will establish a Special Management Unit in which to isolate certain detainees from the general population. The Special Management Unit will have two sections, one for detainees in Administrative Segregation; the other for detainees being segregated for disciplinary reasons.

Components	Yes	No	NA	Remarks
The number of detainees confined to each cell or room does not exceed the number for which the space was designate. <ul style="list-style-type: none"> Does the OIC approve excess occupancy on a temporary basis. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The OIC may authorize if other living conditions may be maintained; however, at time of review the SMU was not full.
Is a dry cell part of the disciplinary SMU?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	See remarks
When a detainee is segregated without clothing, mattress, blanket, or pillow, a justification is made and the decision is reviewed each shift. Items are returned as soon as it is safe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees in the SMU have the same opportunities to exchange clothing, bedding, etc., as other detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees in the SMU receive three nutritious meals/days. <ul style="list-style-type: none"> Selected from the Food Service's menu of the day. Food is not used as punishment. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees are allowed to maintain a normal level of personal hygiene, including the opportunity to shower and shave at least three times/week.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Showers are offered daily.
The detainees receive, unless documented as a threat to security: <ul style="list-style-type: none"> Barbering services. Recreation privileges. Other-than-legal reading material. Religious material. The same correspondence privileges as other detainees. Personal legal material. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
When phone access is limited by number or type of calls, limits do not apply to the following: <ul style="list-style-type: none"> Calls about the detainee's immigration case or other legal matters. Calls to consular/embassy officials. Calls during family emergencies (as determined by the OIC/Warden). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A health care professional visits every detainee in disciplinary segregation every day, Monday through Friday. <ul style="list-style-type: none"> The shift supervisor visit each segregated detainee daily Weekends and holidays. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Logs are available in the SMU and in the medical unit documenting the visits.
SMU detainees are allowed visitors, in accordance with the "Visitation" standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
SMU detainees receive legal visits, as provided in the "Visitation" standard. <ul style="list-style-type: none"> Legal service providers notified of security concerns arising before a visit. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**SPECIAL MANAGEMENT UNIT
(Disciplinary Segregation)**

Policy: Each facility will establish a Special Management Unit in which to isolate certain detainees from the general population. The Special Management Unit will have two sections, one for detainees in Administrative Segregation; the other for detainees being segregated for disciplinary reasons.

Components	Yes	No	NA	Remarks
Visits from clergy are allowed. <ul style="list-style-type: none"> • The clergy member given the option of visiting/not visiting the segregated detainee. • Violent/uncooperative detainees denied access to religious services when safety and security would otherwise be affected. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
SMU detainees have law library access. <ul style="list-style-type: none"> • Violent/uncooperative detainees retain access to the law library unless adjudicated a security threat in writing. • Legal material brought to individuals in the SMU on a case-by-case basic. • Staff documents every incident of denied access to the law library. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All detainee-related activities are documented, e.g., meals served, recreation activities, visitors, etc.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is the <u>SPC's</u> , the Special Management Housing Unit Record (I-888) is prepared as soon as the detainee is placed in the SMU. <ul style="list-style-type: none"> • All I-888s filled out by the end of each shift • The CDF/IGSA facility use Form • I-888 (or equivalent local form). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
SMU staff records whether the detainee ate, showered, exercised, took medication, etc. <ul style="list-style-type: none"> • Details about the detainee logged, e.g., a medical condition, suicidal/violent behavior, etc. • The health care official sign individual records after each visit. • The housing officer initials the record when all detainee services are completed or at the end of the shift. • A new record is created weekly for each detainee in the SMU. • The SMU retains these records until the detainee leaves the SMU. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:			
SOURCE	TIME	DATE	LOCATION
Detainee Detention Files	09:30	07/28	ECC Intake - Detention Files
SMU Logs	15:00	07/27	ECC SMU
Facility Policy and Procedures	11:00	07/27	ECC Admin Trailer
Detainee and staff interviews	15:00	07/27	ECC SMU
Observations of SMU	15:30	07/27	ECC SMU

Standard Rating: <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Deficient <input type="checkbox"/> Repeat Deficiency <input type="checkbox"/> At-Risk
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***Remarks:** (Record significant facts, observations, other sources used, etc.)

There is a dry cell with rubber walls located within the SMU building but, per policy, it is considered a part of the medical unit. Detainees are not housed in that room without medical authorization. Staff was unaware of the policy stating it was part of the medical unit but they did confirm that anybody that goes into that room comes from the medical unit.

b6, b7C

7-27-04

Auditor's Signature / Date

TOOL CONTROL

Policy: It is the policy of all facilities that all employees shall be responsible for complying with the tool control policy. The Maintenance Supervisor shall maintain a computer generated or typewritten Master Inventory list of tools and equipment and the location in which tools are stored. These inventories shall be current, filed and readily available for tool inventory and accountability during an audit.

Components	Yes	No	NA	Remarks
There is an individual who is responsible for developing a tool control procedure and an inspection system to insure accountability.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Department heads are responsible for implementing this standard in their departments.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Tool inventories are required for: <ul style="list-style-type: none"> • Maintenance Department • Medial Department • Food Service Department • Electronics Shop • Recreation Department • Armory 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has a facility policy for the regular inventory of all tools. <ul style="list-style-type: none"> • The policy sets minimum time lines for physical inventory and all necessary documentation. • INS facilities use AMIS bar code labels when required. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs, the tool inventories are conducted as specified in the detention standard.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has a tool classification system. <u>In SPCs and CDFs</u> tools classified according to: <ul style="list-style-type: none"> • Restricted (dangerous/hazardous) • Non Restricted (non-hazardous). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All tools are classified as restricted. None are considered Non-Restricted.
Department heads are responsible for implementing tool-control procedures. <u>In SPCs and CDFs</u> they are required to: <ul style="list-style-type: none"> • Prepare a computer-generated inventory of all class "R" tools. • Post a copy of the class "R" tool inventory with the equipment, in a prominent position. • Post a copy of the class "R" tool inventory with the equipment, in a prominent position. • Submit a second copy of the inventory to the CDEO. • Repeat the class "R" tool inventory on a regular schedule (at least weekly, monthly, or quarterly), as follows: <ul style="list-style-type: none"> • Food service department-weekly • Maintenance department medical facility-monthly • Electronics work area, recreation area(s), and armory-quarterly. • Send a copy of inventory report to the OIC. • Report missing tools in accordance with procedures in the standard. (see section III.H., below). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

TOOL CONTROL

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Components	Yes	No	NA	Remarks
The facility has policies and procedures in place to ensure that all tools are marked and readily identifiable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has an approved tool storage system. <ul style="list-style-type: none"> • The system ensures that all stored tools are accountable. • Commonly used tools (tools that can be mounted) are stored in such a way that missing tool are readily notice. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility uses a red outlined shape of tool and a chit system to identify tools' locations.
Each facility has procedures for the issuance of tools to staff and detainees. <u>In SPCs and CDFs:</u> <ul style="list-style-type: none"> • Restricted tools are issued only to the individual who will be using it. • Detainees are not permitted to use non-restricted tools except under supervision. • A metal or plastic chit receipt used to sign out tools. • The OIC has established site-specific procedures for the control of ladders, extension cords, and ropes. • The CDEO or contract equivalent approves the issuance of tools to a specified project for extended periods. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has policies and procedures to address the issue of lost tools. The policy and procedures include: <ul style="list-style-type: none"> • Verbal and written notification. • Procedures for detainee access. • Necessary documentation/review for all incidents of lost tools. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Broken or worn out tools are surveyed and disposed of in an appropriate and secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recycled with service provider as needed.
All private or contract repairs and maintenance workers under contract to the INS, or other visitors, submit an inventory of all tools prior to admittance into or departure from the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	


Verification Sources:

SOURCE	TIME	DATE	LOCATION
Tool inventories	12:15	07/29	ECC Maintenance Building (Tool Rm)
Review of facility policy and procedure	11:45	07/29	ECC Admin Trailer
Housing unit log books	15:00	07/28	ECC Alpha North
Observation of tool issuance	12:00	07/29	ECC Maintenance Building (Tool Rm)
Detainee and staff interviews *	11:45	07/29	ECC Admin Trailer

Standard Rating:

Acceptable Deficient Repeat Deficiency At-Risk

***Remarks:** (Record significant facts, observations, other sources used, etc.)

 7-29-04
Auditor's Signature / Date

**TRANSPORTATION
(Land Transportation)**

Policy The Immigration and Naturalization Service will take all necessary precautions to protect the lives, safety, and welfare of our officers, the general public, and those in INS custody during the transportation of detainees. Standards have been established for professional transportation under the supervision of experienced and trained Detention Enforcement Officers or authorized contract personnel.

Components	Yes	No	NA	Remarks
Transporting officers comply with applicable local, state, and federal motor vehicle laws and regulations. Records support this finding of compliance.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Every transporting officer required to drive a commercial size bus has a valid Commercial Driver's License (CDL) issued by the state of employment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supervisors maintain records for each vehicle operator.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	In the SIEA Bldg.
Officers use a checklist during every vehicle inspection. <ul style="list-style-type: none"> • Officers report deficiencies affecting operability. • Deficiencies are corrected before the vehicle goes back into service. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Transporting officers: <ul style="list-style-type: none"> • Limit driving time to 10 hours in any 15-hour period. • Drive only after eight consecutive off-duty hours. • Do not receive transportation assignments after having been on duty, in any capacity, for 15 hours. • Drive a 50-hour maximum in a given work week; a 70-hour maximum during eight consecutive days. • During emergency conditions (including bad weather), officers may drive as long as necessary and safe to reach a safe area—exceeding the 10-hour limit. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All per ECC SOP's
Two officers with valid CDLs required in any bus transporting detainees. <ul style="list-style-type: none"> • When buses travel in tandem with detainees, there two qualified officers per vehicle. • An unaccompanied driver transports an empty vehicle. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Before the start of each detail, the vehicle is thoroughly searched.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Positive identification of all detainees being transported is confirmed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All detainees are searched immediately prior to boarding the vehicle by staff controlling the bus or vehicle.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility ensures that the number of detainees transported does not exceed the vehicles manufacturers occupancy level.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Long range busses are always available if they can't fit into van.
Protective vests are provided to all transporting officers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The vehicle crew conducts a visual count once all passengers are on board and seated. <ul style="list-style-type: none"> • Additional visual counts are made whenever the vehicle makes a scheduled or unscheduled stop. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Per IEA staff--not actually witnessed.
Policies and procedures are in place addressing the use of restraining equipment on transportation vehicles.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**TRANSPORTATION
(Land Transportation)**

Policy The Immigration and Naturalization Service will take all necessary precautions to protect the lives, safety, and welfare of our officers, the general public, and those in INS custody during the transportation of detainees. Standards have been established for professional transportation under the supervision of experienced and trained Detention Enforcement Officers or authorized contract personnel.

Components	Yes	No	NA	Remarks
Officers ensure that no one contacts the detainees. <ul style="list-style-type: none"> One officer remains in the vehicle at all times when detainees are present. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Meals are provided during long distance transfers. <ul style="list-style-type: none"> The meals meet the minimum dietary standards, as identified by dieticians utilized by the Service. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Box lunches & water provided for trips over 4 hours.
The vehicle crew inspects all Food Service pickups before accepting delivery (food wrapping, portions, quality, quantity, thermos-transport containers, etc.). <ul style="list-style-type: none"> Before accepting the meals, the vehicle crew raises and resolves questions, concerns, or discrepancies with the Food Service representative. Basins, latrines, and drinking-water containers/dispensers are cleaned and sanitized on a fixed schedule. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
INS Vehicles have: <ul style="list-style-type: none"> Two-way radios. Cellular telephones. Equipment boxes stocked in accordance with the Use of Force Standard. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No equipment boxes in vans. Flares were in vans but there were no blankets.
The vehicles are clean and sanitary at all times.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Personal property of a detainee transferring to another facility: <ul style="list-style-type: none"> Is inventoried. Is inspected. Accompanies the detainee. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	& recorded on the I-216
The following contingencies are included in the written procedures for vehicle crews: <ul style="list-style-type: none"> Attack Escape Hostage-taking Detainee sickness Detainee death Vehicle fire Riot Traffic accident Mechanical problems Natural disasters Severe weather Passenger list is not exclusively men or women or minors 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	per policy women & children to ride in another vehicle if trip is >6 hours & they are to sit in the front of the vehicle.

Verification Sources:			
SOURCE	TIME	DATE	LOCATION
Observing transportation activities	09:00	07/29	ECC Processing (Detention Vans)
Traveling with vehicle crew			Not Available
Observing search procedures	09:15	07/29	ECC Salley Port
Observing restraining procedures			Not Available
Facility's written policy and procedures	15:00	07/28	ECC Admin Trailer
Detainee and staff interviews*	08:30	07/29	ECC Processing

Standard Rating: <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Deficient <input type="checkbox"/> Repeat Deficiency <input type="checkbox"/> At-Risk
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***Remarks:** (Record significant facts, observations, other sources used, etc.)

Staff states that detainees could be in leg irons or handcuffed to each other. The transporting officer would decide at what level of security to operate.

b6, b7C 7-29-04
 Auditor's Signature / Date

USE OF FORCE

Policy: The U.S. Immigration & Naturalization Service authorizes the use of force only as a last alternative after all other reasonable efforts to resolve a situation have failed. Only that amount of force necessary to gain control of the detainee, to protect and ensure the safety of detainees, staff and others, to prevent serious property damage and to ensure institution security and good order may be used. Physical restraints necessary to gain control of a detainee who appears to be dangerous may be employed when the detainee:

Components	Yes	No	NA	Remarks
Written policy authorizes staff to respond in an immediate-use-of-force situation without a supervisor's presence or direction.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
When the detainee is in an area that is or can be isolated (e.g., a locked cell, a range), posing no direct threat to the detainee or others, officers must try to resolve the situation without resorting to force.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Written policy asserts that calculated rather than immediate use of force is feasible in most cases.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility subscribes to the prescribed Confrontation Avoidance Procedures. <ul style="list-style-type: none"> • Ranking detention official, health professional, and others confer before every calculated use of force. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
When a detainee must be forcibly moved and/or restrained and there is time for a calculated use of force, staff uses the Use-of-Force Team Technique. <ul style="list-style-type: none"> • Under staff supervision. • In SPCs and CDFs a Physician's Assistant is present prior to and during the Use-of-Force Team Technique to observe and immediately treat any injuries. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff members are trained in the performance of the Use-of-Force Team Technique.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All use-of-force incidents are documented and reviewed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>In SPCs and CDFs</u> the calculated-use-of-force video sequentially presents the following: <ul style="list-style-type: none"> • Team Leader's introduction • Face of each team member (without helmet), identified by name and title • Team Leader offering detainee a last chance to comply, and explaining the use-of-force results of noncompliance • Unedited coverage of the operation, from the use-of-force order to the end • Medical staff examining the detainee in restraints, with close-ups recording the presence or absence of injuries on the detainee's body • Staff injuries, with oral description(s) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Policy is appropriate but staff and the OIC state that no significant incidents have been video'd for several years. Unable to confirm the SOP is being followed as there is no incidents to compare to.
All videotapes of use-of-force incidents catalogued and preserved for at least 2-1/2 years after last documented use. <ul style="list-style-type: none"> • The videotapes available for incident review. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	OIC states that he had some video from several years ago but sent it out to warehouse storage.

USE OF FORCE

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Components	Yes	No	NA	Remarks
Staff: <ul style="list-style-type: none"> • Does not use force as punishment. • Attempts to gain the detainee's voluntary cooperation before resorting to force • Uses only as much force as necessary to control the detainee. • Uses restraints only when other non-confrontational means, including verbal persuasion, have failed or are impractical. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Medication may only be used for restraint purposes when authorized by the Medical Authority as medically necessary.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
SPCs and CDFs use INS-authorized restraint equipment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Use-of-Force Team follow written procedures that attempt to prevent injury and exposure to communicable disease(s).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs the OIC contacts higher command before restraining a detainee beyond eight hours.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	See remarks.
Standard procedures associated with using four-point restraints include: <ul style="list-style-type: none"> • Soft restraints (e.g., vinyl) • Dressing the detainee appropriately for the temperature. • A bed, mattress, and blanket/sheet. • Checking the detainee at least every 15 minutes. • Logging each check. • Turning the bed-restrained detainee often enough to prevent soreness or stiffness. • Medical evaluation of the restrained detainee twice per eight-hour shift. • When qualified medical staff is not immediately available, staff positions the detainee "face-up". 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Policy & SOP exist for the use of soft restraints but staff states that they are not used in ECC anymore. Staff could not identify where such equipment was even located in the facility. Policy was appropriate but apparently not applicable as ECC no longer used this type of restraint.
The shift supervisor monitors the detainee's position/condition every two hours. <ul style="list-style-type: none"> • He/she allows the detainee to use the rest room at these times under safeguards. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All detainee checks are logged.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In immediate-use-of-force situations, staff contacts medical staff once the detainee is under control.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
When the OIC authorizes use of non-lethal weapons: <ul style="list-style-type: none"> • Medical staff is consulted before staff use pepper spray/non-lethal weapons. • Medical staff reviews the detainee's medical file before use of a non-lethal weapon is authorized. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No spray is used in the facility. IEA's carry collapsible steel batons & do not require medical review prior to use.

USE OF FORCE

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Components	Yes	No	NA	Remarks
Special precautions are taken when restraining pregnant detainees. <ul style="list-style-type: none"> • Medical personnel are consulted 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No females at ECC.
Protective gear is worn when restraining detainees with open cuts or wounds.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff documents every use of force and/or non-routine application of restraints.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
It standard practice to review any use of force and the non-routine application of restraints.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs and CDFs After-Action Review Teams review the videotape for the following: <ul style="list-style-type: none"> • Professionalism • Use of Force Team's protective gear • Appropriate/excessive use of force • Proper application of restraints • Time needed to restrain the detainee • Removal of protective gear before entering the cell or area • Prompt medical examination of the detainee after the move • Proper use of chemical agents or pepper mace • Opportunity for detainee to submit voluntarily to the placing of restraints before the team enters the cell • Derogatory, demeaning, taunting, or other inappropriate language between team members and the detainee, or between team members and individuals outside the cell or area 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Policy is appropriate but staff and the OIC state that no significant incidents have been video'd for several years. Unable to confirm the SOP is being followed as there is no incidents to compare to.
In SPCs and CDFs the After-Action Review Report is completed within two working days of the detainee's release from restraints.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
If the reviewers decide the matter requires further investigation, the Office of Internal Affairs, the Office of the Inspector General, and/or the FBI are notified.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All officers receive training in self-defense, confrontation-avoidance techniques and the use of force to control detainees. <ul style="list-style-type: none"> • Specialized training is given Officers are certified in all devices they use. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The officers are thoroughly trained in the use of soft and hard restraints.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs is the Use of Force form is used. <ul style="list-style-type: none"> • In other facilities this form or its equivalent is used. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Verification Sources:			
SOURCE	TIME	DATE	LOCATION
Facility policy and procedure for Use of Force	11:30	07/28	ECC Admin Trailer
Use of Force log and forms	11:30	07/28	Unable to locate Use of Force log.
Observation of Use of Force (actual or simulated)			Not Available
Detainee and staff interviews	11:30	07/28	ECC Admin Trailer

Standard Rating: <input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Deficient <input type="checkbox"/> Repeat Deficiency <input type="checkbox"/> At-Risk
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***Remarks:** (Record significant facts, observations, other sources used, etc.)

If behavior cannot be controlled after 8 hours of being restrained then the OIC would seek assistance from the medical unit to seek placement in another more appropriate facility.

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7-29-04

Auditor's Signature / Date

STAFF DETAINEE COMMUNICATIONS

Policy: Procedures must be in place to allow for formal and informal contact between key facility staff and ICE staff and ICE detainee and to permit detainees to make written requests to ICE staff and receive an answer in an acceptable time frame.

Components	Yes	No	NA	Remarks
The ICE Field Office Director ensures that weekly announced and unannounced visits occur at the IGSA.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detention and Deportation Staff conduct scheduled weekly visits with detainees held in the IGSA.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DO's witnessed speaking to detainees on 07/27/04.
Scheduled visits are posted in ICE detainee areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Visiting staff observe and note current climate and conditions of confinement at each IGSA.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICE information request Forms are available at the IGSA for use by ICE detainees.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not an IGSA facility.
The IGSA treats detainee correspondence to ICE staff as Special Correspondence.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICE staff respond to a detainee request from an IGSA within 72 hours.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not an IGSA facility.
ICE detainees are notified in writing upon admission to the facility of their right to correspond with ICE staff regarding their case or conditions of confinement.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Standard is explained on orientation video but is not provided in writing.

Staff Detainee Communications - Rating

When rated below Acceptable, facilities must attach a Plan of Action for bringing operations into compliance. For each element found out of compliance, the plan of action will specify remedial action and the estimated timetable for compliance.

Standard Rating:

Acceptable **Deficient** **At-Risk** **Repeat Finding**

***Remarks:** (Record significant facts, observations, other sources used, etc.)

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Auditor's Signature / Date