



U.S. Immigration  
and Customs  
Enforcement

MEMORANDUM FOR: Robin F. Baker  
Field Office Director  
San Diego Field Office

FROM: James T. Hayes, Jr.  
Director

SUBJECT: El Centro Service Processing Center Annual Review

The annual review of the El Centro Service Processing Center conducted on June 17-19, 2008, in El Centro, California, has been received. The Review Authority (RA) has downgraded the rating to an **Acceptable**.

The CC-324A worksheets provided by the Reviewer-in-Charge (RIC) indicated the facility was non-compliant with the Environmental Health and Safety, Key and Lock Control, and Food Service standards. A Plan of Action is required to address these deficiencies.

The rating was based on the RIC Summary Memorandum and supporting documentation. The Field Office Director must remedy the deficient standards, and initiate the following actions in accordance with the Detention Management Control Program (DMCP):

- 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 CC-324A, *Detention Facility Review Form*, the CC-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 RA within 30 days.
- 3) The RA will advise the Field Office Director once the Plan of Action is approved.
- 4) Once a Plan of Action is approved, the Field Office Director shall schedule a follow-up on the above noted deficiencies within 90 days.

Subject: El Centro Special Processing Center Annual Review

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The Field Office is responsible for assisting the Intergovernmental Service Agreement (IGSA) facility to respond to the U.S. Immigration and Customs Enforcement findings when assistance is requested. Notification to the facility shall include information that this assistance is available.

Should your staff have any questions regarding this matter, please contact Deputy Assistant Director, Detention Management Division at (202) 732-

b6, b7c

b2 high

cc:

b2 high, (b)(6), (b)(7)c

# MANAGEMENT REVIEW

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## REVIEW AUTHORITY

THE SIGNATURE BELOW CONSTITUTES REVIEW AND ACCEPTANCE OF THIS REPORT BY THE REVIEW AUTHORITY. **FOD/OIC/CEO WILL HAVE THIRTY (30) CALENDAR DAYS FROM RECEIPT OF THIS REPORT TO RESPOND TO ALL FINDINGS AND RECOMMENDATIONS.**

|  |           |
|--|-----------|
| HQDRO MANAGEMENT REVIEW: (Print Name)<br>James T. Hayes, Jr. | Signature |
| Title<br>Director  | Date      |

- FINAL RATING:**
- SUPERIOR
  - GOOD
  - ACCEPTABLE
  - DEFICIENT
  - AT-RISK

**COMMENTS:** The Review Authority has downgraded the recommended rating of “Good” to an “Acceptable”. A Plan of Action is required to address the deficiencies in the Food Service , Environmental Health and Safety, and Key and Lock Control standards.

June 24, 2008

MEMORANDUM FOR: James T. Hayes, Jr.  
Acting Director  
Office of Detention and Removal Operations

FROM: [REDACTED] b6, b7c  
Reviewer-In-Charge/SME Security

SUBJECT: El Centro Service Processing Center Annual Detention Review

Creative Corrections conducted the Annual Detention Review (ADR) of the El Centro Service Processing Center (ECSPC) located in El Centro, California, on June 17-19, 2008. As noted on the attached documents, my team of Subject Matter Experts included: [REDACTED] b6, b7c Administration; [REDACTED] b6, b7c, Health Services; [REDACTED] b6, b7c Safety and Environmental Health; and [REDACTED] b6, b7c d Services.

A closeout meeting was held on June 19, 2008, during which all concerns and recommendations were discussed with Assistant Field Office Director, [REDACTED] b6, b7c, [REDACTED] b6, b7c, Assistant Officer in Charge, and key facility staff.

### **Type of Review:**

This review is a scheduled Detention Standard Review to determine compliance with ICE National Detention Standards for facilities used over 72 hours.

### **Review Summary:**

The El Centro Service Processing Center is accredited by American Correctional Association (ACA), National Commission on Correctional Health Care (NCCHC), and the Joint Commission on Accreditation of Healthcare Organizations (JCAHO).

### **Standards Compliance:**

The following statistical information provides a direct comparison of the June 2007 ADR and the ADR conducted in June 2008.

| <b><u>June 2007,</u></b> | <b><u>Review</u></b> | <b><u>June, 2008</u></b> | <b><u>Review</u></b> |
|--------------------------|----------------------|--------------------------|----------------------|
| <b>Compliant</b>         | <b>38</b>            | <b>Compliant</b>         | <b>38</b>            |
| <b>Deficient</b>         | <b>0</b>             | <b>Deficient</b>         | <b>0</b>             |
| <b>At Risk</b>           | <b>0</b>             | <b>At Risk</b>           | <b>0</b>             |
| <b>Non-Applicable</b>    | <b>0</b>             | <b>Non-Applicable</b>    | <b>0</b>             |

## **RIC Issues and Concerns**

### ***Administration***

The overall rating evidenced in the working papers of the ECSPC indicates compliance with all 38 National Detention Standards (NDS). Although there were no deficiencies noted, considerable attention must continue to be afforded to security and life safety concerns discussed below.

It is clear that management has identified security and life safety weaknesses, requested funding for enhancements, and ultimately has received authority for corrective actions. To this end, there are currently multiple, in-progress contractor projects under the supervision of the Facility Manager. Consideration should be given to providing additional subject matter expert(s) to assist with the management of these projects. It is imperative these projects continue to receive the highest priority from management in order that a safe and secure environment for staff, detainees, and the public are maintained.

### ***Life Safety***

The fire safety program provides staff and detainees a sufficient level of safety.

The fire safety systems throughout the facility, including fire alarms, sprinkler systems, kitchen hood fire suppression systems, emergency generators and emergency lighting/exit lights, are not inspected and tested monthly, quarterly, or annually as required by the National Fire Protection Association (NFPA) standards, NFPA 72, NFPA 25 and NFPA 17A, NFPA 110, and NFPA 70. There is a contract with Candelaria Corporation (effective 09/19/07) to conduct testing, inspecting, and maintenance of these systems. On-site inspection and review of documentation failed to verify Candelaria is fulfilling contracted services as required by the statement of work. Candelaria was notified of this problem and is scheduled to begin service on Monday, June 23, 2008. Management should provide direct supervision of the contractor to ensure compliance.

Locking mechanisms used in internal security gates, housing units, and processing unit are not detention grade hardware as required by NFPA 101, A.23.1.2.2.1. A security enhancement project is currently underway to replace all unauthorized locks.

Review of documentation for fire drills indicated that quarterly drills in the housing units were not taking place across all shifts. Corrective action was taken and drills are now being conducted as required. Continued monitoring of the fire drill exercises is essential to ensure staff and detainees are aware of their responsibilities in emergencies.

Management should consider dedicating a position to supervise life safety/environmental health program compliance. Dedicated assistance with the management of this program would enhance safety and security for staff and detainees.

### ***Keys***

b2 high

b2 high

The daily accounting of all keys recently came into compliance with NDS. As a new procedure, ICE supervisory staff should continue to monitor the program carefully until AKAL staff is more familiar with the requirement.

b2 high

### ***Locks***

b2 high

### ***Vehicle Entrance***

b2 high

The review team recommended adding an additional officer position to the vehicle entrance during the review for added security during construction. Management agreed with this recommendation and immediately assigned an officer. Because this entrance is very long, (spanning the length of the facility) it is further recommended this added security post be made permanent with post orders developed to identify position responsibilities.

The entrance project also includes installation of surveillance cameras and monitors. This additional technology will help maintain appropriate supervision and security combined with increased staffing.

The vehicle entrance project must be closely managed to expedite its completion. The facility is at higher risk during this project. Vigilance by all concerned cannot be overstated.

***Fencing***

b2 high

b2 high

***Administration Building Security***

b2 high

***CCTV Control Center***

b2 high

***Medical Vacancies***

There are 30 PHS medical staff positions authorized for ECSPC. Currently, there are six vacancies. Health care accessibility has not been adversely affected by these vacancies however; the positions are necessary and should be encumbered as soon as possible.

***Title 18 Notification***

It is recommended that Title 18 information be posted conspicuously at all facility entrances notifying all persons entering, that alcohol, firearms, ammunition, explosive devices, and guns are prohibited.

## *Lexis Nexis*

Lexis Nexis is provided in English for detainee use. It is recommended that ICE consider making available the Spanish version of Lexis Nexis given the ethnic demographics of the detainee population.

## **Area of Strength**

The frequency of daily, weekly, and unannounced rounds to all housing units by Deportation Officers, Supervisory Deportation Officers, Assistant OIC, and AFOD/OIC is noteworthy as commendable. The spontaneity of rounds and subsequent documentation evidencing action taken is without doubt among the best we have evaluated.

The NDS Compliance Team documentation and preparation is also significant. All documentation and evidence required for the compliance review was made available to the review team. Local policy and procedures have been well developed establishing a solid foundation toward standards compliance. The extensive documentation and policy development ranks well above others we have evaluated.

## **Recommended Rating and Justification**

It is the Reviewer-in-Charge recommendation that the facility receive a rating of “Good.” It is also recommended by the RIC that a Plan of Action be required for this facility to identify and implement necessary corrective actions for the RIC Issues and Concerns.

## **RIC Assurance Statement**

All findings of this review have been documented on the Detention Review Worksheet attached and are supported by the written documentation contained in the review file.





6415 Calder, Suite B • Beaumont, Texas 77706  
409.866.9920 • www.correctionalexperts.com

Making a Difference!

June 24, 2008

MEMORANDUM FOR: James T. Hayes, Jr.  
Acting Director  
Office of Detention and Removal Operations

FROM: [REDACTED] b6, b7c  
Reviewer-In-Charge/SME Security

SUBJECT: El Centro Service Processing Center Annual Detention Review

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**Review Summary:**

The El Centro Service Processing Center is accredited by American Correctional Association (ACA), National Commission on Correctional Health Care (NCCHC), and the Joint Commission on Accreditation of Healthcare Organizations (JCAHO).

**Standards Compliance:**

The following statistical information provides a direct comparison of the June 2007 ADR and the ADR conducted in June 2008.

| <u>June 2007</u> | <u>Review</u> |
|------------------|---------------|
| Compliant        | 38            |
| Deficient        | 0             |
| At Risk          | 0             |
| Non-Applicable   | 0             |

| <u>June, 2008</u> | <u>Review</u> |
|-------------------|---------------|
| Compliant         | 38            |
| Deficient         | 0             |
| At Risk           | 0             |
| Non-Applicable    | 0             |

**Area of Strength**

The frequency of daily, weekly, and unannounced rounds to all housing units by Deportation Officers, Supervisory Deportation Officers, Assistant OIC, and AFOD/OIC is noteworthy as commendable. The spontaneity of rounds and subsequent documentation evidencing action taken is without doubt among the best we have evaluated.

The NDS compliance team documentation and preparation is also significant. All documentation and evidence required for the compliance review was made available to the review team. Local policy and procedures have been well developed, establishing a solid foundation toward standards compliance. The extensive documentation and policy development ranks well above others we have evaluated.

**Recommended Rating and Justification**

It is the Reviewer-in-Charge (RIC) recommendation that the facility receive a rating of “Good.”

**RIC Assurance Statement**

All findings of this review have been documented on the Detention Review Worksheet attached and are supported by the written documentation contained in the review file.



**DETENTION FACILITY INSPECTION FORM  
FACILITIES USED LONGER THAN 72 HOURS**

**A. Type of Facility Reviewed**

|                                     |  |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <b>ICE Service Processing Center</b>           |
| <input type="checkbox"/>            | <b>ICE Contract Detention Facility</b>         |
| <input type="checkbox"/>            | <b>ICE Intergovernmental Service Agreement</b> |

**B. Current Inspection**

|   |
|---|
| Type of Inspection<br><input type="checkbox"/> Field Office <input checked="" type="checkbox"/> HQ Inspection |
| Date[s] of Facility Review<br>June 17-19, 2008  |

**C. Previous/Most Recent Facility Review**

|   |
|---|
| Date[s] of Last Facility Review<br>June 19-21, 2007   |
| Previous Rating<br><input checked="" type="checkbox"/> Superior <input type="checkbox"/> Good <input type="checkbox"/> Acceptable <input type="checkbox"/> Deficient <input type="checkbox"/> At-Risk |

**D. Name and Location of Facility**

|  |
|--|
| Name<br>El Centro Service Processing Center  |
| Address (Street and Name)<br>1115 North Imperial Avenue  |
| City, State and Zip Code<br>El Centro, California  |
| County<br>Imperial   |
| Name and Title of Chief Executive Officer<br>(Warden/OIC/Superintendent)<br>b6, b7c              |
| Telephone # (Include Area Code)<br>(760) 336- b6, b7c  |
| Field Office / Sub-Office (List Office with oversight responsibilities)<br>San Diego, California |
| Distance from Field Office<br>120 miles  |

**E. Creative Corrections Review Team**

|         |                                     |
|---------|-------------------------------------|
| b6, b7c | RIC/SME Security                    |
| b6, b7c | SME Administration                  |
| b6, b7c | SME Safety and Environmental Health |
| b6, b7c | SME Food Service                    |
| b6, b7c | SME Health Services                 |

**F. CDF/IGSA Information Only**

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

**G. Accreditation Certificates**

|  |
|--|
| List all State or National Accreditation[s] received:<br>ACA, NCCHC, JCAHO |
| <input type="checkbox"/> Check box if facility has no accreditation[s]     |

**H. Problems / Complaints (Copies must be attached)**

|   |
|---|
| The Facility is under Court Order or Class Action Finding<br><input type="checkbox"/> Court Order <input type="checkbox"/> Class Action Order |
| The Facility has Significant Litigation Pending<br><input type="checkbox"/> Major Litigation <input type="checkbox"/> Life/Safety Issues      |
| <input checked="" type="checkbox"/> Check if None.  |

**I. Facility History**

|  |   |
|--|---|
| Date Built<br>1975   |   |
| Date Last Remodeled or Upgraded<br>Presently under Construction  |   |
| Date New Construction / Bed space Added<br>None  |   |
| Future Construction Planned<br><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No    Date: Commenced June 2007 to Present |   |
| Current Bed Space<br>544   | Future Bed Space (# New Beds only)<br>Number: N/A Date: N/A |

**J. Total Facility Population**

|   |
|---|
| Total Facility Intake for previous 12 months<br>5,409 |
| Total ICE Mandays for Previous 12 months<br>168,492   |

**K. Classification Level (ICE SPCs and CDFs Only)**

|              | L-1 | L-2 | L-3 |
|--------------|-----|-----|-----|
| Adult Male   | 273 | 137 | 65  |
| Adult Female | N/A | N/A | N/A |

**L. Facility Capacity**

|              | Rated | Operational | Emergency |
|--------------|-------|-------------|-----------|
| Adult Male   | 544   | 480         | 562       |
| Adult Female | N/A   | N/A         | N/A       |

Facility holds Juveniles Offenders 16 and older as Adults

**M. Average Daily Population**

|              | ICE | USMS | Other |
|--------------|-----|------|-------|
| Adult Male   | 462 | 0    | 0     |
| Adult Female | N/A | N/A  | N/A   |

**N. Facility Staffing Level**

|                      |         |
|----------------------|---------|
| Security:<br>b2 high | b2 high |
|----------------------|---------|

|  |
|--|
| <b>AKAL SECURITY CONTRACT # 8CL-2-C-0003</b><br><b>\$59,499,905.52</b> |
| <b>AHTNA CONTRACT # HSCEOP-07-C-00016</b><br><b>\$58,845.32</b>        |

## SIGNIFICANT INCIDENT SUMMARY WORKSHEET

In order for Creative Corrections to complete its review of your facility, you must complete the following worksheet prior to your scheduled review dates. This worksheet must contain data for the past twelve months. We will use this worksheet in conjunction with the ICE Detention Standards to assess your detention operations with regard to the needs of ICE and its detainee population. Failure to complete this worksheet will result in a delay in processing this report, and may result in a reduction or removal of ICE detainees from your facility.

| INCIDENTS  | DESCRIPTION  | Jan – Mar | Apr – Jun | Jul – Sep | Oct – Dec |
|--|--|-----------|-----------|-----------|-----------|
| Assaults   | Types (Sexual <sup>1</sup> , Physical, etc.)                                 | P         | P         | P         | P         |
|  | With Weapon  | 0         | 0         | 0         | 0         |
|  | Without Weapon   | 1         | 3         | 1         | 3         |
| Assault:<br>Detainee on<br>Staff   | Types (Sexual Physical, etc.)  | 0         | 0         | 0         | 0         |
|  | With Weapon  | 0         | 0         | 0         | 0         |
|  | Without Weapon   | 0         | 0         | 0         | 0         |
| Number of Forced Moves, incl.<br>Forced Cell Moves <sup>2</sup>                |  | 0         | 0         | 0         | 0         |
| Disturbances <sup>3</sup>  |  | 0         | 0         | 0         | 0         |
| Number of Times Chemical<br>Agents Used  |  | 0         | 0         | 0         | 0         |
| Number of Times Special<br>Reaction Team Deployed/Used                         |  | 0         | 0         | 0         | 0         |
| # Times Four/Five Point<br>Restraints Applied/Used                             | Number/Reason (M=Medical,<br>V=Violent Behavior, O=Other)                    | 0         | 0         | 0         | 0         |
|  | Type (C=Chair, B=Bed,<br>BB=Board, O=Other)                                  | 0         | 0         | 0         | 0         |
| Offender / Detainee Medical<br>Referrals as a Result of Injuries<br>Sustained. |  | 0         | 0         | 0         | 0         |
| Escapes  | Attempted  | 0         | 0         | 0         | 0         |
|  | Actual   | 0         | 0         | 0         | 0         |
| Grievances   | # Received   | 43        | 37        | 13        | 11        |
|  | # Resolved in Favor of<br>Offender/Detainee                                  | 19        | 13        | 5         | 6         |
| Deaths   | Reason (V=Violent, I=Illness,<br>S=Suicide, A=Attempted<br>Suicide, O=Other) | 0         | 0         | 0         | 0         |
|  | Number   | 0         | 0         | 0         | 0         |
| Psychiatric / Medical Referrals  | # Medical Cases Referred for<br>Outside Care                                 | 17        | 15        | 17        | 5         |
|  | # Psychiatric Cases Referred<br>for Outside Care                             | 1         | 0         | 0         | 0         |

<sup>1</sup> Oral, anal or vaginal penetration or attempted penetration involving at least 2 parties, whether it is consenting or non-consenting

<sup>2</sup> Routine transportation of detainees/offenders is not considered "forced"

<sup>3</sup> 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

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## DHS/ICE DETENTION STANDARDS REVIEW SUMMARY REPORT

| 1. ACCEPTABLE                 | 2. DEFICIENT   | 3. AT-RISK | 4. REPEAT FINDING | 5. NOT APPLICABLE |                                     |                          |                          |                          |                          |                          |
|-------------------------------|--|------------|-------------------|-------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <b>LEGAL ACCESS STANDARDS</b> |  |            |                   |                   | 1.                                  | 2.                       | 3.                       | 4.                       | 5.                       |                          |
| 1.                            | Access to Legal Materials                              |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 2.                            | Group Presentations on Legal Rights                    |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 3.                            | Visitation   |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 4.                            | Telephone Access                                       |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| <b>DETAINEE SERVICES</b>      |  |            |                   |                   |                                     |                          |                          |                          |                          |                          |
| 5.                            | Admission and Release                                  |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 6.                            | Classification System                                  |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 7.                            | Correspondence and Other Mail                          |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 8.                            | Detainee Handbook                                      |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 9.                            | Food Service   |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 10.                           | Funds and Personal Property                            |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 11.                           | Detainee Grievance Procedures                          |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 12.                           | Issuance and Exchange of Clothing, Bedding, and Towels |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 13.                           | Marriage Requests                                      |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 14.                           | Non-Medical Emergency Escorted Trip                    |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 15.                           | Recreation   |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 16.                           | Religious Practices                                    |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 17.                           | Voluntary Work Program                                 |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>HEALTH SERVICES</b>        |  |            |                   |                   |                                     |                          |                          |                          |                          |                          |
| 18.                           | Hunger Strikes   |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 19.                           | Medical Care   |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 20.                           | Suicide Prevention and Intervention                    |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 21.                           | Terminal Illness, Advanced Directives and Death        |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| <b>SECURITY AND CONTROL</b>   |  |            |                   |                   |                                     |                          |                          |                          |                          |                          |
| 22.                           | Contraband   |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 23.                           | Detention Files  |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 24.                           | Disciplinary Policy                                    |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 25.                           | Emergency Plans  |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 26.                           | Environmental Health and Safety                        |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 27.                           | Hold Rooms in Detention Facilities                     |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 28.                           | Key and Lock Control                                   |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 29.                           | Population Counts                                      |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 30.                           | Post Orders  |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 31.                           | Security Inspections                                   |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 32.                           | Special Management Units (Administrative Detention)    |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 33.                           | Special Management Units (Disciplinary Segregation)    |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 34.                           | Tool Control   |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 35.                           | Transportation (Land management)                       |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 36.                           | Use of Force   |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 37.                           | Staff / Detainee Communication (Added August 2003)     |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |
| 38.                           | Detainee Transfer (Added September 2004)               |            |                   |                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                          |

**ALL FINDINGS OF DEFICIENT AND AT-RISK REQUIRE WRITTEN COMMENT DESCRIBING THE FINDING AND WHAT IS NECESSARY TO REACH COMPLIANCE.**

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## RIC REVIEW ASSURANCE STATEMENT

BY SIGNING BELOW, THE REVIEWER-IN-CHARGE (RIC) CERTIFIES THAT:

1. ALL FINDINGS OF NON-COMPLIANCE WITH POLICY OR INADEQUATE CONTROLS, AND FINDINGS OF NOTEWORTHY ACCOMPLISHMENTS, CONTAINED IN THIS INSPECTION REPORT, ARE SUPPORTED BY EVIDENCE THAT IS SUFFICIENT AND RELIABLE; AND
2. WITHIN THE SCOPE OF THIS REVIEW, THE FACILITY IS OPERATING IN ACCORDANCE WITH APPLICABLE LAW AND POLICY, AND PROPERTY AND RESOURCES ARE BEING EFFICIENTLY UTILIZED AND ADEQUATELY SAFEGUARDED, EXCEPT FOR ANY DEFICIENCIES NOTED IN THE REPORT.

### REVIEWER-IN-CHARGE

|   |  |
|---|--|
| Reviewer-In-Charge: (Print Name)<br>_____<br>b6, b7c<br>Title & Duty Location<br>_____<br>Reviewer in Charge/SME Security | Signature<br>_____<br>Date<br>June, 20, 2008 |
|---|--|

### TEAM MEMBERS

|   |  |
|---|--|
| Print Name, Title, & Duty Location<br>_____<br>b6, b7c SME Administration<br>Print Name, Title, & Duty Location<br>_____<br>b6, b7c SME Safety and Environmental Health | Print Name, Title, & Duty Location<br>_____<br>b7c SME Health Services<br>Print Name, Title, & Duty Location<br>_____<br>b6, b7c SME Food Services |
|---|--|

- RECOMMENDED RATING:**
- SUPERIOR
  - GOOD
  - ACCEPTABLE
  - DEFICIENT
  - AT-RISK

**Comments:** While the overall compliance rating evidenced in the working papers of the El Centro Service Processing Center indicates compliance in all 38 National Detention Standards, considerable attention should continue to be given to security and life safety concerns discussed in the final report. It is clear that management has identified security and life safety weaknesses, requested funding for enhancements, and ultimately has received authority for corrective action. To this end, there are currently multiple contactor projects ongoing. It is imperative these projects continue to receive the highest priority from management in order that a safe and secure environment for staff, detainees, and the public are maintained.

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# ICE Detention Standards Compliance Review

**El Centro Service Processing Center**

June 17-19, 2008

REPORT DATE – June 24, 2008



Contract Number: ODT-6-D-0001  
Order Number: HSCEOP-07-F-01016

Percy H. Pitzer, Executive Vice President  
Creative Corrections  
6415 Calder, Suite B  
Beaumont, TX 77706

U.S. Imm [REDACTED] COTR  
[REDACTED] oms Enforcement  
Detention Standards Compliance Unit  
801 I Street NW  
Washington, DC 20536

## Condition of Confinement Review Worksheet

(This document must be attached to each Inspection Form)

**This Form to be used for Inspections of Facilities used longer than 72 Hours**

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### Detention Review Worksheet

- Local Jail – IGSA
- State Facility – IGSA
- ICE Contract Detention Facility
- Service Processing Center

|   |
|---|
| <b>Name</b><br><i>El Centro Service Processing Center</i>   |
| <i>1115 North Imperial Avenue</i>   |
| <i>El Centro, California</i>  |
| <b>County</b><br><i>Imperial</i>  |
| <b>Name and Title of Chief Executive Officer (Warden/OIC/Superintendent)</b><br>[Redacted: b6, b7c]   |
| <b>Name and Title of Reviewer-In-Charge</b><br>[Redacted: b6, b7c]  |
| <b>Date[s] of Review</b><br><i>June 17-19, 2008</i>   |
| <b>Type of Review</b><br><input checked="" type="checkbox"/> <b>Headquarters</b> <input type="checkbox"/> <b>Operational</b> <input type="checkbox"/> <b>Special Assessment</b> <input type="checkbox"/> <b>Other</b> |



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**NOTE:** FOR EACH STANDARD RATED BELOW ACCEPTABLE, FACILITIES MUST ATTACH A PLAN OF ACTION FOR BRINGING OPERATIONS INTO COMPLIANCE. EACH FACILITY SHOULD EXAMINE THE ENTIRE WORKSHEET TO IDENTIFY AREAS OF IMPROVEMENT, INCLUDING THOSE STANDARDS WHERE AN OVERALL FINDING OF ACCEPTABLE WAS ACHIEVED.

**SECTION I.  
LEGAL ACCESS STANDARDS**

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**ACCESS TO LEGAL MATERIALS**

**POLICY:** FACILITIES HOLDING ICE DETAINEES SHALL PERMIT DETAINEES ACCESS TO A LAW LIBRARY, AND PROVIDE LEGAL MATERIALS, FACILITIES, EQUIPMENT, DOCUMENT COPYING PRIVILEGES, AND THE OPPORTUNITY TO PREPARE LEGAL DOCUMENTS.

| COMPONENTS  | Y                                   | N                                   | NA                       | REMARKS  |
|---|-------------------------------------|-------------------------------------|--------------------------|--|
| The facility provides a designated law library for detainee use.  | <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 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 provides seating for 20 detainees, 6 large tables, is well lit, clean and orderly. |
| The law library is adequately equipped with typewriters and/or computers, and has sufficient supplies for daily use by the detainees.   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | The Law Library provides 6 Lexis Nexis stations and 6 typewriters for detainee use.                |
| In addition to the physical law library, detainees have access to the Lexis Nexis electronic law library.   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |  |
| Where provided, the Lexis Nexis library is updated and is current.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |  |
| 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 ICE prior to inclusion.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |  |
| There is a designated ICE or facility employee who inspects, updates, and maintains/replaces legal materials and equipment on a routine basis.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | The Facility Recreation Specialists are responsible for oversight of the Law Library.              |
| Detainees are offered a minimum 5 hours per week in the law library. <u>Detainees are not required to forego recreation time in lieu of library usage.</u> Detainees facing a court deadline are given priority use of the law library.   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Detainees are offered opportunity for at least 5 hours per week in the law library.                |
| Detainees may request materials not currently in the law library. Each request is reviewed and, where appropriate, an acquisition request is timely initiated. Requests for copies of court decisions are accommodated within 3 – 5 business days.                                | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |  |
| Detainees are permitted 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"/> | Detainees are allowed to assist others in researching and preparing legal documents.               |
| Illiterate or non-English-speaking detainees without legal representation receive access to more than just English-language law books after indicating their need for help.   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | ECSPC does not have non-English language law books or non-English Lexis Nexis at this time.        |
| 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"/> |  |
| Detainees housed in Administrative Detention 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"/> |  |
| All denials of access to the law library fully documented.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |  |
| Facility staff informs ICE Management when a detainee or group of detainees is denied access to the law library or law materials.   | <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"/> |  |

ACCEPTABLE     
  DEFICIENT     
  AT-RISK     
  REPEAT FINDING

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**REMARKS:**

ECSPC has a very good law library and procedures in place to give ICE detainees access to the library and other legal materials. Although not mandated by policy, law books and Lexis Nexis in a Spanish version would assist non-English literate detainees with legal research.

b6, b7c

/ June 19, 2008

**AUDITOR S SIGNATURE / DATE**

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**GROUP LEGAL RIGHTS PRESENTATIONS**

**POLICY:** FACILITIES HOUSING ICE DETAINEES SHALL PERMIT AUTHORIZE 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.

**CHECK HERE IF NO GROUP PRESENTATIONS WERE CONDUCTED WITHIN THE PAST 12 MONTHS. MARK STANDARD AS ACCEPTABLE OVERALL AND CONTINUE ON WITH NEXT PORTION OF WORKSHEET.**

| COMPONENTS  | YES                      | NO                       | NA                       | REMARKS |
|---|--------------------------|--------------------------|--------------------------|---------|
| The Field Office is responsive to requests by attorneys and accredited representatives for group presentations.   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| Upon receipt of concurrence by the Field Office Director, the facility or authorized ICE Field Office ensures timely and proper notification to attorneys or accredited representatives.  | <input 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 type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| Posters announcing presentations appear in common areas at least 48 hours in advance and sign-up sheets are available and accessible.   | <input 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 type="checkbox"/> |         |
| When the number of detainees allowed to attend a presentation is limited, the facility provides a sufficient number of presentations so that all detainees signed up may attend.  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| Detainees in segregation, unable to attend for security reasons, may request separate sessions with presenters. Such requests are documented.   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| Interpreters are admitted when necessary to assist attorneys and other legal representatives.   | <input 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 type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| Staff permits presenters to distribute ICE-approved materials.  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| Presenters are permitted to meet with small groups of detainees to discuss their cases after the group presentation. ICE or authorized detention staff is present but do not monitor conversations with legal providers.  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| Group presenters who have had their privileges suspended are notified in writing by the Field Office Director or designee; and the reasons for suspension are documented. The Headquarters Office for Detention and Removal, Field Operations and Detention management Division, is notified when a group or individual is suspended from making presentations. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| The facility plays ICE-approved videotaped presentations on legal rights at regular opportunities, at the request of outside organizations.   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| A copy of the Group Legal Rights Presentation policy, including attachments, is available to detainees upon request   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |

**ACCEPTABLE**     
  **DEFICIENT**     
  **AT-RISK**     
  **REPEAT FINDING**

**REMARKS:**

ECSPC has had no requests from outside persons or groups to make presentations regarding legal rights. The facility has excellent policy in place to accommodate authorized requests should they occur.

b6, b7c / June 19, 2008

**AUDITOR'S SIGNATURE / DATE**

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**VISITATION**

**POLICY: ICE SHALL PERMIT DETAINEES TO VISIT WITH FAMILY, FRIENDS, LEGAL REPRESENTATIVES, SPECIAL INTEREST GROUPS, AND THE NEWS MEDIA.**

| COMPONENTS  | Y                                   | N                        | NA                                  | REMARKS  |
|---|-------------------------------------|--------------------------|-------------------------------------|--|
| There is a written visitation schedule and hours for general visitation.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Visitation hours are published in the Detainee Handbook, displayed at the front entrance, and provided in a "Visitation Handout" distributed in the front lobby. |
| The visitation hours tailored to the detainee population and the demand for visitation.   | <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"/>            | ECSPC makes the schedule and procedures available to the public, both in written form "Visitation Handout" and telephonically.                                   |
| 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 facility maintains a general visitation log as well as a "Attorney Visit" log.   |
| The detainees are permitted to retain personal property items specified in the standard.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| 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"/>            | The facility allows minor visitors under direct supervision of a accompanying adult.   |
| At facilities where there is no provision for visits by minors, 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"/> | ECPC does allow minors to visit.   |
| 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"/> | ECPC does allow minors to visit.   |
| Detainees in special housing are afforded visitation.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Detainees housing in the Special Management Unit retain visitation privileges.   |
| 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 are 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"/>            |  |
| Private consultation rooms are available for attorney meetings. There is a mechanism for the detainee and his/her representative to exchange documents.             | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Four private consultation rooms are available for attorney meetings. Documents may be exchanged through the secure document tranfer portal.                      |

**VISITATION**

**POLICY: ICE SHALL PERMIT DETAINEES TO VISIT WITH FAMILY, FRIENDS, LEGAL REPRESENTATIVES, SPECIAL INTEREST GROUPS, AND THE NEWS MEDIA.**

|  |                                     |                          |                                     |  |
|--|-------------------------------------|--------------------------|-------------------------------------|--|
| There are written procedures governing detainee searches.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Detainee search procedures are contained in the SOP Admisson and Release, Section 3, C.  |
| When strip searches are required after every contact visit 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"/> | ECPC does not require strip seaches following visitation.  |
| 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 Field Office Director.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| 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 who request to visit with a detainee are referred to the ICE Field Office 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 or ICE Field Office.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| 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"/>            | Medical or psychological examination by a practitioner or expert not associated with ICE or the facility is permitted to provide a detainee with information useful in administrative proceedings (SOP, Visitation, Section O, 5.) |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b> |                                     |                          |                                     |  |

**REMARKS:**

ECSPC has four small non-contact visitation rooms, which are used to accommodate all visitations at the facility. The ICE detention standard regarding visitation encourages each facility to provide a visitation area appropriately furnished and arranged, and as comfortable and pleasant as practical, although policy and procedures regarding visitation are in full compliance, the visitation area needs upgrading.

b6, b7c / June 19, 2008  
**AUDITOR'S SIGNATURE / DATE**

**DETAINEE TELEPHONE ACCESS**

**POLICY:** ALL FACILITIES HOUSING ICE DETAINEES WILL PERMIT DETAINEES' REASONABLE AND EQUITABLE ACCESS TO TELEPHONES.

| COMPONENTS   | Y                                   | N                        | NA                       | REMARKS   |
|--|-------------------------------------|--------------------------|--------------------------|---|
| Detainees are 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"/> | Information regarding telephone access is provided in the Detainee Handbook, page 12.   |
| Access rules are posted in housing units.  | <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"/> |   |
| 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"/> | The ECPC rated capacity is 544, there are 53 telephones available.  |
| Telephones are inspected regularly by facility staff to ensure that they are in good working order.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Procedures require the phones to be checked daily utilizing the "Health, Safety, and Security Shift Report."  |
| 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 takes appropriate measures to ensure that 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"/> | Unit phones have privacy panels in place.   |
| 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"/> | A Detainee may request staff assistance regarding a private legal call, use of an office phone or other special arrangement may be provided.                |
| 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"/> |   |
| Special Access calls are at no charge to the detainees.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The OIG phone number for reporting abuse is programmed into the detainee phone system and the phone number was checked by the inspector during the review.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The OIG hotline number is accessible through the speed dial process. Instructions are available at the phone banks, as well as on the unit bulletin boards. |
| In facilities unable to fully meet this requirement initially because of limitations of its telephone service, ICE makes alternate arrangements to provide required access within 24 hours of a request by a detainee. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input 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 Facility.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Any telephone restrictions are documented.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The facility has a system for taking and delivering emergency detainee telephone messages.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| 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"/> | Unless  |

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**DETAINEE TELEPHONE ACCESS**

**POLICY:** ALL FACILITIES HOUSING ICE DETAINEES WILL PERMIT DETAINEES' REASONABLE AND EQUITABLE ACCESS TO TELEPHONES.

| COMPONENTS  | Y                                   | N                        | 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"/> | ECSPC permits detainees housed in SMU to make direct and/or free calls.  |
| 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 are allowed phone calls for family emergencies.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Detainees in administrative detention and protective custody are afforded the same telephone 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"/> | ECPC has monitoring notification posted at the phones, although phone monitoring is not on-going at this time. |

**ACCEPTABLE**     
  **DEFICIENT**     
  **AT-RISK**     
  **REPEAT FINDING**

**REMARKS:**

The facility has an adequate number of accessible phones available to the inmate population.

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## **SECTION II.**

### **DETAINEE SERVICES STANDARDS**

#### **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.

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| COMPONENTS   | Y                                   | N                        | NA                       | REMARKS   |
|--|-------------------------------------|--------------------------|--------------------------|---|
| In-processing includes an orientation of the facility. The orientation includes: Unacceptable activities and behavior, and corresponding sanctions; How to contact ICE; 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, count procedures, access to and use of the law library and the general library; sick-call procedures, and the detainee handbook. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The orientation process includes issuance of the Detainee Handbook and is supported by an orientation video. The facility has procedures in place to communicate effectively with different languages, including an interpreter service (InterpreTalk). |
| Medical screenings are performed by medical staff <b>or</b> 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"/> | All new intakes are screened by medical staff in compliance with the "Detainee Access to Medical Care" Standard.  |
| Each new arrival is classified according to criminal history and threat levels. Criminal history is provided for each detainee by the ICE field office.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Admission staff use documentation from the field agent, the I-216, the Alien Booking Record (Form I-385), the medical questionnaire, and other information contained in the accompanying A File to classify each new detainee.                          |
| All new arrivals are 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The facility uses form G-1025 "Record of Search" and conducts searches in compliance with the "Detainee Search Standard."   |
| Detainees are stripped searched only when cause has been established and not as routine policy. Non-criminal detainees are not strip-searched but are patted down, unless reasonable suspicion is established.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | A supervisor must approve any strip search even for cause. The search is documented on Form G-1025.   |
| The "Contraband" standard governs all personal property searches. IGSA's/CDFs 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"/> | ECSPC prepares a complete inventory of all detainee personal property (form G-589) Detainee Personal Property Receipt. The detainee signs and receives a copy of the document.  |
| Staff completes Form I-387 or similar form for CDFs and IGSA's for every lost or missing property claim. Facilities forward all I-387 claims to ICE.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | An Officer completes Form I-387, "Report of Detainee's Missing Property" if a detainee claims lost or missing property.   |
| Detainees are issued appropriate and sufficient clothing and bedding for the climatic conditions.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Initial issue includes bedding and clothing in number and weights appropriate for the facility environment and local weather conditions.  |
| 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"/> | The facility issues personal hygiene items during intake. They are issued and replenished as needed without charge to the detainee.   |
| All releases are properly coordinated with ICE using a Form I-203.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The facility uses Form I-203 to document releases.  |
| Staff completes paperwork/forms for release as required.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |

**ADMISSION AND RELEASE**

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| COMPONENTS  | Y                                | N                                       | NA | REMARKS |
|---|----------------------------------|---|----|---------|
| <input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT | <input type="checkbox"/> AT-RISK | <input type="checkbox"/> REPEAT FINDING |    |         |

**REMARKS:**

ECSPC has excellent policy and procedures in place regarding admission and release. Processing staff are professional and diligent in the performance of their duties.

b6, b7c June 19, 2008  
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**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  | Y                                   | N                        | NA                       | REMARKS   |
|---|-------------------------------------|--------------------------|--------------------------|---|
| The facility has a system for classifying detainees. In CDFs and IGSAAs, an Objective Classification System or similar is used. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ECSPC has an objective classification system based upon directives contained in the |

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**CLASSIFICATION SYSTEM**

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| COMPONENTS  | Y                                   | N                        | NA                       | REMARKS   |
|---|-------------------------------------|--------------------------|--------------------------|---|
|   |                                     |                          |                          | National Detention Standard titled "Detainee Classification System."                      |
| The facility classification system includes: <ul style="list-style-type: none"> <li>Classifying detainees upon arrival;</li> <li>Separating from the general population those individuals who cannot be classified upon arrival; and</li> <li>The first-line supervisor or designated classification specialist reviewing every classification decision.</li> </ul> | <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"/> | All available documentation and information is utilized by the intake/processing officer. |
| 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.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Detainees are assigned a security level and housing assignment based upon the DCS score.  |
| 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. At IGSA's, detainees may request reassessment 60 days after arrival.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Detainees at ECPC are reassessed 45 to 60 days after initial classification.              |
| Procedures exist for a detainee to appeal their classification assignment. 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"/> | The SDDO for Det Ops. has the authority to reduce a classification level on appeal        |
| 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 designations may be appealed to a higher authority, such as the Warden or equivalent.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The detainee may appeal a SDDO decision to the AFOD.                                      |
| 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"/> | Detainee Handbook, Classification Levels, page 4/5.                                       |

**ACCEPTABLE**     
  **DEFICIENT**     
  **AT-RISK**     
  **REPEAT FINDING**

**REMARKS:**

Detainees are classified using available pertinent information. The detainee classification form and resultant comprehensive custody score play a major role to further the safety and security of the facility.

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**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 rules for correspondence and other mail are posted in each housing or common area, or provided to each detainee via a detainee handbook.   | <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"/> | Key information is provided in Spanish in all units.   |
| Incoming mail is distributed to detainees within 24 hours or 1 business day after it is received and inspected.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Outgoing mail is delivered to the postal service within one business day of its entering the internal mail system (excluding weekends and holidays).   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Staff does not open and inspect incoming general correspondence and other mail (including packages and publications) without the detainee present unless documented and authorized in writing by the Warden or equivalent for prevailing security reasons.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The mailroom officer identifies the detainee, and then opens the mail in his presence.   |
| Staff does not read incoming general correspondence without the Warden's prior written 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 is 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. | <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"/> | The AFOD may reject incoming or outgoing mail. The detainee and/or sender receives notification of the rejection.  |
| The official authorizing censorship or rejection of outgoing mail provides the detainee with signed written notice.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Staff maintains a written record of every item removed from detainee mail.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The Warden or equivalent 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"/> |  |
| The procedure for safeguarding cash removed from a detainee protects the detainee from loss of funds and theft. 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"/> | The mail room officer documents funds received in the mail, the detainee may retain amounts under \$40.00, otherwise the detainee is escorted to processing where a receipt is issued. |
| Original identity documents (e.g., passports, birth certificates) are immediately removed and forwarded to ICE staff for placement in A-files.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Staff provides the detainee a copy of his/her identity document(s) upon request.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |

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|   |                                     |                          |                          |   |
|---|-------------------------------------|--------------------------|--------------------------|---|
| 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, reasonable correspondence about a legal matter, in three one ounce letters per week and packages deemed necessary by ICE. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ECPC places no limitations on legal mail.                                 |
| 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"/> | ECPC does not sell stamps, outgoing mail is stamped by a metered machine. |
| The facility provides writing paper, envelopes, and pencils at no cost to ICE detainees.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |

**ACCEPTABLE**     
  **DEFICIENT**     
  **AT-RISK**     
  **REPEAT FINDING**

**REMARKS:**

Detainees send and receive correspondence in a timely manner.

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### 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   | Y                                   | N                        | NA                       | REMARKS  |
|--|-------------------------------------|--------------------------|--------------------------|--|
| 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"/> | The handbook consists of 44 pages with an easy to read table of contents in the front.                         |
| The handbook is supplemented by 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"/> | All revisions are posted on the detainee bulletin boards immediately and copies included in the handbook.      |
| 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 compliance unit completes annuals reviews of the handbook and makes revisions as needed.                   |
| The detainee handbook addresses the following issues: <ul style="list-style-type: none"> <li>• Personal Items permitted to be retained by the detainee; and</li> <li>• Initial issue of clothes, bedding and personal hygiene items.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | These issues are covered on page 3.  |
| The detainee handbook states in clear language the basic detainee responsibilities.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Very clear and concise, easy to read and understand.   |
| The handbook clearly outlines the methods for classification of detainees, explains each level, and explains the classification appeals process.   | <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"/> | The section on initial admission states that ordinarily a medical screening and an examination within 14 days. |
| The handbook describes the facility, housing units, dayrooms, in-dorm activities, and special housing units.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The handbook describes official count times and count procedures; meal times and feeding procedures; procedures for medical or religious diets; 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"/> | All items are fully addressed throughout the handbook.   |
| 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"/> | Razors are issued on a daily basis during shift 3 and must be turned back in after use.                        |
| The handbook describes barber hours and hair cutting restrictions.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Page 11 fully describes the barbering operations.  |
| The handbook describes the telephone policy; debit card procedures; direct and free calls; locations of telephones; policy when telephone demand is high; and policy and procedures for emergency phone calls.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Access to telephones are covered on pages 12 and 13.   |
| 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"/> | There is no commissary only vending machines.  |
| The handbook describes the detainee voluntary work program.  | <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 and regular visitation hours, policies, and procedures.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Visiting hours for attorneys are unrestricted.   |
| The handbook describes the facility contraband policy.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Contraband issues are addressed  |

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### DETAINEE HANDBOOK

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| COMPONENTS  | Y                                   | N                        | NA                       | REMARKS  |
|---|-------------------------------------|--------------------------|--------------------------|--|
|   |                                     |                          |                          | on page 36.  |
| 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"> <li>• Prohibited acts and severity scale sanctions;</li> <li>• Time limits in the Disciplinary Process; and</li> <li>• Summary of the Disciplinary Process.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Detainee discipline policies are covered in detail on pages 21-31.   |
| The grievance section of the handbook explains all steps in the grievance process – Including: <ul style="list-style-type: none"> <li>• Informal (if used) and formal grievance procedures;</li> <li>• The appeals process;</li> <li>• <u>In CDF</u> facilities: procedures for filing an appeal of a grievance with ICE.</li> <li>• Staff/detainee availability to help during the grievance process.</li> <li>• Guarantee against staff retaliation for filing/pursuing a grievance.</li> <li>• How to file a complaint about officer misconduct with the Department of Homeland Security.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Page 31 & 32 of the handbook describes in detail the grievance procedures and all steps associated with the process. |
| The detainee handbook describes the medical 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"> <li>• Outdoor recreation hours.</li> <li>• Indoor recreation hours.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The handbook describes the detainee dress code for daily living; and work assignments.  | <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"/> | There are 14 detainee rights and responsibilities discussed on pages 43 and 44.                                      |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b>  |                                     |                          |                          |  |

**REMARKS:**

The detainee handbook consists of 44 pages. There is a table of contents at the beginning of the handbook that covers each required item addressed in this standard. The handbook is very thorough and written in easy to understand language. It provides the detainees with adequate information to meet their required responsibilities and provides the information necessary for them to address their concerns. The section on grievance procedures is very thorough and provides all the necessary information for detainees to address any concern through the grievance process.

b6, b7c

/ June 19, 2008

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## 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   | Y                                   | N                                   | NA                                  | REMARKS   |
|--|-------------------------------------|-------------------------------------|-------------------------------------|---|
| The food service program is under the direct supervision of a <u>professionally trained</u> and certified food service administrator. Responsibilities of cooks and cook foremen are in writing. The Food Service Administrator (FSA) determines the responsibilities of the Food Service Staff. | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | The Food Service Manager is certified under the Serv-Safe Program. The FSA has attended Food Service Management courses.  |
| The Cook Supervisor is on duty on days when the FSA is off duty and vice versa.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | There is a Food Service Administrator and an Assistant Food Service Administrator. There is always one of the managers on duty.   |
| The FSA provides food service employees with training that specifically addresses detainee-related issues. <ul style="list-style-type: none"> <li>• In ICE Facilities this includes a review of the ICE "Food Service" standard</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | After looking at staff training records which shows that all areas are being covered. The present staff have been on their job since December 2007.   |
| Knife cabinets close with an approved locking device, and the on-duty cook foreman maintains control of the key that locks the device.   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | The knife cabinet is in an approved cabinet with an approved locking device. All the food service staff has a key to the knife cabinet. Remove the knife cabinet key from all keys rings so that only the Cook Supervisor in charge of the kitchen, has the control of all knives and tools being issued. |
| All knives not in a secure cutting room are physically secured to the workstation and staff directly supervises detainees using knives at these workstations. Staff monitors the condition of knives and dining utensils.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |   |
| When necessary, special procedures govern the handling of food items that pose a security threat.  | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Yeast, Nutmeg, Cloves, Alcohol Based Flavorings and Mace are not utilized in this facility.   |
| Operating procedures include daily searches (shakedowns) of detainee work areas.   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |   |
| The FSA monitor staff implementation of the facility's population counts procedures. Staff is trained in count procedures.   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | All food service staff have received training in count procedures. The FSA monitors the count procedures as the staff are conducting them.  |
| 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"/>            | All detainees assigned were in clean and neat clothing for the week of the review.  |
| 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"/>            | The FSA reviews detainees job description annually to ensure that they are kept up-to-date..  |
| The Cook Foreman or equivalent 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"/>            | All new detainees assigned to food service receives and signs for the rules and procedures of their new job assignment.   |

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## 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   | Y                                   | N                                   | NA                       | REMARKS   |
|--|-------------------------------------|-------------------------------------|--------------------------|---|
| During orientation and training session(s), the CS explains and demonstrates: <ul style="list-style-type: none"> <li>• Safe work practices and methods;</li> <li>• Safety features of individual products/pieces of equipment; and</li> <li>• Training covers the safe handling of hazardous material[s] the detainees are likely to encounter in their work.</li> </ul>             | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |   |
| The Cook Supervisor documents all training in individual detainee detention files.   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | All training is document and kept on file for each detainee.  |
| Detainees at CDFs are paid in accordance with the "Voluntary Work Program" standard. Detainee workers at IGSAs are subject to local and state rules and regulations regarding detainee pay.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Detainees who work in this facility are paid according to the policy and procedures within the Voluntary Work Program Standards.  |
| 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"/> | Detainees are served at least two hot meals a day. There is no more then 14 hours between dinner and breakfast of the next day.<br>Breakfast - 0600<br>Lunch - 1100<br>Dinner - 1630                    |
| For cafeteria style operations, a transparent "sneeze guard" protects both the serving line and salad bar line.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |   |
| The facility has a standard 35-day menu cycle. IGSAs 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"/> | The facility considers the ethnic diversity of the detainees i.e. Pepper Steak, Stir-Fry Dishes, Meat Burritos, Tacos, Spanish Rice, Lasagna, Spaghetti.  |
| A registered dietitian conducts a complete nutritional analysis of every master-cycle menu planned.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | A registered dietitian conducts a complete nutritional analysis on all menus that are used in the daily preparation of all meals.   |
| The FSA 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"/> | Approved recipes are used by all food service workers and staff.  |
| The Cook Foreman has the authority to change menu items if necessary. <ul style="list-style-type: none"> <li>• If yes, documenting each substitution, along with its justification</li> <li>• With copy to FSA</li> </ul>  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | The cook supervisor cannot change any menu items.   |
| 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"/> |   |
| A common-fare menu available to detainees whose dietary requirements cannot be met on the main line. <ul style="list-style-type: none"> <li>• Changes to the planned common-fare menu can be made at the facility level;</li> <li>• Hot entrees are offered three times a week;</li> <li>• The common-fare menus satisfy nutritional recommended daily allowances (RDAs);</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | There is a common fare menu used. Hot entrees are offered at least three times a week. The common fare meets all the nutritional requirements for daily allowances. All common fare meals are served on |

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## 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   | Y                                   | N                        | NA                       | REMARKS  |
|--|-------------------------------------|--------------------------|--------------------------|--|
| <ul style="list-style-type: none"> <li>• Staff routinely provide hot water for instant beverages and foods;                             <ul style="list-style-type: none"> <li>○ Common-fare meals are served with:                                     <ul style="list-style-type: none"> <li>▪ Disposable plates and utensils.</li> <li>▪ Reusable plates and utensils.</li> </ul> </li> </ul> </li> <li>• Staff use separate cutting boards, knives, spoons, scoops, etc., to prepare the common-fare diet items.</li> </ul>                                      |                                     |                          |                          | disposable plates and use disposable utensils. There is a separate prep area for religious diets with all separate utensils.                                 |
| A supervisor at the command level must approve a detainee's removal from the Common-Fare Program.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The Chaplain approves request from detainees for a religious diet. With the approval of the OIC the Chaplain can remove a detainee from the program as well. |
| The Warden, in conjunction with the chaplain and/or local religious leaders, provides the FSA a schedule of the ceremonial meals for the following calendar year.  | <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"> <li>• Muslims fasting during Ramadan receive their meals after sundown.</li> <li>• 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.</li> <li>• Main-line offerings include one meatless meal (lunch or dinner) on Ash Wednesday and Fridays during Lent.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The common fare menu accommodates detainees.   |
| The food service program addresses medical diets.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The food service department provides medical diets when prescribed by the medical staff.   |
| Satellite-feeding programs follow guidelines for proper sanitation.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The guidelines for proper satellite feeding are followed and they have a good program.   |
| Hot and cold foods are maintained at the prescribed, "safe" temperature(s) while being served.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Temperatures are taken on all foods and are maintained as prescribed and logged on the log book. Cold foods are 40 or below and hot foods are 140 or above.  |
| All meals are provided in nutritionally adequate portions.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | All foods are nutritionally adequate and the portions are adequate as well.  |
| Food is not used to punish or reward detainees based upon behavior.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | No foods are used to reward or as punishment.  |
| <p>The food service staff instructs detainee volunteers on:</p> <ul style="list-style-type: none"> <li>• Personal cleanliness and hygiene;</li> <li>• Sanitary techniques for preparing, storing, and serving food; and</li> <li>• The sanitary operation, care, and maintenance of equipment.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | All procedures are followed as outlined in the ICE Standards for Food Service.   |
| Everyone working in the food service department complies with food safety and sanitation requirements.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | All persons working within the food service department complies with food and safety requirements.   |

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**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   | Y                                   | N                        | NA                       | REMARKS   |
|--|-------------------------------------|--------------------------|--------------------------|---|
| Standard operating procedures include weekly inspections of all food service areas, including dining and food-preparation areas and equipment.<br>• Who conducts the inspections?      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The FSA conducts a weekly inspection of all areas and the kitchen supervisor initials off when any discrepancies have been corrected.       |
| Equipment is inspected for compliance with health and safety codes and regulations.<br>• When was the most recent inspection?<br>• Which agency conducted the inspection?              | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Reports of discrepancies are forwarded to the Warden or designated department head, 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 after each meal.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Food service does take temperatures and log them on a temperature log which is kept on file in the FSA's office.                            |
| Staff documents the results of every refrigerator/freezer temperature check.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The cleaning schedule for each food service area is conspicuously posted.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Cleaning schedules were posted in all areas within the kitchen and followed to ensure the cleanliness of all areas of the kitchen.          |
| Procedures include inspecting all incoming food shipments for damage, contamination, and pest infestation.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | All incoming supplies are inspected by the food service staff for damage, contamination and pest infestation prior to storing the supplies. |
| Storage areas are locked when not in use.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The storage areas are secured when not in use.  |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b> |                                     |                          |                          |   |

**REMARKS:**

The knife cabinet is in an approved cabinet with an approved locking device. However, all the food service staff has a key to the knife cabinet. It is recommended that the knife cabinet key be removed from all key rings so that only the cook supervisor in charge of the kitchen has the control of all knives and tools being issued.

b6, b7c / June 19, 2008

**AUDITOR'S 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.

**STANDARD NA: (IGSA ONLY) CHECK THIS BOX IF ALL ICE DETAINEE FUNDS, VALUABLES AND PROPERTY ARE HANDLED ONLY BY THE ICE FIELD OFFICE OR SUB-OFFICE IN CONTROL OF THE DETAINEE CASE.**

| COMPONENTS  | YES                                 | NO                       | NA                       | REMARKS  |
|---|-------------------------------------|--------------------------|--------------------------|--|
| Detainee funds and valuables are properly separated, stored, and are accessible only by designated supervisor(s).     | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Funds and valuables are properly separated and stored.         |
| 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"/> | Detainees large valuables are secured at the facility which is |

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**FUNDS AND PERSONAL PROPERTY**

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**STANDARD NA: (IGSA ONLY) CHECK THIS BOX IF ALL ICE DETAINEE FUNDS, VALUABLES AND PROPERTY ARE HANDLED ONLY BY THE ICE FIELD OFFICE OR SUB-OFFICE IN CONTROL OF THE DETAINEE CASE.**

|  |                                     |                          |                          |   |
|--|-------------------------------------|--------------------------|--------------------------|---|
|  |                                     |                          |                          | accessible by designated supervisors and/or processing staff.   |
| 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"/> | Proper inventory standards are followed.  |
| Staff forwards an arriving detainee's medication to the medical staff.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | When a detainee arrives at this facility his medication is given to the medical department at the facility.   |
| Audits of baggage and non-valuable property occur each quarter and audits are logged and verified.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Two officers are present during the processing of detainee funds and valuables during in-processing to the facility. Both officers verify funds and valuables.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | There is always two staff present when processing any detainees in and both staff verify funds and valuables. |
| Staff searches arriving detainees and their personal property for contraband.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Detainees and their property are searched as required.  |
| Staff procedures follow written policy for returning forgotten property to detainees.  | <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"/> |   |
| Staff follows written procedures when returning property to detainees.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Staff follow written procedures when returning property to the detainees.                                     |
| 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"/> | All procedures are followed by all staff when handling detainees property.                                    |
| The facility attempts to notify an out-processed detainee that he/she left property in the facility: <ul style="list-style-type: none"> <li>By sending written notice to the detainee's last known address;</li> <li>Via certified mail; and</li> <li>The notice state that the detainee has 30 days in which to claim the property, after which it will be considered abandoned.</li> </ul> | <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"> <li>If a CDF/IGSA facility, written procedure requires the prompt forwarding of abandoned property to ICE.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |

**ACCEPTABLE**
     
  **DEFICIENT**
     
  **AT-RISK**
     
  **REPEAT FINDING**

**REMARKS**

The detention center maintains accurate records for personal property and personal funds. Detainee property is accurately inventoried and stored according to policy. The work area in which these functions are performed is very neat, well organized and cleanliness is a high priority.

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**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.

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| COMPONENTS  | Y                                   | N                        | NA                                  | REMARKS   |
|---|-------------------------------------|--------------------------|-------------------------------------|---|
| Written procedures provide for the informal resolution of oral grievances (Not mandatory). <ul style="list-style-type: none"> <li>If yes, the detainee has up to five days within which to make his/her concern known to a member of the staff.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Local policy, Grievance Procedure, describes all procedures associated with the grievance procedures. |
| Detainees have access to the grievance committee (or equivalent in IGSA), using formal procedures. <ul style="list-style-type: none"> <li>Detainees may seek help from other detainees or facility staff when preparing a grievance.</li> <li>Illiterate, disabled, or non-English-speaking detainees receive special assistance when necessary.</li> </ul> | <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"/>            |   |
| There are documented or substantiated cases of staff harassing, disciplining, penalizing, or otherwise retaliating against a detainee who lodged a complaint: <ul style="list-style-type: none"> <li>If yes, explain.</li> </ul>  | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | There are no documented or substantiated cases.   |
| Procedures include maintaining a Detainee Grievance Log. <ul style="list-style-type: none"> <li>If not, an alternative acceptable record keeping system is maintained.</li> <li>"Nuisance complaints" are identified in the records.</li> <li>For quality control purposes, staff document nuisance complaints received but not filed.</li> </ul>           | <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"/>            |   |
| <input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING  |                                     |                          |                                     |   |

**REMARKS:**

Well documented and maintained program. All steps in the process are meeting the expected time frames. The grievance process and procedures are in place and detainees are being provided the necessary requirements to voice their concerns. Inspection of the log and monthly reports did not identify any lodged complaints of staff misconduct incidents that would require further investigation.

b6, b7c

/June 19, 2008

AUDITOR'S 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 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Local Policy titled, Issuance, |

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**ISSUANCE AND EXCHANGE OF CLOTHING, BEDDING, AND TOWELS**

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| COMPONENTS   | YES                                 | NO                       | NA                       | REMARKS  |
|--|-------------------------------------|--------------------------|--------------------------|--|
| exchange of clothing, bedding, linens, and towels. <ul style="list-style-type: none"> <li>The supply of these items exceeds the minimum required for the number of detainees.</li> </ul>   |                                     |                          |                          | and Exchange of Clothing, Bedding, Linen, and Towels outlines all requirements of this standard. |
| All new detainees are issued clean, temperature-appropriate, presentable clothing during in-processing. Detainees receive: <ul style="list-style-type: none"> <li>One uniform shirt and one pair of uniform pants, or one jumpsuit;</li> <li>One pair of socks;</li> <li>One pair of underwear (Daily change); and</li> <li>One pair of facility-issued footwear.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Additional clothing is available for changing weather conditions, or as seasonally appropriate.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| New detainees are issued clean bedding, linens, and towels. They receive at a minimum: <ul style="list-style-type: none"> <li>One mattress;</li> <li>One blanket;</li> <li>Two sheets;</li> <li>One pillowcase;</li> <li>One towel; and</li> <li>Additional blankets are issued based on local weather conditions.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | There are sufficient amounts of additional clothing and bedding materials maintained.            |
| 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"> <li>Socks and undergarments - exchanged daily.</li> <li>Outer garments - twice weekly.</li> <li>Sheets - weekly.</li> <li>Towels - weekly.</li> <li>Pillowcases - weekly.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | All exchanges are in line with required standards.   |
| Food service detainee volunteer workers are permitted to exchange outer garments daily.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Volunteer detainee workers are permitted to exchange outer garments more frequently.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | As needed.   |

**ACCEPTABLE**     
  **DEFICIENT**     
  **AT-RISK**     
  **REPEAT FINDING**

**REMARKS:**

Review of policies and procedures indicate that the detainees are afforded the clothing, bedding, and linens as required by this standard. Observations of the laundry process showed that it is a very efficient and well supervised operation. Inspection of the clothing storage area found that there were sufficient amounts of supplies on hand for any emergency.

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**MARRIAGE REQUESTS**

**POLICY:** ALL DETAINEE MARRIAGE REQUESTS WILL RECEIVE CASE-BY-CASE CONSIDERATION FROM ICE MANAGEMENT.

| COMPONENTS   | Y                                   | N                        | NA                       | REMARKS  |
|--|-------------------------------------|--------------------------|--------------------------|--|
| The Field Office considers detainee marriage requests on a case-by-case basis.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Documentation is on file for detainees marriage request. |
| The Field Office Director reviews every marriage request rejected by a Warden/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"/> | Review of files show that all are in compliance.         |
| 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 Warden/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"/> | Copies are on file in the OIC.                           |
| When permission is denied, the Warden/OIC states the basis for his/her decision.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The Warden/OIC provides the detainee with a place and time to make wedding arrangements.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b> |                                     |                          |                          |  |

**REMARKS:**

This facility has a sound program in regards to marriage request. The proper documentation is on file and completed according to standards.

b6, b7c / June 19, 2008

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**NON-MEDICAL EMERGENCY ESCORTED TRIPS**

**POLICY:** THE IMMIGRATION AND CUSTOMS ENFORCEMENT (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.

**STANDARD N/A:** CHECK THIS BOX IF ALL ICE NON-MEDICAL EMERGENCY ESCORTED TRIPS ARE HANDLED ONLY BY THE ICE FIELD OFFICE OR SUB-OFFICE IN CONTROL OF THE DETAINEE CASE.

| COMPONENTS   | YES                                 | NO                                  | NA                                  | REMARKS   |
|--|-------------------------------------|-------------------------------------|-------------------------------------|---|
| The Field Office Director considers and approves, on a case-by-case basis, trips to an immediate family member's: <ul style="list-style-type: none"> <li>• Funeral; or</li> <li>• Deathbed</li> </ul>  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | The AFOD has been delegated by the FOD to approve all non-medical escorted trips for detainees confined at the El Centro Service Processing Center. |
| The facility recognizes mother, father, brother, sister, spouse, child, step-parent, 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"/> | Not applicable to ECSPC.  |
| 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"/>            |   |
| Each escort includes at least two officers.  | <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 increase or decrease minimum restraints in accordance with written procedures and classification level of the detainee.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |   |
| Escort officers are precluded from accepting gifts/gratuities from a detainee, or detainee's relative or friend for any reason.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            |   |
| Escort officers ensure that detainees: <ul style="list-style-type: none"> <li>• Conduct themselves in a manner that does not bring discredit to the ICE;</li> <li>• Do not violate federal, state, or local laws;</li> <li>• Do not purchase, possess, use, consume, or administer narcotics, other drugs, or intoxicants;</li> <li>• Make no unauthorized phone calls; and</li> <li>• Know they are subject to search, urinalysis, breathalyzer, or comparable test upon return.</li> </ul> | <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"/>            |   |

**ACCEPTABLE**    
  **DEFICIENT**    
  **AT-RISK**    
  **REPEAT FINDING**

**REMARKS:**

The AFOD has been delegated by the FOD to approve all non-medical escorted trips for detainees confined at the El Centro Service Processing Center. Appropriate post orders and instructions are available for escort staff.

b6, b7c

/ June 19, 2008

**AUDITOR'S SIGNATURE / DATE**

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**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   | Y                                   | N                        | NA                       | REMARKS  |
|--|-------------------------------------|--------------------------|--------------------------|--|
| The facility has a recreation program and facility.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | This facility has a good recreation program run by Two recreation staff.                                 |
| A recreational specialist (for facilities with more than 350 detainees) tailors the program activities and offerings to the detainee population.                                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Regular maintenance keeps recreational facilities and equipment in good condition.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The recreational specialist or trained equivalent supervises detainee recreation workers.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The recreational inmate workers are supervised by recreation staff.                                      |
| The recreational specialist or trainee equivalent oversees recreation programs for special housing units (SHU) 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"/> | There are board games, card games, as well as television offered in the dayrooms.                        |
| 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 check all items for damage and report damages to the recreation staff for repairs or replacements. |
| Staff conducts searches of recreation areas before and after use.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Searches are conducted before and after recreation times.  |
| 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 SHU at least one hour of outdoor recreation time daily, five times per week.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Detainees in disciplinary/administrative segregation receive a written explanation when a panel revokes his/her recreation privileges.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Special programs or religious activities are available to detainees.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 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"/> |  |
| <b><input checked="" type="checkbox"/> If outdoor recreation is offered, check this box. No further information is required when outdoor recreation is offered.</b>                |                                     |                          |                          |  |
| If the facility has no outside recreation, are detainees considered for transfer after six months?<br>• If yes, written procedures ensure timely review of all eligible detainees. | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Case officers make written transfer recommendations about every six-month detainee to the OIC.   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The OIC documents all detainee-transfer decisions, whether yes or no.  | <input type="checkbox"/>            | <input type="checkbox"/> | <input 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 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 type="checkbox"/> |  |
| If no recreation is available, the ICE Districts routinely review transfer eligibility for all detainees after 60 days.  | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The A-file of every detainee who is held more than 60 days without access to recreation contains either a transfer-waiver signed by the  | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |  |

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**RECREATION**

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detainee, or the OIC's written determination of the detainee's ineligibility for transfer.

The detainee's legal representative is notified of the detainee's/OIC's decision.

|                          |                          |                          |  |
|--------------------------|--------------------------|--------------------------|--|
|                          |                          |                          |  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |

**ACCEPTABLE**       **DEFICIENT**       **AT-RISK**       **REPEAT FINDING**

**REMARKS:**

The facility provides 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. Indoor and outdoor recreation schedules allow detainee access to recreation a minimum of one hour daily, five days a week.

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/ June 19, 2008

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**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   | Y                                   | N                        | NA                       | REMARKS   |
|--|-------------------------------------|--------------------------|--------------------------|---|
| Detainees are allowed to engage in religious services.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | A variety of religious services are provided.   |
| Space is available for detainees to conduct religious services.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The facility allows detainees to observe the major "holy days" of their religious faith.<br>• List any exceptions.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The facility accommodates recognized holy-day observances by:<br>• Providing special meals, consistent with dietary restrictions;<br>• Honoring fasting requirements;<br>• Facilitating religious services; and<br>• Allowing activity restrictions. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | If a detainee wishes to observe their religious holy-day they need only put in a request to the Chaplain. |
| 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 allowing participation in detainee programs.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Volunteer credentials are verified including NCIC checks.   |
| Members of faiths not represented by clergy may conduct their own services within security allowances.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Detainees in the Special Management Unit are allowed 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"/> | Chaplain conduct rounds to provide ministry to the Special Management Unit.                               |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b>   |                                     |                          |                          |   |

**REMARKS:**

The facility provides detainees of all faiths with reasonable and equitable opportunities to participate in the practice of their faith, limited only by the constraints of safety, security, the orderly operations of the facility and budgetary constraints.

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**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.

CHECK HERE IF ICE DETAINEES ARE NOT AUTHORIZED TO WORK AT THE IGSA FACILITY. MARK NA ON FORM G-324A, PAGE 3 AND MOVE TO NEXT SECTION.

| COMPONENTS  | Y                                   | N                        | NA                       | REMARKS   |
|---|-------------------------------------|--------------------------|--------------------------|---|
| Does the facility have a voluntary work program?<br>• Do ICE detainees participate?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Detainees participate in the facilities voluntary work program.   |
| Detainee housekeeping meets neatness and cleanliness standards.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Housing Units were neat and clean.  |
| 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.  | <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:<br>• Eight hours a day and 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"/> |   |
| 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Job orientations are completed upon entering the voluntary work program.                                |
| The voluntary work program meets:<br>• OSHA, NFPA, ACA standards  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Medical staff screen and formally certify detainee food service volunteers.<br>• Before the assignment begins; and<br>• As a matter of written procedure      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Detainees must be cleared for work by medical prior to being considered for the voluntary work program. |
| Detainees receive safety equipment/ training sufficient for the assignment.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Proper procedure is followed when an ICE detainee is injured on the job.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| <input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING    |                                     |                          |                          |   |

**REMARKS**

The facility offers a voluntary work program that allows the detainees the opportunity to work and earn money for participating. Detainees are medically cleared and properly placed into employment opportunities. Documentation of job training and medical screening are appropriately filed.

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**SECTION III.**  
**HEALTH SERVICES STANDARDS**

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## HUNGER STRIKES

**POLICY:** ALL FACILITIES WILL FOLLOW STANDARD GUIDELINES FOR THE MEDICAL AND ADMINISTRATIVE MANAGEMENT OF ICE DETAINEES ENGAGING IN HUNGER STRIKES. BY MONITORING OF THE HEALTH AND WELFARE OF THE INDIVIDUAL DETAINEES, FACILITIES WILL STRIVE TO SUSTAIN THEIR LIVES.

| COMPONENTS  | Y                                   | N                        | 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.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Reporting procedures are outlined in Local Operating Procedure, LOP 811, "Hunger Strike Protocol" dated 11/05. LOP manual is reviewed annually for appropriateness. |
| CDFs and IGSA's immediately report a hunger strike to the ICE.  | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | This is an ICE facility. Hunger strike is an event identified in the DIHS-USPHS Standard Operating Procedure, DIHS SOP 310, and "Required Notifications to ICE".    |
| The facility has established procedures to ensure staff respond immediately to a hunger strike.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Staff response is outlined in LOP 811.  |
| Policy and procedure require that staff isolate a hunger-striking detainee from other detainees. <ul style="list-style-type: none"> <li>• If yes, in an observation room?</li> </ul>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | There are four designated cells in the medical infirmary for housing a detainee who declares hunger strike.   |
| Medical personnel are authorized to place a detainee in the Special Management Unit or a locked hospital room.  | <input checked="" type="checkbox"/> | <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.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Monitoring is addressed in LOP 811, section C, "Medical Monitoring."  |
| The OIC of the facility obtains a hunger striker's consent before medical treatment.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Obtaining informed consent for medical treatment is outlined in LOP 811, section E, "On Site Treatment".  |
| A signed Refusal of Treatment form is required of every detainee who rejects medical evaluation or treatment.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Refusal for treatment is documented on DIHS Form 820.   |
| During a hunger strike, staff document and provide the hunger-striking detainee three meals a day.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |   |
| Staff maintains the hunger striker's supply of drinking water/other beverages.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |   |
| During a hunger strike, staff removes all food items from the hunger striker's living area.   | <input checked="" type="checkbox"/> | <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 or similar IGSA form.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | DIHS Form I-839 is used in this facility to document food and fluid intake of a hunger striker.   |
| The medical staff has written procedures for treating hunger strikers.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Medical intervention is outlined in LOP 811, sections E and F, "On Site Treatment" and "Involuntary Treatment."   |
| Staff documents all treatment attempts, including attempts to persuade hunger striker of medical risks.   | <input checked="" type="checkbox"/> | <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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Hunger strike training is a mandatory topic during initial and annual refresher courses for all SPC, medical and non-medical staff, including the                   |

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**HUNGER STRIKES**

**POLICY:** ALL FACILITIES WILL FOLLOW STANDARD GUIDELINES FOR THE MEDICAL AND ADMINISTRATIVE MANAGEMENT OF ICE DETAINEES ENGAGING IN HUNGER STRIKES. BY MONITORING OF THE HEALTH AND WELFARE OF THE INDIVIDUAL DETAINEES, FACILITIES WILL STRIVE TO SUSTAIN THEIR LIVES.

|   |   |   |  |  |
|---|---|---|--|--|
|   |   |   |  | contract AKAL security service staff. Review of the initial and annual refresher training logs reflects training was provided. |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> | <input type="checkbox"/> <b>DEFICIENT</b> | <input type="checkbox"/> <b>AT-RISK</b> | <input type="checkbox"/> <b>REPEAT FINDING</b> |  |

**REMARKS:**

Medical services are provided to ICE by the Division of Immigration Health Services, U.S. Public Health Services (DIHS - USPHS). DIHS- USPHS Standard Operating Procedure, revised October 29, 2007 and Local Operating Procedure dated April 2006 have procedures outlining staff response and responsibility when a detainee declares a hunger strike.

Hunger strike is an event identified in the DIHS-USPHS Standard Operating Procedure, SOP 310, and "Required Notifications to ICE". El Centro SPC has a standard operating procedure on hunger strikes, dated April 8, 2008. Hunger strike is a mandatory training topic for all ECSPC staff, medical staff, and contract security staff for the AKAL company. Training is conducted by the medical staff during initial and annual refresher training sessions. Review of the topic outline and power point presentation reflects full compliance with this standard.

b6, b7c / June 19, 2008  
**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 ICE DETAINEES.

| COMPONENTS  | Y                                   | N                        | NA                       | REMARKS   |
|---|-------------------------------------|--------------------------|--------------------------|---|
| Facilities operate a health care facility in compliance with state and local laws and guidelines.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The facility has current JCAHO (September 2006), NCCHC (July 2006) and ACA (July 2006) accreditations.  |
| The facility's in-processing procedures for arriving detainees include medical screening.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Intake medical screening is outlined in Local Operating Procedure, LOP 802, "Medical Intake Screening Process."   |
| All detainees have access to and receive medical care.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Access to medical care is outlined in the Inmate Handbook, and in LOP 218, "Access to Medical Care." Interview with the nursing staff indicates access to medical care is discussed during the initial intake screening process.  |
| The facility has access to a PHS/DIHS Managed Health Care Coordinator.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Review of outside medical referral log reflects appropriate and timely scheduling for specialized services not available in the facility. The log reviewed was for calendar year 06/2007 - 06/2008. There were 54 referrals for the review dates. 50 of 54 detainees were sent for the outside referrals appointments within a week after approval by DIHS headquarters. 4 of the 54 outside referrals were completed within 30-45 days due to inability to find a local provider; these 4 specialty referrals were sent to a San Diego consultant. |
| The medical staff is large enough to provide, examine, and treat the facility's detainee population.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | There are 6 vacancies (4 nursing, 1 pharmacy technician, and 1 mental health social worker). Interview with the HSA and the Clinical Director indicates current nursing staffing is adjusted to cover peak hours and evening shifts to meet the medical mission. The HSA and AHSA are registered nurses who performs clinical duties as needed during the business hours from 0700-1500.  |
| The facility has sufficient space and equipment to afford detainee privacy when receiving health care.                                      | <input checked="" type="checkbox"/> | <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. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |

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**ACCESS TO MEDICAL CARE**

**POLICY:** EVERY FACILITY WILL ESTABLISH AND MAINTAIN AN ACCREDITED/ACCREDITATION-WORTHY HEALTH PROGRAM FOR THE GENERAL WELL-BEING OF ICE DETAINEES.

|  |                                     |                          |                          |  |
|--|-------------------------------------|--------------------------|--------------------------|--|
| The medical facility entrance includes a holding/waiting room.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The medical facility's holding/waiting room is under the direct supervision of custodial staff.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | There is two custodial staff assigned to the medical unit at all times.  |
| Detainees in the holding/waiting room have access to a drinking fountain.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Medical records are kept apart from other files. They are: <ul style="list-style-type: none"> <li>Secured in a locked area within the medical unit;</li> <li>With physical access restricted to authorized medical staff; and</li> <li>Procedurally, no copies made and placed in detainee files.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The facility has electronic medical records which are accessible only by the medical staff.  |
| Pharmaceuticals are stored in a secure area.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Medical screening includes a Tuberculosis (TB) test. <ul style="list-style-type: none"> <li>Every arriving detainee receives a TB test during the admission process;</li> <li>Detainee's TB-screening does not occur more than one business day after his/her arrival at the facility; and</li> <li>Detainees not screened are housed separate from the general population.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Tuberculosis surveillance is outlined in LOP 8.30, "Tuberculosis Prevention, Treatment, and Control." All detainees are screened for signs and symptoms of active TB on admission during intake screening. On arrival, chest x-rays are performed on all detainees who do not have a current negative chest x-ray report on their transfer documents. 100 of 100 records reviewed reflected full compliance with the policy. |
| All detainees receive a mental-health screening upon arrival. It is conducted: <ul style="list-style-type: none"> <li>By a health care provider or specially trained officer; and</li> <li>Before a detainee's assignment to a housing unit.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Mental Health Screening is conducted by the nursing staff on arrival. 100 of 100 records reflects all detainees received mental health intake screening on admission.  |
| The facility health care provider promptly reviews all I-794s (or equivalent) to identify detainees needing medical attention.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | All medical transfer records are reviewed by the nursing staff during intake screening and referred to the appropriate provider as needed.   |
| The health care provider physically examines/assesses arriving detainees within 14 days of admission/arrival at the facility.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 100 of 100 records reviewed reflect physical assessments are conducted by the midlevel practitioners within 3 to 12 days of arrival.   |
| Detainees in the Special Management Unit have access to health care services.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Sick call slips are available in the Special Management unit (SMU) and collected daily by the nursing staff. Requests are prioritized for appointments with the midlevel provider(s).  |
| Staff provides detainees with health services (sick call) request slips daily, upon request. <ul style="list-style-type: none"> <li>Request slips are available in languages other than English, including every language spoken by a sizeable number of the facility's detainee population.</li> <li>Service-request slips are delivered in a timely fashion to the</li> </ul>        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Sick call request forms in English and Spanish are available in all housing units and collected daily by the nursing staff.  |

**ACCESS TO MEDICAL CARE**

**POLICY:** EVERY FACILITY WILL ESTABLISH AND MAINTAIN AN ACCREDITED/ACCREDITATION-WORTHY HEALTH PROGRAM FOR THE GENERAL WELL-BEING OF ICE DETAINEES.

|   |                                     |                          |                                     |   |
|---|-------------------------------------|--------------------------|-------------------------------------|---|
| health care provider.   |                                     |                          |                                     |   |
| 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. | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | There is 24-hour nursing coverage. A midlevel practitioner on-call during non-business hours, 7 days per week.  |
| The plan includes an on-call provider.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | DIHS SOP 3.18.1, "After-Hours Medical Coverage" identifies the midlevel provider as first call and the clinical director as second call. Interview with the clinical director indicates he is on available for telephonic consultation 24 hours per day, 7 days per week. |
| The plan includes a list of telephone numbers for local ambulance and hospital services.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |   |
| The plan includes procedures for facility staff to utilize this emergency health care consistent with security and safety.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |   |
| Detention staff is trained to respond to health-related emergencies within a 4-minute response time.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | All SPC, medical and contract AKAL security staff have current CPR certifications on record.  |
| Where staff is used to distribute medication, a health care provider properly trains these officers.  | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Medications are distributed by the nursing staff.   |
| The medical unit keeps written records of medication that is distributed.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |   |
| The Form I-819 (or IGSA equivalent) is used to notify the Warden/Facility of a detainee that has special medical needs.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Procedures and appropriate notification regarding detainees with special needs are addressed in the DIHS SOP 8.20, "Detainee Special Needs".  |
| A signed and dated consent form is obtained from a detainee before medical treatment is administered.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Informed consent is outlined in DIHS SOP 2.1, Prerequisites for Treatment, section 2.1.1, "Informed Consent".   |
| Detainees use the I-813 (or IGSA equivalent) to authorize the release of confidential medical records to outside sources.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |   |
| The facility health care provider is given advance notice prior to the release, transfer, or removal of a detainee.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |   |
| Detainee's medical records or a copy thereof, are available and transferred with the detainee.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | The In-Transit form is used to indicate the detainee's pertinent history and medical needs during transfer.   |
| Medical records are placed in a sealed envelope or other container labeled with the detainee's name and A-number and marked "MEDICAL CONFIDENTIAL".   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |   |

**ACCEPTABLE**     
  **DEFICIENT**     
  **AT-RISK**     
  **REPEAT FINDING**

**REMARKS:**

El Centro Service Processing Center (ECSPC) has current accreditations by the Joint Commission on the Accreditation of Health Care Organizations (JCAHO) dated September 2006; by the National Commission on Correctional Health Care (NCCHC) dated July 2006; and by the Commission on Accreditation for Corrections and the American Correctional Association (ACA) dated July 2006. Medical

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Services are provided by the Division of Immigration Health Services U.S. Public Health Services (DHIS - USPHS). DIHS-USPHS Standard Operating Procedure (DIHS SOP) Manual dated October 29, 2007 has current revisions and annual review documentation. The Local Operating Procedures manual has current revision dated April 2006 with current annual review documentation.

Interview with the Health Services Administrator (HSA) indicates the medical unit is authorized for 30 staff positions. Current staffing has six vacancies: four nursing staff, one pharmacy technician, and one mental health social worker. There are three registered nurses (RNs) scheduled for interviews on June 20, 2008. One nursing position has been filled with a licensed vocational nurse (LVN) who will report for duty on June 30, 2008. Interview with the HSA, indicated current staffing is adjusted to cover peak hours to meet the medical mission. The HSA and the Assistant HSA are RNs and performs clinical nursing duties during business hours as needed. Current staffing consists of 24 full time staff: one Clinical/Medical Director, one HSA, one Assistant HSA, one nurse practitioner, two physician assistants - certified (PACs), seven RNs, five LVNs, two medical records technicians (MRTs), one dentist, one dental assistant, one pharmacist and one administrative assistant. The unit is authorized to hire three part time staff for peak time coverage (one PAC, one RN, and one MRT) until staffing is at full complement. There is a contract psychologist (eight hours per week) and a psychiatrist (eight hours every two weeks).

Interview with the contract psychiatrist indicated the mental health program is adequate and he is able to conduct monthly mental health chronic care monitoring of the 20 detainees on mental health chronic care clinic. The psychiatrist indicated he is available for telephonic consultation at any time seven days for detainees on psychotropic medications or with history of mental illness. The clinical director makes adjustments of psychotropic medications as needed with consultation with the psychiatrist. There are currently 154 detainees on medical chronic care clinics and review of 50 records indicate 50 of 50 detainees on chronic care are seen at least monthly or sooner, as scheduled by the midlevel provider.

There is 24-hour nursing coverage and all detainees report to the medical clinic for scheduled medications/pill line except those housed in the Special Management Unit (SMU). The nursing staff delivers medications at SMU and collects sick call slips daily. Intake medical and mental health screening is conducted by the nursing staff on admission. All 100 records reviewed reflected medical and mental health screening were conducted on admission. The detainee is instructed on procedures to access medical care including the use of the sick call request slips. Sick call request forms are available in English and Spanish. Tuberculosis (TB) screening is performed using chest x-rays. All detainees are screened for signs and symptoms of active TB on admission during intake screening. Chest x-rays are performed on all detainees who do not have a current negative chest x-ray reports on their transfer documents. All 100 records reviewed reflected TB screening policy was followed. A review of 100 records reflected the physical examinations were completed by the midlevel practitioner within 3 to 12 days of admission.

The referral to outside specialty services log was reviewed for the calendar period of June 2007 to June 2008. There were 54 outside referrals. DIHS notifications to headquarter were done within 1-2 days of the noted order from the practitioner. DIHS approval was received within 1-2 days of the request. Of the 54, four detainees were sent for the outside specialist appointments within a week after approval by DIHS headquarters. Four of the 54 outside referrals were completed within 45 days due to the inability to find a local provider and the availability of appointment at the specialists' office. The four specialty referrals were sent to a San Diego consultant.

All SPC, medical and contract AKAL security staff have current CPR certifications at the time of this review.

b6, b7c

/ June 19, 2008

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### SUICIDE PREVENTION AND INTERVENTION

**POLICY:** ALL DETENTION STAFF WORKING WITH ICE 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  | Y                                   | N                        | NA                       | REMARKS  |
|---|-------------------------------------|--------------------------|--------------------------|--|
| Every new staff member receives suicide-prevention training. Suicide-prevention training occurs during the employee orientation program.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Suicide prevention training is mandatory for all SPC, medical and contract AKAL security service staff. The training is reflected in the attendance records of the initial and annual refresher training sessions. |
| Training prepares staff to: <ul style="list-style-type: none"> <li>• Recognize potentially suicidal behavior;</li> <li>• Refer potentially suicidal detainees, following facility procedures; and</li> <li>• Understand and apply suicide-prevention techniques.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The training topic outline on suicide prevention was reviewed and meets the requirement of this standard.  |
| 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"> <li>• Screening does not occur later than one working day after the detainee's arrival.</li> </ul>     | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 100 of 100 (100/100) records reviewed reflects mental health screening is conducted by the nursing staff on arrival.   |
| Written procedures cover when and how to refer at-risk detainees to medical staff and procedures are followed.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Referral procedures are outlined in LOP 1703 "Suicide Prevention Program."   |
| The facility has a designated isolation room for evaluation and treatment.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | There is a designated isolation cell in the medical unit to be used for housing the detainee on suicide watch.   |
| The designated isolation room does not contain any structures or smaller items that could be used in a suicide attempt.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Medical staff has approved the room for this purpose.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Staff observes and documents the status of a suicide-watch detainee at least once every 15 minutes.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Monitoring of a detainee requiring constant observation is outlined in LOP 1703.   |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b>  |                                     |                          |                          |  |

**REMARKS:**

All ECSPC, medical and contract AKAL security staff receive mandatory suicide prevention training at initial and annual refresher sessions. The training is conducted by the PHS medical staff. Three records of detainees who were previously on suicide watch reflected the suicide policy procedures were followed. An interview with the contract psychiatrist reflected he has read the suicide prevention program and the procedures are adequate and in accordance to community mental health standards for suicide prevention, monitoring and treatment.

b6, b7c

/ June 19, 2008

**AUDITOR'S SIGNATURE / DATE**

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## TERMINAL ILLNESS, ADVANCED DIRECTIVES, AND DEATH

**POLICY** ALL FACILITIES HOUSING ICE 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 ICE 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.

CHECK THIS BOX IF THE FACILITY DOES NOT ACCEPT ICE DETAINEES WHO ARE SEVERELY OR TERMINALLY ILL. INDICATE NA IN THE APPROPRIATE BOX FOR THIS PORTION OF THE WORKSHEET. ALWAYS COMPLETE ALL REFERENCES TO DETAINEE DEATH AND RELATED NOTIFICATIONS.

| COMPONENTS   | Y                                   | N                        | NA                                  | REMARKS   |
|--|-------------------------------------|--------------------------|-------------------------------------|---|
| Detainees who are chronically or terminally ill are transferred to an appropriate offsite medical facility.  | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | ECSPC has the capability of providing supportive care for the detainee with serious/terminal illness. Only those detainees requiring invasive monitoring or specialty-based medical treatment beyond the capability of the facility will be transferred to the local hospital as outlined by LOP 801, General Medical Care, and section on "Scope of Medical Services." |
| The facility or appropriate ICE office promptly notifies the next of kin of the detainee's medical condition, to include: <ul style="list-style-type: none"> <li>• The detainee's location; and</li> <li>• The limitations placed on visiting.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Notification of the next of kin by ICE is outlined in ECSPC SOP "Terminal Illness, Advance Directives, and Death" dated March 24, 2008. DIHS SOP 2.4, "Notification of Next of Kin and Local Authorities" addresses USPHS procedure of notifying the Assistant Field Office Director (AFOD).  |
| There are guidelines addressing the State Advanced Directive Form for Implementing Living Wills and Advanced Directives. <ul style="list-style-type: none"> <li>• The guidelines include instructions for detainees who wish to have a living will other than the generic form the DIHS provides or who wishes to appoint another to make advance decisions for him or her.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Outlined in the ECSPC SOP, section B, "Living Wills" and in the DIHS SOP 2.6.0 "Advanced Directives".   |
| The guidelines provide the detainee the opportunity to have a private attorney prepare the documents.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Outlined in DIHS SOP 2.6.1 "Living Wills."  |
| There is a policy addressing "Do Not Resuscitate Orders"   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Do Not Resuscitate (DNR) procedures are addressed in the ECSPC SOP, section C and in the DIHS SOP 2.6.2 "Obtaining Do Not Resuscitate."   |
| Detainees with a "Do Not Resuscitate" order in the medical record receive maximal therapeutic efforts short of resuscitation?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Supportive medical care of the detainee with terminal/serious illness is within the scope services outlined in LOP 801, "Scope of Medical Services."  |
| 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 ICE representative.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Outlined in DIHS SOP 3.10, "Required Notifications."  |

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**TERMINAL ILLNESS, ADVANCED DIRECTIVES, AND DEATH**

**POLICY** ALL FACILITIES HOUSING ICE 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 ICE 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.

CHECK THIS BOX IF THE FACILITY DOES NOT ACCEPT ICE DETAINEES WHO ARE SEVERELY OR TERMINALLY ILL. INDICATE NA IN THE APPROPRIATE BOX FOR THIS PORTION OF THE WORKSHEET. ALWAYS COMPLETE ALL REFERENCES TO DETAINEE DEATH AND RELATED NOTIFICATIONS.

| COMPONENTS   | Y                                   | N                        | NA                       | REMARKS  |
|--|-------------------------------------|--------------------------|--------------------------|--|
| The facility has written procedures to address the issues of organ donation by detainees.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Outlined in ECSPC SOP, section D and in the DIHS SOP 2.6.4, "Organ Donation."  |
| The facility has written procedures to notify ICE officials, deceased family members and consulates, when a detainee dies while in Service.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Death is a reportable event as addressed in the DIHS SOP 3.10 "Required Notifications." ECSPC SOP, section E, "Death Occurring in ICE Custody" addresses the facility's notification procedures. |
| The facility has a policy and procedure to address the death of a detainee while in transport.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| At all ICE locations the detainee's remains disposed of in accordance with the provisions detailed in this standard.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ECSPC SOP section G addresses procedures regarding disposition of remains.   |
| In the event that neither family nor consulate claims the remains, the Field Office schedules an indigent's burial, consistent with local procedures. <ul style="list-style-type: none"> <li>If the detainee's is a U.S. military veteran, is the Department of Veterans Affairs notified?</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| An original or certified copy of a detainee's death certificate is placed in the subject's a-file.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Outlined in ECSPC SOP, section I, "Death Certificate".   |
| The facility follows established policy and procedures describing when to contact the local coroner regarding such issues as: <ul style="list-style-type: none"> <li>Performance of an autopsy;</li> <li>Who will perform the autopsy;</li> <li>Obtaining state approved death certificates; and</li> <li>Local transportation of the body.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Outlined in ECSPC SOP, section J, "Authority to Order Autopsies".  |
| ICE staff follows established procedures to properly close the case of a deceased detainee.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Case Closure is outlined in the ECSPC SOP, section H.  |

ACCEPTABLE     
  DEFICIENT     
  AT-RISK     
  REPEAT FINDING

**REMARKS:**

An interview with the clinical director and the health services administrator indicates the facility has the capability of providing medical supportive care to the detainee with terminal or serious illness. Any detainee whose condition has deteriorated to an acuity level requiring invasive monitoring not available at the facility or requiring specialty-based medical treatment will be reviewed by the clinical director, who will then fill out the required DIHS transfer referral form and notify the AFOD prior to transferring the detainee to the local hospital. This procedure is outlined in LOP 801, "Scope of Medical Services" and LOP 804, "Authorization for Off-Site Referral and Hospital Admission." DIHS honors the Patient Self-Determination Act of 1990, Public Law 101-508; 104 Statute 1388, which requires that health care institutions inform patients of their right to participate in and direct health care decisions by implementing, advanced directives. Detainees who wish to execute advanced directives are provided the generic State of California Advanced Directive forms or are assisted to contact his private attorney to implement living wills/advanced directive decision, as

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outlined in SOP 2.6.0 "Advanced Directives, 6.2.1 "Living Wills."

DIHS USPHS medical staff notifies the AFOD when the detainee is determined to have a serious or terminal illness or in the event of detainee death. DIHS "Required Notification(s)" to the AFOD include the detainee's wish to execute advance directive/living wills documents including a "Do Not Resuscitate (DNR) decision. ECSPC SOP "Terminal Illness, Advance Directives and Death" addresses all the facility's policy and procedures that meets the requirements of this standard.

There were no detainee death records to review during the period of the current DIHS policy revision of April 2006 to present.

b6, b7c

June 19, 2008

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## SECTION IV. SECURITY AND CONTROL

### CONTRABAND

**POLICY:** ALL DETENTION FACILITIES WILL ENSURE THE PROPER HANDLING AND DISPOSAL OF ALL CONTRABAND. DOCUMENTATION OF CONTRABAND DESTRUCTION IS REQUIRED.

| COMPONENTS  | Y                                   | N                        | NA                       | REMARKS |
|---|-------------------------------------|--------------------------|--------------------------|---------|
| The facility follows a written procedure for handling illegal contraband. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |

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**CONTRABAND**

**POLICY:** ALL DETENTION FACILITIES WILL ENSURE THE PROPER HANDLING AND DISPOSAL OF ALL CONTRABAND. DOCUMENTATION OF CONTRABAND DESTRUCTION IS REQUIRED.

| COMPONENTS   | Y                                   | N                        | NA                       | REMARKS |
|--|-------------------------------------|--------------------------|--------------------------|---------|
| Staff inventory, hold, and report it when necessary to the proper authority for action/possible seizure.   |                                     |                          |                          |         |
| 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.<br>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"/> |         |

**ACCEPTABLE**     
  **DEFICIENT**     
  **AT-RISK**     
  **REPEAT FINDING**

**REMARKS:**

All seized contraband is appropriately recorded and stored, pending disposition in the AFOD's office safe.

b6, b7c / June 19, 2008

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**DETENTION FILES**

**POLICY:** EVERY FACILITY WILL CREATE A DETENTION FILE FOR EVERY ICE 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   | Y                                   | N                        | NA                       | REMARKS  |
|--|-------------------------------------|--------------------------|--------------------------|--|
| A detention file is created for every new arrival whose stay will exceed 24 hours.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Detention files are well maintained and arranged by security level. They contain the Form I-385, DCS form, medical questionnaire, property inventory sheet, Record of Search, disciplinary records, and other pertinent documents related to the detainees stay. |
| The detainee detention file contains either originals or copies of documentation and forms generated during the admissions process.  | <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"> <li>• Special requests</li> <li>• Any G-589s and/or I-77s closed-out during the detainee's stay</li> <li>• Disciplinary forms/Segregation forms</li> <li>• Grievances, complaints, and the disposition(s) of same</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The detention files are located and maintained in a secure 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"/> | Detention files are maintained in the Intake/Release Department. The files are in a secure area.   |
| 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 properly requested by supervisory personnel at the receiving facility or office.   | <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"/> | The SDDO and Processing Officer have keys to the Detention Files. Removed files are logged out and in.   |

**ACCEPTABLE**     
 **DEFICIENT**     
 **AT-RISK**     
 **REPEAT FINDING**

**REMARKS:**

Detention files contain information as directed by policy and they are well maintained, orderly, and kept in a secure area of the facility.

b6, b7c / June 19, 2008

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**CONTRABAND**

**POLICY:** ALL DETENTION FACILITIES WILL ENSURE THE PROPER HANDLING AND DISPOSAL OF ALL CONTRABAND. DOCUMENTATION OF CONTRABAND DESTRUCTION IS REQUIRED.

| COMPONENTS   | Y                                   | N                        | NA                       | REMARKS |
|--|-------------------------------------|--------------------------|--------------------------|---------|
| The facility follows a written procedure for handling illegal contraband. Staff inventory, hold, and report 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.<br>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"/> |         |

**ACCEPTABLE**     
  **DEFICIENT**     
  **AT-RISK**     
  **REPEAT FINDING**

**REMARKS:**

All seized contraband is appropriately recorded and stored pending disposition in the AFOD's office safe.

b6, b7c / June 19, 2008  
**AUDITOR'S 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   | Y                                   | N                        | 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"/>            | Local policy, Environmental Health and Safety, dated April 17, 2008 establishes a system for the control of all hazardous materials. |
| 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"/>            | Inventories are maintained on all hazardous chemicals. The tool room officer maintains MSDS's and inventories of all materials.      |
| The manufacturer's Material Safety Data Sheet (MSDS) file is up-to-date for every hazardous substance used. <ul style="list-style-type: none"> <li>The files list all storage areas, and include a plant diagram and legend.</li> <li>The MSDSs and other information in the files are available to personnel managing the facility's safety program.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | MSDS's are maintained in all areas where hazardous materials are used.   |
| All personnel using flammable, toxic, and/or caustic substances follow the prescribed procedures. They: <ul style="list-style-type: none"> <li>Wear personal protective equipment; and</li> <li>Report hazards and spills to the designated official.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| The MSDSs are readily accessible to staff and detainees in work areas.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | MSDS's books are available.  |
| Hazardous materials are always issued under proper supervision. <ul style="list-style-type: none"> <li>Quantities are limited; and</li> <li>Staff always supervises detainees using these substances.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | The process is well supervised and only limited amounts are allowed inside the secure perimeter.                                     |
| All "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 installed in storage rooms and other hazardous areas meet National Electrical Code requirements.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| The facility has sufficient ventilation, and provides and ensures clean air exchanges throughout all buildings.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| Vents return vents, and air conditioning ducts are not blocked or obstructed in cells or anywhere in the facility.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | All vents and air conditioning ducts are checked daily and filters changed monthly.  |
| Living units are maintained at appropriate temperatures in accordance with industry standards. (68 to 74 degrees in the winter and 72 to 78 degrees in the summer.)  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| Shower and sink water temperatures do not exceed the industry standard of 120 degrees.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| All toxic and caustic materials are stored in their original containers in a secure area.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Until they are diluted and placed in marked bottles.   |
| 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"/>            |  |
| Staff directly supervise and account for products with methyl alcohol. Staff receives a list of products containing diluted methyl alcohol, e.g., shoe dye. All such products are clearly labeled. "Accountability" includes issuing such products to detainees in the smallest workable quantities.   | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | There are no products containing methyl alcohol.   |
| Every employee and detainee using flammable, toxic, or caustic materials   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |

~~FOR OFFICIAL USE ONLY (LAW ENFORCEMENT SENSITIVE)~~

**ENVIRONMENTAL HEALTH AND SAFETY**

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| COMPONENTS   | Y                                   | N                                   | NA                       | REMARKS   |
|--|-------------------------------------|-------------------------------------|--------------------------|---|
| receives advance training in their use, storage, and disposal.   |                                     |                                     |                          |   |
| 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 type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | b2 high<br><br>b2 high<br>maintenance of the fire alarm system, sprinkler system, hood systems, emergency generators, and emergency lighting is not being conducted as required by NFPA Fire Codes. |
| A technically qualified officer conducts the fire and safety inspections.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | There is an alternate Safety position filled by an ICE, SIEA Supervisor assigned the responsibility.  |
| The Safety Office (or officer) maintains files of inspection reports.  | <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 has been approved by the AFOD and reviewed by the Federal Fire Department at the Seely Navel Base and the El Centro City Fire Department.  |
| The plan requires: <ul style="list-style-type: none"> <li>Monthly fire inspections;</li> <li>Fire protection equipment strategically located throughout the facility;</li> <li>Public posting of emergency plans with accessible building/room floor plans;</li> <li>Exit signs and directional arrows; and</li> <li>An area-specific exit diagram conspicuously posted in the diagrammed area.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Posted evacuation signs needs to be re-evaluated to ensure proper placement.  |
| Fire drills are conducted and documented monthly.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Review of the documentation indicated that the housing units were not receiving quarterly drills from each shift but corrective actions were taken and drills are now being conducted as required.  |
| A sanitation program covers barbering operations.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Local Policy, Environmental Health and Safety, dated April 17, 2008 fully addresses barbering operation and sanitation controls.  |
| The barber shop has the facilities and equipment necessary to meet sanitation requirements.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | Located in the recreation center.   |
| 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"/> |   |
| 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"/> | Weekly inspections are conducted throughout the   |



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| COMPONENTS   | Y                                   | N                        | NA                       | REMARKS   |
|--|-------------------------------------|--------------------------|--------------------------|---|
|  |                                     |                          |                          | facility to identify safety hazards.  |
| Standard cleaning practices include: <ul style="list-style-type: none"> <li>Using specified equipment; cleansers; disinfectants and detergents.</li> <li>An established schedule of cleaning and follow-up inspections.</li> <li></li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The facility follows standard cleaning procedures.   | <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"/> |   |
| A licensed medical waste contractor disposes of infectious/bio-hazardous waste.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Stericycle Inc. provides all medical waste disposal.                        |
| Staff is trained to prevent contact with blood and other body fluids and written procedures are followed.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Do the methods for handling/disposing of refuse meet all regulatory requirements?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| A licensed/Certified/Trained pest-control professional inspects for rodents, insects, and vermin. <ul style="list-style-type: none"> <li>At least monthly.</li> <li>The pest-control program includes preventative spraying for indigenous insects.</li> </ul>                         | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | American Pest Control is contracted to provide all pest-control operations. |
| Drinking water and wastewater is routinely tested according to a fixed schedule.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | City provided and tested as required by standards.                          |
| Emergency power generators are tested at least every two weeks. <ul style="list-style-type: none"> <li>Other emergency systems and equipment receive testing at least quarterly.</li> <li>Testing is followed-up with timely corrective actions (repairs and replacements).</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b>   |                                     |                          |                          |   |

**REMARKS:**

The fire safety program affords staff and detainees a level of safety that presents no imminent life safety concerns.

The fire safety systems throughout the facility to include fire alarms, sprinkler systems, kitchen hood fire suppression systems, emergency generators and emergency lighting/exit lights are not being inspected and tested on a monthly, quarterly, or annual schedule as required by the National Fire Protection Association (NFPA) standards, NFPA 72, NFPA 25 and NFPA 17A, NFPA 110, and NFPA 70. There is a contract with Candelaria Corporation effective 09/19/07 to perform the requirements of testing, inspecting and maintenance of these systems. On-site inspection and review of documentation failed to indicate services by Candelaria are being performed and monitored as required by the statement of work. Candelaria Corporation was notified by facility staff of this oversight and is scheduled to begin contract performance on Monday June 23, 2008. Management should provide direct oversight and supervision of the contractor to ensure compliance.

b2 high

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Review of documentation for fire drills indicated that the housing units were not receiving quarterly drills from each shift. Corrective action was taken and drills are now being conducted as required. Continued monitoring of the fire drill exercises is essential to ensure staff and detainees, are aware of their responsibilities in emergencies.

b6, b7c

/ June 19, 2008

**AUDITOR'S SIGNATURE / DATE**

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**HOLD ROOMS IN DETENTION FACILITIES**

**POLICY:** HOLD ROOMS WILL BE USED ONLY FOR TEMPORARY DETENTION OF DETAINEES AWAITING REMOVAL, TRANSFER, EOIR HEARINGS, MEDICAL TREATMENT, INTRA-FACILITY MOVEMENT, OR OTHER PROCESSING INTO OR OUT OF THE FACILITY.

| COMPONENTS  | Y                                   | N                        | NA                                  | REMARKS  |
|---|-------------------------------------|--------------------------|-------------------------------------|--|
| The hold rooms are situated within the secure perimeter.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| The hold rooms are well ventilated well lighted, and all activating switches are 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"/>            |  |
| Bunks, cots, beds, or other related make-shift sleeping apparatus are precluded from use inside hold rooms.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| The walls and ceilings of the hold rooms are tamper and escape proof.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| Individuals are not held in hold rooms for more than 12 hours.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | Documentation of supervision and 15 minute checks maintained electronically. |
| Male and females are segregated from each other.  | <input type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Females are not confined at ECSPC.   |
| Detainees under the age of 18 are not held with adult detainees.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| 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 type="checkbox"/>            | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Detainees are within view of supervisory staff.                              |
| All detainees are given a pat down search for weapons or contraband before being placed in the room.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| Officers closely supervise the detention hold rooms using direct supervision (Irregular visual monitoring.) <ul style="list-style-type: none"> <li>• Hold rooms are irregularly monitored every 15 minutes.</li> <li>• Unusual behavior or complaints are noted.</li> </ul> | <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.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            |  |
| There is a written evacuation plan that includes a designated officer to remove detainees from hold rooms 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"/>            |  |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b>  |                                     |                          |                                     |  |

**REMARKS:**

Intake and release processing is conducted in a professional manner. Detainees are searched appropriately and interviewed by staff to determine classification, housing, separation, and medical/psychiatric concerns.

b6, b7c

/ June 19, 2008

**AUDITOR SIGNATURE / DATE**

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

**POLICY** IT IS THE POLICY OF THE ICE SERVICE TO MAINTAIN AN EFFICIENT SYSTEM FOR THE USE, ACCOUNTABILITY AND MAINTENANCE OF ALL KEYS AND LOCKS.

| COMPONENTS   | Y                                   | N                                   | NA                       | REMARKS   |
|--|-------------------------------------|-------------------------------------|--------------------------|---|
| The security officer[s], or equivalent in IGSA's, has attended an approved locksmith training program.   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |   |
| 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"/> | Every lock in the facility is physically inspected by the Security Officer.   |
| 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"/> |   |
| Only authorized locks (as specified in the Detention Standard) are used in detainee accessible areas.  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | b2 high   |
| Grand master keying systems are prohibited.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |   |
| All worn or discarded keys and locks are cut up and properly disposed of.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |   |
| Padlocks and/or chains are prohibited from use 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"> <li>Occupational Safety and Environmental Health Manual, Ch. 3;</li> <li>National Fire Protection Association Life Safety Code 101.</li> </ul> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | b2 high   |
| The operational keyboard is sufficient to accommodate all the facility key rings, including keys in use, and is located in a secure area.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |   |
| Procedures are in place to ensure that key rings are: <ul style="list-style-type: none"> <li>Identifiable;</li> <li>The numbers of keys are cited; and</li> <li>Keys cannot be removed.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |   |
| Emergency keys are available for all areas of the facility.  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |   |
| 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"> <li>They are located in an area that permits constant officer observation.</li> <li>In an area that does not allow detainee or public access.</li> </ul>   | <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"/> | Combination of the automated Key Watch Control/Issue Cabinet and conventional check out from the Control Center. It |

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

**POLICY** IT IS THE POLICY OF THE ICE SERVICE TO MAINTAIN AN EFFICIENT SYSTEM FOR THE USE, ACCOUNTABILITY AND MAINTENANCE OF ALL KEYS AND LOCKS.

| COMPONENTS   | Y                                   | N                        | NA                       | REMARKS   |
|--|-------------------------------------|--------------------------|--------------------------|---|
|  |                                     |                          |                          | is noted that the daily accounting procedures of all keys throughout the facility was effective June 16, 2008 |
| All staff members are trained and held responsible for adhering to proper procedures for the handling of keys. <ul style="list-style-type: none"> <li>• Issued keys are returned immediately in the event an employee inadvertently carries a key ring home.</li> <li>• When a key or key ring is lost, misplaced, or not accounted for, the shift supervisor is immediately notified.</li> <li>• Detainees are not permitted to handle keys assigned to staff.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b>   |                                     |                          |                          |   |

**REMARKS:**

b2 high

b6, b7c / June 19, 2008  
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**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   | Y                                   | N                        | NA                       | REMARKS   |
|--|-------------------------------------|--------------------------|--------------------------|---|
| Staff conduct a formal count at least once each shift.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | There are 6 formal counts every twenty-four hours.  |
| Activities cease or are strictly controlled while a formal count is being conducted.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Certain operations cease during formal counts.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| All movement ceases for the duration of a formal count.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Formal counts in all units take place simultaneously.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Detainee participation in counts is prohibited.  | <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"/> | A face-to-photo count is conducted after an unsuccessful recount and at the 10:30PM count. The 8:30AM, 3:30PM and 10:30PM Face to Photo Count was observed by the reviewers with no concerns noted. |
| Officers positively identify each detainee before counting him/her as present.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Written procedures cover informal and emergency counts. <ul style="list-style-type: none"> <li>• They are followed during informal counts and emergencies.</li> </ul>                  | <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"/> |   |
| This training is documented in each officer's training folder.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b> |                                     |                          |                          |   |

**REMARKS:**

Count procedures and detainee compliance with count procedures are very effective. Movement in the units is curtailed during counts. Out counts are managed by the control center officer and are documented with count slips no different from those conducted in the living units. Local policy, counts and post orders, effectively outlines appropriate count practices.

b6, b7c

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**POST ORDERS**

**POLICY:** ICE 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   | Y                                   | N                        | 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"/> | Post orders are available to all staff on each of the 38 established posts.                           |
| The IGSA maintains a complete set (central file) of post orders.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The SPC maintains a central file of post orders   |
| The central file is accessible to all staff.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The OIC or Contract / IGSA equivalent initiates/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"/> |   |
| A review/updating/reissuing of post orders occurs regularly and at a minimum, annually.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Procedures keep post orders and logbooks secure from detainees at all times.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Post orders are secured when not in use.  |
| Every armed-post officer qualifies with the post weapon(s) before assuming post duty.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Armed-post post orders provide instructions for escape attempts.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The post orders for housing units track the event schedule.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Each set of post orders includes a specific chronology of duties to be performed by the staff member. |
| 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"/> | The log is kept by the control center office and the unit officer.                                    |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b> |                                     |                          |                          |   |

**REMARKS:**

Post orders are up to date and available to all staff.

All 38 sets of post orders were reviewed. They are well written and adequately explain general and specific duties related to each post. Documentation is maintained indicating signatures of all post orders reviewed.

b6, b7c / June 19, 2008

**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"> <li>• Posts to be inspected;</li> <li>• Required inspection forms;</li> <li>• Frequency of inspections;</li> <li>• Guidelines for checking security features; and</li> <li>• Procedures for reporting weak spots, inconsistencies, and other areas needing improvement</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Contract guard services conduct daily inspections, and the Deportation Operations Supervisor conducts weekly inspections.                |
| 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"/> |  |
| Documentation of security inspections is kept on file.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 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"/> |  |
| The front-entrance officer checks the ID of everyone entering or exiting the facility.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| All visits are officially recorded in a visitor logbook or electronically recorded.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 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"/> | Local policy restricts access to the control room and an approved list of staff authorized access is posted outside of the Control Room. |
| Detainees are restricted from 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"/> |  |
| Officers monitor all vehicular traffic entering and leaving the facility.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 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"> <li>• The driver's name;</li> <li>• Company represented;</li> <li>• Vehicle contents;</li> <li>• Delivery date and time;</li> <li>• Date and time out;</li> <li>• Vehicle license number; and</li> <li>• Name of employee responsible for the vehicle during the visit</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Officers thoroughly search each vehicle entering and leaving the facility.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 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 sally port.  | <input checked="" type="checkbox"/> | <input 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 is 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"/> |  |

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**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 |
|--|-------------------------------------|--------------------------|--------------------------|---------|
| Walls, fences, and exits, including exterior windows, are inspected for defects once each shift.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| Daily procedures include: <ul style="list-style-type: none"> <li>• Perimeter alarm system tests;</li> <li>• Physical checks of the perimeter fence; and</li> <li>• Documenting the results.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| Visitation areas receive frequent, irregular inspections.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b>                 |                                     |                          |                          |         |

**REMARKS:**

All vehicles and visitors are appropriately searched, identified, recorded, and processed into the facility at the front entrance or through the vehicle sally port. The sally port is currently undergoing a security enhancement project of installing new perimeter fencing, automated slide gates, camera surveillance, and intrusion detection. At the request of the review team, management agreed to assign one additional officer to this post temporarily to provide additional supervision during the construction process.

b6, b7c

/June 19, 2008

**AUDITOR'S 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  | Y                                   | N                        | 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"> <li>• Detainees are placed in the SMU (administrative) in accordance with written criteria.</li> </ul>   | <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"> <li>• A copy of the order given to the detainee within 24 hours.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Detainees placed in the SMU are provided a copy of detention orders within 24 hours of their placement.  |
| The OIC (or equivalent) regularly reviews the status of detainees in administrative detention. <ul style="list-style-type: none"> <li>• A supervisory officer conducts a review within 72 hours of the detainee’s placement in the SMU (administrative).</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | A review of 11 discipline files for the past three months verifies a detainee’s placement in the unit is reviewed within 72 hours.   |
| A supervisory officer conducts another review after the detainee has spent seven days in administrative segregation, and: <ul style="list-style-type: none"> <li>• Every week thereafter for the first month; and</li> <li>• Every 30 days after the first month.</li> <li>• Does each review include an interview with the detainee?</li> <li>• Is a written record made of the decision and the justification?</li> </ul> | <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"> <li>• The detainee is given an opportunity to appeal the reviewer's decision to someone else in the facility.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Interviews of detainees confined in the SMU revealed they are provided a copy of the detention order.  |
| The OIC (or equivalent) routinely notifies the Field Office Director (or staff officer in charge of IGSA's) any time a detainee's stay in administrative detention exceeds 30 days. <ul style="list-style-type: none"> <li>• Upon notification that the detainee's administrative segregation has exceeded 60 days, the FD forwards written notice to HQ Field Operations Branch Chief for DRO.</li> </ul>                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | A review of disciplinary files for the past three months revealed no detainee has remained in the SMU for more than 60 consecutive days.                                   |
| 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"> <li>• A written record is made of the decision and the justification.</li> <li>• The detainee receives a copy of this record.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The detainee is given the right to appeal to the OIC (or equivalent) the conclusions and recommendations of any review conducted after the detainee have remained in administrative segregation for seven consecutive days.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Detainees are provided copies of the decision to continue their confinement in the SMU. They are also provided written notification of their right to appeal the decision. |
| 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 is: <ul style="list-style-type: none"> <li>• Well ventilated;</li> <li>• Adequately lighted;</li> <li>• Appropriately heated; and</li> <li>• Maintained in a sanitary condition.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |

~~FOR OFFICIAL USE ONLY (LAW ENFORCEMENT SENSITIVE)~~

**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  | Y                                   | N                        | NA                       | REMARKS   |
|---|-------------------------------------|--------------------------|--------------------------|---|
| All cells are equipped with beds.<br>• Every bed is 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.<br>• When occupancy exceeds recommended capacity, do basic living standards decline?<br>• Do criteria for objectively assessing living standards exist?<br>• If yes, are the criteria included in the written procedures?  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The segregated detainees have the same opportunities to exchange/laundry clothing, bedding, and linen as detainees in the general population.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Detainees in the SMU are permitted to exchange bedding and clothing three times per week.   |
| Detainees receive three nutritious meals per day, from the general population's menu of the day.<br>• Do detainees eat only with disposable utensils?<br>• 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.<br>• The detainees have the opportunity to shower and shave at least three times a week.<br>• If not, explain.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The detainees are provided:<br>• Barbering services;<br>• Recreation privileges in accordance with the "Detainee Recreation" standard;<br>• Non-legal reading material;<br>• Religious material;<br>• The same correspondence privileges as detainees in the general population;<br>• Telephone access similar to that of the general population; and<br>• Personal legal material. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | A review of SMU daily activity logs revealed they are provided three meals per day and eat only with disposable utensils. Detainees in SMU are afforded the same privileges as those in the general population. |
| A health care professional visits every detainee at least three times a week.<br>• The shift supervisor visits each detainee daily.<br>• Weekends and holidays.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Procedures comply with the "Visitation" standard.<br>• The detainee retains visiting privileges; and<br>• The visiting room is 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 have the same law-library access as the general population.<br>• Are they required to use the law library <input checked="" type="checkbox"/> Separately, or <input type="checkbox"/> As a group?<br>• Are legal materials brought to them?   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The SMU maintains a permanent log of 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.<br>• Staff completes the form at the end of each shift.<br>• CDFs and IGSA facilities use Form I-888 (or local equivalent).  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |

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| COMPONENTS  | Y                                   | N                        | NA                       | REMARKS |
|---|-------------------------------------|--------------------------|--------------------------|---------|
| Staff record whether the detainee ate, showered, exercised, and took any applicable medication during every shift. <ul style="list-style-type: none"> <li>• Staff logs record all pertinent information, e.g., a medical condition, suicidal/assaultive behavior, etc;</li> <li>• The medical officer/health care professional signs each individual's record during each visit; and</li> <li>• The housing officer initials the record when all detainee services are completed or at the end of the shift.</li> </ul> | <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"> <li>• The weekly records are retained in the SMU until the detainee's return to the general population.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b>  |                                     |                          |                          |         |

**REMARKS:**

The SMU operates within standards and accepted correctional practices. The unit is clean, well ventilated, and detainees are afforded the same privileges as detainees in the general population. Medical staff and security supervisors visit the unit on a daily basis and members of the clergy make routine visits as well. Logs and forms of activities and events in the unit are maintained and contain accurate information.

b6, b7c /June 19, 2008

**AUDITOR'S SIGNATURE / DATE**

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**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  | Y                                   | N                        | 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 are limited to 60 days.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | A review of discipline packets for the past three months revealed no detainee has been sanctioned to more than 60 days of disciplinary segregation. |
| A completed Disciplinary Segregation Order accompanies the detainee into the SMU. <ul style="list-style-type: none"> <li>The detainee receives a copy of the order within 24 hours of placement in disciplinary segregation.</li> </ul>   | <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"> <li>After each formal review, the detainee receives a written copy of the decision and supporting reasons.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Weekly and monthly reviews are conducted in accordance with policy requirements.  |
| 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"/> |   |
| Living conditions in disciplinary SMUs remain the same regardless of behavior. <ul style="list-style-type: none"> <li>If no, does staff prepare written documentation for this action?</li> <li>Does the OIC sign to indicate approval.</li> </ul>                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Every detainee in disciplinary segregation receives the same humane treatment, regardless of offense.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | All detainees confined in the SMU receive humane treatment regardless of the offense.   |
| The quarters used for segregation are: <ul style="list-style-type: none"> <li>Well-ventilated.</li> <li>Adequately lighted.</li> <li>Appropriately heated.</li> <li>Maintained in a sanitary condition.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| All cells are equipped with beds that are securely fastened to the floor or wall of the cell.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The number of detainees confined to each cell or room is limited to the number for which the space was designate. <ul style="list-style-type: none"> <li>Does the OIC approve excess occupancy on a temporary basis?</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| When a detainee is segregated without clothing, mattress, blanket, or pillow (in a dry cell setting), 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 per day, selected from the Food Service's menu of the day. <ul style="list-style-type: none"> <li>Food is not used as punishment.</li> </ul>  | <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"/> |   |
| Detainees receive, unless documented as a threat to security:   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Detainees confined in   |

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**SPECIAL MANAGEMENT UNIT  
DISCIPLINARY SEGREGATION**

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| COMPONENTS   | Y                                   | N                        | NA                       | REMARKS   |
|--|-------------------------------------|--------------------------|--------------------------|---|
| <ul style="list-style-type: none"> <li>Barbering services;</li> <li>Recreation privileges;</li> <li>Other-than-legal reading material;</li> <li>Religious material;</li> <li>The same correspondence privileges as other detainees; and</li> <li>Personal legal material.</li> </ul>   |                                     |                          |                          | disciplinary segregation are afforded the opportunity for barber services, recreation, leisure and religious materials, and correspondence privileges.          |
| When phone access is limited by number or type of calls, the following areas are exempt: <ul style="list-style-type: none"> <li>Calls about the detainee's immigration case or other legal matters;</li> <li>Calls to consular/embassy officials; and</li> <li>Calls during family emergencies (as determined by the OIC/Warden).</li> </ul>                               | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Detainees are required to submit a request to staff to make official calls. Requests are processed and the detainee is permitted to contact official personnel. |
| A health care professional visits every detainee in disciplinary segregation every week day. <ul style="list-style-type: none"> <li>The shift supervisor visits each segregated detainee daily</li> <li>Weekends and holidays.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| 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"> <li>Legal service providers are notified of security concerns arising before a visit.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Visits from clergy are allowed. <ul style="list-style-type: none"> <li>The clergy member is given the option of visiting/not visiting the segregated detainee.</li> <li>Violent/uncooperative detainees are denied access to religious services when safety and security would otherwise be affected.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| SMU detainees have law library access. <ul style="list-style-type: none"> <li>Violent/uncooperative detainees retain access to the law library unless adjudicated a security threat in writing.</li> <li>Legal material brought to individuals in the SMU on a case-by-case basis.</li> <li>Staff documents every incident of denied access to the law library.</li> </ul> | <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"/> |   |
| The <u>SPC's</u> , the Special Management Housing Unit Record (I-888 or equivalent), is prepared as soon as the detainee is placed in the SMU. <ul style="list-style-type: none"> <li>All I-888s are filled out by the end of each shift.</li> <li>The <u>CDF/IGSA</u> facility use Form.</li> <li>I-888 (or equivalent local form).</li> </ul>                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |

**SPECIAL MANAGEMENT UNIT  
DISCIPLINARY SEGREGATION**

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| COMPONENTS  | Y                                   | N                        | NA                       | REMARKS |
|---|-------------------------------------|--------------------------|--------------------------|---------|
| SMU staff record whether the detainee ate, showered, exercised, took medication, etc. <ul style="list-style-type: none"> <li>• Details about the detainee logged, e.g., a medical condition, suicidal/violent behavior, etc.</li> <li>• The health care official sign individual records after each visit.</li> <li>• The housing officer initials the record when all detainee services are completed or at the end of the shift.</li> <li>• A new record is created weekly for each detainee in the SMU.</li> <li>• The SMU retains these records until the detainee leaves the SMU.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b>  |                                     |                          |                          |         |

**REMARKS:**

Detainees are required to submit a request to staff in order to make official calls. Requests are processed and the detainee is permitted to contact official personnel.

b6, b7c

/June 19, 2008

**AUDITOR'S SIGNATURE / DATE**

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## 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   | Y                                   | N                        | 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 the: <ul style="list-style-type: none"> <li>• Maintenance Department;</li> <li>• Medial Department;</li> <li>• Food Service Department;</li> <li>• Electronics Shop;</li> <li>• Recreation Department; and</li> <li>• Armory.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The facility has a policy for the regular inventory of all tools. <ul style="list-style-type: none"> <li>• The policy sets minimum time lines for physical inventory and all necessary documentation.</li> <li>• ICE facilities use AMIS bar code labels when required.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| The facility has a tool classification system. Tools are classified according to: <ul style="list-style-type: none"> <li>• Restricted (dangerous/hazardous); and</li> <li>• Non-Restricted (non-hazardous).</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | All tools are classified as restricted in the facility.                             |
| Department heads are responsible for implementing tool-control procedures.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| 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"> <li>• The system ensures that all stored tools are accountable.</li> <li>• Commonly used tools (tools that can be mounted) are stored in such a way that missing tool is readily notice.</li> </ul>                                       | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Tools in all departments are stored in a secure manner and are easily identifiable. |
| Each facility has procedures for the issuance of tools to staff and detainees.   | <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"> <li>• Verbal and written notification;</li> <li>• Procedures for detainee access; and</li> <li>• Necessary documentation/review for all incidents of lost tools.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Tools are issued to staff only. Detainees are not permitted to handle or use tools. |
| 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"/> |   |
| All private or contract repairs and maintenance workers under contract to ICE, 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"/> |   |

**ACCEPTABLE**     
  **DEFICIENT**     
  **AT-RISK**     
  **REPEAT FINDING**

**REMARKS:**

Staff responsible for the development and maintenance of the tool control program demonstrates a very good understanding of procedures and benefits of the proper handling and control of tools. During the past year, there were no instances where a tool was lost or could not be accounted for.

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Detainees are not allowed to use any tools and they are not assigned voluntary work duties in the maintenance section. Tools are accounted for each day by a minimum of two staff members.

b6, b7c

June 19, 2008

**AUDITOR'S SIGNATURE / DATE**

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**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 ICE 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.

**STANDARD NA: CHECK THIS BOX IF ALL ICE TRANSPORTATION IS HANDLED ONLY BY THE ICE FIELD OFFICE OR SUB-OFFICE IN CONTROL OF THE DETAINEE CASE.**

| 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"/> | A review of staff training records verifies all transporting officers possess a valid CDL. |
| Supervisors maintain records for each vehicle operator.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Officers use a checklist during every vehicle inspection. <ul style="list-style-type: none"> <li>• Officers report deficiencies affecting operability; and</li> <li>• Deficiencies are corrected before the vehicle goes back into service.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Staff assigned to transport vehicles performs safety inspections prior to each trip.       |
| Transporting officers: <ul style="list-style-type: none"> <li>• Limit driving time to 10 hours in any 15 hour period;</li> <li>• Drive only after eight consecutive off-duty hours;</li> <li>• Do not receive transportation assignments after having been on duty, in any capacity, for 15 hours;</li> <li>• Drive a 50-hour maximum in a given work week; a 70-hour maximum during eight consecutive days;</li> <li>• 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.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Written procedures specifically limit driving times for transport officers.                |
| Two officers with valid CDLs required in any bus transporting detainees. <ul style="list-style-type: none"> <li>• When buses travel in tandem with detainees, there are two qualified officers per vehicle.</li> <li>• An unaccompanied driver may transport an empty vehicle.</li> </ul>  | <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 manufacturer's occupancy level.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Staff ensures all detainees are accounted for after each stop.                             |
| 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"> <li>• Additional visual counts are made whenever the vehicle makes a scheduled or unscheduled stop.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 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"/> |  |
| Officers ensure that no one contacts the detainees. <ul style="list-style-type: none"> <li>• One officer remains in the vehicle at all times when detainees are present.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Meals are provided during long distance transfers. <ul style="list-style-type: none"> <li>• The meals meet the minimum dietary standards, as identified by</li> </ul>  | <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 ICE 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.

**STANDARD NA: CHECK THIS BOX IF ALL ICE TRANSPORTATION IS HANDLED ONLY BY THE ICE FIELD OFFICE OR SUB-OFFICE IN CONTROL OF THE DETAINEE CASE.**

| COMPONENTS   | YES                                 | NO                       | NA                       | REMARKS  |
|--|-------------------------------------|--------------------------|--------------------------|--|
| dieticians utilized by ICE.  |                                     |                          |                          |  |
| 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"> <li>• Before accepting the meals, the vehicle crew raises and resolves questions, concerns, or discrepancies with the Food Service representative;</li> <li>• Basins, latrines, and drinking-water containers/dispensers are cleaned and sanitized on a fixed schedule.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Vehicles have: <ul style="list-style-type: none"> <li>• Two-way radios;</li> <li>• Cellular telephones; and</li> <li>• Equipment boxes stocked in accordance with the Use of Force Standard.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| 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 is: <ul style="list-style-type: none"> <li>• Inventoried;</li> <li>• Inspected; and</li> <li>• Accompanies the detainee.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The following contingencies are included in the written procedures for vehicle crews: <ul style="list-style-type: none"> <li>• Attack</li> <li>• Escape</li> <li>• Hostage-taking</li> <li>• Detainee sickness</li> <li>• Detainee death</li> <li>• Vehicle fire</li> <li>• Riot</li> <li>• Traffic accident</li> <li>• Mechanical problems</li> <li>• Natural disasters</li> <li>• Severe weather</li> <li>• Passenger list includes women or minors</li> </ul>                     | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Vehicle trip boxes include emergency plans and procedures. |

**ACCEPTABLE**     
  **DEFICIENT**     
  **AT-RISK**     
  **REPEAT FINDING**

**REMARKS:**

The transport operation at the facility is well managed and supervised. Transport staff and supervisors are knowledgeable of bus operations and transport procedures.

b6, b7c      June 19, 2008  
**AUDITOR'S SIGNATURE / DATE**

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**USE OF FORCE**

**POLICY:** THE U.S. DEPARTMENT OF HOMELAND SECURITY 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"/> | Local policy, Use of Force.  |
| 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"> <li>Ranking detention official, health professional, and others confer before every calculated use of force.</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Local policy, Use of Force.  |
| 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"> <li>Under staff supervision.</li> </ul>   | <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"/> | While all uses of force are reviewed, 4 after actions conducted in 2008 did not reveal the signature of the AOIC, SDDO, and Health Services Administrator. |
| Staff: <ul style="list-style-type: none"> <li>Do not use force as punishment;</li> <li>Attempt to gain the detainee's voluntary cooperation before resorting to force;</li> <li>Use only as much force as necessary to control the detainee; and</li> <li>Use restraints only when other non-confrontational means, including verbal persuasion, have failed or are impractical.</li> </ul>   | <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"/> |  |
| Use-of-Force Team follows written procedures that attempt to prevent injury and exposure to communicable disease(s).  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Standard procedures associated with using four-point restraints include: <ul style="list-style-type: none"> <li>Soft restraints (e.g., vinyl);</li> <li>Dressing the detainee appropriately for the temperature;</li> <li>A bed, mattress, and blanket/sheet;</li> <li>Checking the detainee at least every 15 minutes;</li> <li>Logging each check;</li> <li>Turning the bed-restrained detainee often enough to prevent soreness or stiffness;</li> <li>Medical evaluation of the restrained detainee twice per eight-hour shift; and</li> <li>When qualified medical staff is not immediately available, staff position the detainee "face-up".</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The shift supervisor monitors the detainee's position/condition every two   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |

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### USE OF FORCE

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| COMPONENTS  | YES                                 | NO                                  | NA                       | REMARKS                                  |
|---|-------------------------------------|-------------------------------------|--------------------------|--|
| hours. <ul style="list-style-type: none"> <li>• He/she allows the detainee to use the rest room at these times under safeguards.</li> </ul>   | <input 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"> <li>• Medical staff is consulted before staff use pepper spray/non-lethal weapons.</li> <li>• Medical staff reviews the detainee's medical file before use of a non-lethal weapon is authorized.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |  |
| Special precautions are taken when restraining pregnant detainees. <ul style="list-style-type: none"> <li>• Medical personnel are consulted</li> </ul>  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Women are not confined at this facility. |
| 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 is 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"/> |  |
| All officers receive training in self-defense, confrontation-avoidance techniques and the use of force to control detainees. <ul style="list-style-type: none"> <li>• Specialized training is given and Officers are certified in all devices they use.</li> </ul>                                | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |  |
| <u>In SPCs</u> , is the Use of Force form is used? In other facilities (IGSAs / CDFs) is this form or its equivalent used?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |  |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b>  |                                     |                                     |                          |  |

**REMARKS:**

There has been no calculated use of force within the past year and only four incidents of the immediate use of force within the past year. All uses of force were reviewed and determined to be appropriate. The AFOD, Assistant OIC, and Supervisory Detention and Deportation Officer, and Health Services Administrator should sign the after action report at the completion of each review.

b6, b7c /June 19, 2008

**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  | Y                                   | N                        | 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"/> | Rounds are conducted at minimum weekly. |
| Detention and Deportation Staff conduct scheduled weekly visits with detainees held in the IGSA.      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Rounds are conducted at minimum weekly. |
| 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"/> |   |

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**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   | Y                                   | N                        | NA                       | REMARKS |
|--|-------------------------------------|--------------------------|--------------------------|---------|
| ICE information request Forms are available at the IGSA for use by ICE detainees.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| The IGSA treats detainee correspondence to ICE staff as Special Correspondence.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| ICE staff responds to a detainee request from an IGSA within 72 hours.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| 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 checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |         |
| <input checked="" type="checkbox"/> <b>ACCEPTABLE</b> <input type="checkbox"/> <b>DEFICIENT</b> <input type="checkbox"/> <b>AT-RISK</b> <input type="checkbox"/> <b>REPEAT FINDING</b> |                                     |                          |                          |         |

**REMARKS:**

ICE staff and ICE detainees interact daily at the ECSPC.

Postings are in all housing areas regarding:

- OIG Hotline Information
- Sexual Harassment/Assault Prevention and Reporting
- Pro-Bono Legal Telephone Numbers and Consulate Office Telephone Numbers

b6, b7c / June 19, 2008

**AUDITOR'S SIGNATURE / DATE**

### DETAINEE TRANSFER STANDARD

**POLICY:** ICE WILL MAKE ALL NECESSARY NOTIFICATIONS WHEN A DETAINEE IS TRANSFERRED. IF A DETAINEE IS BEING TRANSFERRED VIA THE JUSTICE PRISONER ALIEN TRANSPORTATION SYSTEM (JPATS), ICE WILL ADHERE TO JPATS PROTOCOLS. IN DECIDING WHETHER TO TRANSFER A DETAINEE, ICE WILL TAKE INTO CONSIDERATION WHETHER THE DETAINEE IS REPRESENTED BEFORE THE IMMIGRATION COURT. IN SUCH CASES, THE FIELD OFFICE DIRECTOR WILL CONSIDER THE DETAINEE'S STAGE WITHIN THE REMOVAL PROCESS, WHETHER THE DETAINEE'S ATTORNEY IS LOCATED WITHIN REASONABLE DRIVING DISTANCE OF THE FACILITY, AND WHERE THE IMMIGRATION COURT PROCEEDINGS ARE TAKING PLACE.

| COMPONENTS  | Y                                   | N                        | NA                       | REMARKS  |
|---|-------------------------------------|--------------------------|--------------------------|--|
| When a detainee is represented by legal counsel or a legal representative, and a G-28 has been filed, the representative of record is notified by the detainee's Deportation Officer. <ul style="list-style-type: none"> <li>• The notification is recorded in the detainee's file; and</li> <li>• When the A File is not available, notification is noted within DACS</li> </ul>                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The notification is recorded in the detainees A-file, and noted in the comments section of the DACS.                                   |
| Notification includes the reason for the transfer and the location of the new facility.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The deportation officer is allowed discretion regarding the timing of the notification when extenuating circumstances are involved.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| The attorney and detainee are notified that it is their responsibility to notify family members regarding a transfer.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Notification is provided via the "Detainee Transfer Notification"  |
| Facility policy mandates that: <ul style="list-style-type: none"> <li>• Times and transfer plans are never discussed with the detainee prior to transfer;</li> <li>• The detainee is not notified of the transfer until immediately prior to departing the facility; and</li> <li>• The detainee is not permitted to make any phone calls or have contact with any detainee in the general population.</li> </ul> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | ECSPC SOP Detainee Transfer,   |
| The detainee is provided with a completed Detainee Transfer Notification Form.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Form G-391 or equivalent authorizing the removal of a detainee from a facility is used.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The G-391 "Order to Escort Alien" is provided to processing and Escort Officers.   |
| For medical transfers: <ul style="list-style-type: none"> <li>• The Detainee Immigration Health Service (or IGSA) (DIHS) Medical Director or designee approves the transfer;</li> <li>• Medical transfers are coordinated through the local ICE office; and</li> <li>• A medical transfer summary is completed and accompanies the detainee.</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| Detainees in ICE facilities having DIHS staff and medical care are transferred with a completed transfer summary sheet in a sealed envelope with the detainee's name and A-number, and the envelope is marked Medical Confidential.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |
| For medical transfers, transporting officers receive instructions regarding medical issues.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Information pertaining to scheduled medications, ambulatory conditions, etc. is relayed to the transport officers.                     |
| Detainee's funds, valuables, and property are returned and transferred with the detainee to his/her new location.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Funds (cash) are given directly to the detainee. Personal property, jewelry, legal materials does accompany the detainee in transport. |
| Transfer and documentary procedures outlined in Section C and D are followed.   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | "Request for Bed/Designation" and "Preparation and Transfer of Records" are followed.  |

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**DETAINEE TRANSFER STANDARD**

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| COMPONENTS  | Y                                   | N                        | NA                       | REMARKS   |
|---|-------------------------------------|--------------------------|--------------------------|---|
| Meals are provided when transfers occur during normally schedule meal times.  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Meals are provided in compliance with the "Land Transportation" standard. |
| An A File or work folder accompanies the detainee when transferred to a different field office or sub-office.         | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |
| Files are forwarded to the receiving office via overnight mail no later than one business day following the transfer. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |   |

**ACCEPTABLE**     
  **DEFICIENT**     
  **AT-RISK**     
  **REPEAT FINDING**

**REMARKS:**

The Detainee Transfer standard is in full compliance.

b6, b7c June 19, 2008  
**AUDITOR'S SIGNATURE / DATE**