

# ICE/DRO RESIDENTIAL STANDARD

## TOOL CONTROL

**I. PURPOSE AND SCOPE.** Control of tools, culinary utensils, and medical and dental instruments, equipment, and supplies is maintained, protecting residents, staff, contractors, and volunteers from harm and contributing to orderly facility operations.

**II. EXPECTED OUTCOME.** The expected outcome of this Standard is as follows:

1. Tools, culinary utensils, and medical and dental instruments, equipment, and supplies (particularly syringes, needles, and other sharps) will be continually controlled and accounted for.
2. Where required, residents have regular access to translation services and/or are provided information in a language that they understand.
3. The standard complies with federal laws and with DHS regulations regarding residents with special needs.

**III. DIRECTIVES AFFECTED.** None

## IV. REFERENCES

The First Edition National Residential Standards were written using a variety of methodologies including previous and current practices, review and comment from various subject matter experts, review and comment from various government and non-government organizations, and a review of current state codes in Pennsylvania and Texas. Each standard is written in a manner that affords each resident admission and continuous housing to a family residential facility in a dignified and respectful manner. There are no specific codes, certifications, or accreditations that deal specifically with unique management requirements of families awaiting the outcome of their immigration proceeding in a non-secure custodial environment.

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

## V. EXPECTED PRACTICES

### A. Overview

In a Residential environment, all staff must be alert for any situation where tools, culinary utensils, and medical and dental instruments, equipment, and supplies (particularly syringes, needles, and other sharps) are in the possession of, or available to, residents, other than those authorized to have them (such as on work details).

Control, care, and accountability for tools:

- Impedes their use in escape attempts, as weapons, and in other ways that can be hazardous to individual safety or the good order of the facility;
- Improves the appearance of shop and construction areas;
- Helps ensures tools are in good repair when needed;
- Reduces the costs of tool maintenance and inventory; and
- Teaches resident workers principles of tool accountability and responsibility.

## **B. Written Policy and Procedures Required**

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

1. A staff position to be responsible for:
  - Developing and implementing tool control procedures, and
  - Establishing an inspection system to ensure accountability;

The facility administrator shall delegate these responsibilities to the Assistant Facility Administrator for Operations and shall also assign, in writing, the collateral duties of Tool Control Staff to a staff member of the facility maintenance department.

2. A tool classification system;
3. Procedures for marking tools so they are readily identifiable;
4. Procedures for storing tools;
5. Procedures and schedules for the daily inventory of tools;
6. Procedures for issuing tools to staff and resident workers;
7. Procedures for documenting issuance of tools to staff and resident workers;
8. Procedures governing lost tools;
9. Procedures for surveying and destroying excess, broken, or worn-out tools; and
10. Procedures for inspecting and inventorying tools and equipment brought into the facility temporarily (repair and maintenance workers, sports teams. etc.)

## **C. Tool Classification**

The facility shall develop and implement a tool classification system.

Tools are assigned one of two categories:

- Restricted (Class "R") -- Dangerous/hazardous tools
- Non-Restricted -- Non-hazardous tools

Class "R" tools include:

- Tools too dangerous for residents to handle without constant staff supervision
- Tools to which resident access is prohibited
- Tools that could facilitate an escape/escape attempt
- Tools useful in making weapons, that could double as weapons, or that are capable of causing serious bodily harm
- Power hand tools, with or without cords
- Other tools that are generally hazardous to facility security or personal safety

Examples of restricted tools include:

- Metal cutting blades
- Mixing chambers
- Bolt cutters
- Ramset gun and ammunition (stored in armory only)
- Diamond-tipped tools
- Core drills
- Drills
- Circular saws
- Kitchen knives

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

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

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

Drill bits, metal/wood                    1/32" – 7/8"

Drill bits, metal/wood                    7/16" - 7/8"

Wrench, comb. box/open end 1/4" - 7/16"

Wrench, comb. box/open end 7/16" - 7/8"

When a single set listing would not be sufficiently clear, however, each tool must be listed separately. For example, if a facility had:

A single "wrench, combination box/open end, 1 7/8 inches" but not the

smaller or larger sizes; or

Several wrenches in different sizes, but the size differences are not standard.

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

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

#### **E. Acetylene**

Staff shall:

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

#### **F. Departmental Responsibilities**

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

1. Facility Maintenance Department
2. Medical Department
3. Food Service Department
4. Electronics Shop
5. Recreation Department
6. Armory

#### **G. Assistant Facility Administrator for Operations Tool Identification**

The facility administrator shall establish written procedures for marking tools, making them readily identifiable.

#### **H. Storage in Work Areas**

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

#### **I. Receipt of Tools**

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

If the warehouse is located within the secure perimeter, the facility administrator shall develop site-specific procedures, for example, storing the tools at the rear sallyport until picked up and receipted by the Tool Control Staff. The Tool Control Staff shall immediately place certain tools (for example, band saw blades, files, and all restricted tools) in secure storage.

2. The new tools shall be issued only after the Tool Control Staff has marked and inventoried them. Inventories that include any portable power tools shall provide brand name, model, and size, description, and AMIS number.

## **J. Tool Inventories**

The facility administrator shall schedule, and establish procedures for, the quarterly inventorying of all tools.

1. **Inventory Files.** The Assistant Facility Administrator for Operations shall maintain a separate file folder for each shop or area in which tools are stored.

2. **Tools Used by Contractors.** Staff shall prepare an inventory of all tools and equipment used by contractors working inside the facility, upon the contractor's admission and departure. The Assistant Facility Administrator for Operations shall establish control procedures, particularly for restricted tools. The Assistant Facility Administrator for Operations, facility maintenance supervisor, and construction foreman shall maintain copies of all such inventories and control procedures.

3. **Tools Purchased from Surplus Property.** Tools purchased or acquired from surplus property shall be stored in the designated, secure storage area. The responsible employee shall maintain a perpetual inventory of unmarked or excess tools returned to secure storage for issue or reissue. The Tool Control Staff has sole authority to draw tools from this source. Any such tools kept in the Tool Control Staff's storage area shall be registered in a perpetual inventory.

4. **Control and Inventory of Certain Items Not Classified as Tools.** Other items that require strict property management controls, like weapons, chemical agents, restraints, other use-of-force and disturbance control equipment, binoculars; communication equipment, and similar items shall be inventoried (with serial numbers), maintained, issued, and disposed of in accordance with the procedures established herein for tools.

## **K. Issuing Tools**

Each facility shall have procedures in place for

- The issuance of tools to staff and residents;
- Security issues of restricted and unrestricted tools;
- Control of ladders, extension cords, and ropes.

## **L. Lost Tools**

The facility administrator shall develop and implement procedures governing lost tools, including:

- Verbal and written notification to supervisory officials
  - Handling residents with prior access to the tool(s) in question
  - Documentation and review
1. When a **restricted or non-restricted** tool is missing or lost, staff shall notify the Assistant Facility Administrator for Operations in writing.
  2. When the tool is a **restricted (Class “R”)** tool, staff shall inform the shift supervisor orally immediately upon discovering the loss. Any resident(s) who may have had access to the tool shall be held at the work location pending completion of a thorough search.
  3. When a **medical department tool or equipment item** is missing or lost, staff shall immediately inform the HSA, who shall make the immediate verbal notification to the Assistant Facility Administrator for Operations or shift supervisor and written notification to the facility administrator.
  4. The shift supervisor's office shall maintain a lost-tool file, monitor the individual reports for accuracy, ascertain any unusual patterns or occurrences of loss in one or more shops, document search efforts, and send written notification to the Assistant Facility Administrator for Operation
  5. 5. On the day a tool is recovered, staff shall complete and send copies of the Lost or Missing Tool Report to the Assistant Facility Administrator for Operations and shift supervisor.
  6. The facility administrator shall implement quarterly evaluations of lost/missing tool files, reviewing the thoroughness of investigations and efforts to recover tools. Documentation of the quarterly evaluations shall be maintained on the right side of the tool inventory folder for the shop or area concerned.

## **M. Disposition of Excess Tools**

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

## **N. Assistant Facility Administrator for Operations Private/Contract Repair and Maintenance Workers**

All visitors, including repair and maintenance workers who are not ICE/DRO or facility employees, etc., shall submit to an inspection and inventory of all tools, tool boxes, and equipment that could be used as weapons before entering and leaving the facility. At a minimum a basic criminal background and immigration check will be conducted by ICE staff on all non-facility repair or maintenance personnel before entry into the facility.

Staff shall accompany non-employee workers in the facility to ensure that security and safety precautions and procedures are followed at all times, including removing tools at

the end of each shift. The contractor will maintain a copy of their tool inventory with them at all times while in the facility.

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

**Standard Approved:**

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**John P. Torres**  
**Director**  
**Office of Detention and Removal**

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**Date**