

INS DETENTION STANDARD

SECURITY INSPECTIONS

I. POLICY

In an area with heightened security requirements, the post officer must thoroughly understand all aspects of facility operations. Specially trained officers only will be assigned to these security-inspection posts.

II. APPLICABILITY

The standards provided in this Detention Standard shall apply to the following facilities housing INS detainees:

1. Service Processing Centers (SPCs);
2. Contract Detention Facilities (CDFs); and
3. State or local government facilities used by INS through Intergovernmental Service Agreements (IGSAs) to hold detainees for more than 72 hours; referred to as "IGSA facilities."

Within the document additional implementing procedures are identified for SPCs and CDFs. Those procedures appear in italics. IGSA facilities may find such procedures useful as guidelines. IGSAs may adopt, adapt or establish alternatives to, the procedures specified for SPCs/CDFs, provided they meet or exceed the objective represented by each standard.

See the separate "Definitions" Standard for the meaning of certain terms used in this document.

III. STANDARDS PROCEDURES

A. Security Inspections

Security inspections are necessary to control the introduction of contraband, ensure facility safety, security, and good order, prevent escapes, maintain sanitary standards and eliminate fire and safety hazards

B. Facility Policy

The Officer in Charge (OIC) shall establish a comprehensive security-inspection system that covers every area in the facility, including the perimeter fence-line.

The written policy will specify the posts and areas INS requires SPCs/CDFs to submit the inspection forms, along with the frequency of inspections.

IGSA facilities shall use these requirements as a guide in formulating their inspection schedules.

It will also provide guidelines for security-feature checks and for reporting security vulnerabilities, inconsistencies, etc.

In SPCs/CDFs, the officer assuming the post shall conduct a security check of the area, record the results in the post logbook, and prepare and submit maintenance work requests as required.

Documentation of all daily inspections (shift, area, or post) is required.

C. Inspection Review

The OIC will identify the officer responsible for including all areas of the facility in the daily security-inspection process.

In SPCs/CDFs the Supervisory Detention Enforcement Officer (SDEO) or contract equivalent will have this responsibility, under the Chief Detention Enforcement Officer (CDEO) or contract equivalent. The SDEO or on-duty supervisor will review all search and inspection documentation.

The SDEO will report recurrent problems with maintenance work to the department head and/or Assistant OIC (AOIC). These problems would include, e.g., unresponsiveness to work orders, failures to take corrective action and/or failed attempts to fix or solve the problem within a reasonable amount of time.

When the SDEO/AOIC advises the OIC of the need for major, security-related expenditures (mechanical, electrical, structural, or other repairs or improvements), the OIC will request funding through the INS chain of chain.

D. Search Locations and Procedures

1. Front Entrance

The facility's front entrance shall have a sally port with electronic interlocking doors or grilles to prevent unauthorized entry or exit.

Because the front-entrance post involves constant contact with the general public, those post officers must have certain public-relations skills, such as politeness, tact, and the ability to interact and communicate easily and effectively with a diversity of people, etc., as well as to enforce regulations. These officers must also dress neatly.

a. Identification

The officer assigned to this post shall check the identification documents of every visitor, employee, and other person entering or leaving the facility (see the "Visitation" standard).

b. Record

The OIC will establish procedures for tracking the arrivals and departures of contract employees

In SPCs/CDFs:

1. *The post officer will maintain the visitor logbook, the bound ledger in which all non-staff visits are recorded.*
2. *Every entry in the logbook will identify the person or department visited; date and time of visitor's arrival; purpose of visit; unusual requests; and time of departure.*
3. *The entry for a person visiting a detainee will also include the name and A-number of the detainee being visited, along with the visitor's relationship to the detainee, immigration status, and address. The post officer will require the visitor to print and sign his/her name at the designated spot.*
4. *All INS employees will carry INS-issued identification cards with photograph and signature. The main-gate/front-entrance officer will maintain a file of Personal Data Cards (Form G-74) for all staff permanently stationed at the facility. An "In/Out Box" at the main gate/front entrance will account for all staff entering and leaving the perimeter.*
5. *The OIC will establish procedures for tracking the arrivals and departures of contract employees. However, the main gate/front entrance officer will maintain a separate file of contract employee Personal Data Cards (Form G-74), laminated, with photograph, issue date, and OIC signature.*

c. Issuance of Visitor Passes

The OIC will establish procedures for issuing visitor passes to all visitors entering the facility (at the main gate/front entrance). The visitor must prominently display this pass on an outer garment, where staff can see it at a glance.

Unless the OIC grants a waiver, every visitor must present a current photo-identification card to receive a visitor pass.

In SPCs/CDFs, the post officer will check the validity of the identification. In exchange for the photo-identification card (driver's license, student ID card, etc.), the post officer will issue the visitor a color-coded pass, provided the photo resembles the visitor closely enough to identify the visitor. The visitor must leave his/her photo-identification card with the post officer until the end of the visit, marked by the time-out entry in the logbook. The photo-identification card requirement may be waived at the discretion of the OIC.

The post officer holds all visitor identification cards officer at the front entrance/main gate for a range of security reasons: in an emergency (accident, fire, hostage-taking) or other incident; as a check on logbook data; and as a disincentive for criminal or disruptive behavior (distributing drugs/other contraband; inciting an internal disturbance or riot), etc.

1. Blue Visitor Passes (or color-code equivalent)

INS employees not permanently stationed at the facility and official visitors from other Department of Justice agencies will receive "blue" passes. Visitors with blue passes do not need, but may request, escorts.

The post officer will record every official visitor's arrivals and departures in the visitor logbook, providing the standard information (see paragraph D.1.b.2., above).

To save time, all INS employees with frequent business at the facility but stationed elsewhere should complete a G-74 for the front-entrance Personal Data Card file.

2. Yellow Visitor Passes (or color-code equivalent)

Law enforcement officers not directly connected with INS, vendors, and other persons visiting in an official capacity will receive "yellow" passes. Their visits will be recorded in the visitor logbook. Escorts are required for visitors with yellow passes.

3. Red Visitor Passes (or color-code equivalent)

Persons visiting detainees or visiting the facility in a nonofficial capacity, regardless of affiliation, will receive "red" passes. The post officer will enter their visits in the visitor logbook (see paragraphs D.1.b.2. and 3, above). Escorts are required for visitors with red passes.

If a visitor leaves the facility without surrendering the visitor pass and/or retrieving his/her identification card, the post officer will photocopy the identification card and attach it to a memo to the SDEO stating:

- 1. Visitor name;*
- 2. Visitor title (if applicable);*
- 3. Person or department visited;*
- 4. Time pass was issued;*
- 5. Reason for not retrieving pass from visitor and/or not returning the identification card; and*
- 6. Anything suspicious about the visitor (if applicable).*

The main gate/front-entrance officer must account for all visitors passes when coming on duty, immediately reporting any discrepancies to the SDEO. The post officer is also responsible for monitoring the inventory of visitor passes and identification cards, and reporting unusually long visits (indicated by the unretrieved identification card and/or missing visitor pass) of to the SDEO.

2. Control Centers

In SPCS/CDFs, the OIC will establish procedures to implement the following Control Center requirements:

- 1. Round-the-clock staffing;*
- 2. Limited staff access;*
- 3. No detainee access (NOTE: cleaning duties generally assigned to detainees will, in the Control Center, be assigned to facility employees);*
- 4. Communications center:*
- 5. Current home and/or cellphone number of every officer on the recall list; if inaccessible by phone, beeper/pager number, e-mail address, or other means of off-duty contact (approved by OIC):*
 - a. Numbers on file in both Control Center and shift supervisor's office;*
 - b. Maintained in a secure file;*
 - c. Privacy Act-compliant;*
 - d. For emergency recall or urgent business only;*
 - e. Updated quarterly.*

The file containing the recall list will prominently feature the following notice:

“This information must be safeguarded. Use is restricted to those needing the information in the performance of their official duties. Misuse will subject the user to criminal liability. This agency will view any misuse of this information as a serious violation of the employee code of conduct, which may result in disciplinary action, including removal.”

6. *Round-the-clock accountability for equipment.*
7. *All staff shall normally make watch calls (officer safety checks) to the control center, every half-hour between the hours of 6:00 P.M. and 6:00 A.M. Individual facility policy may designate another post to conduct watch calls. Any exception for staff not to make watch calls must be authorized by the OIC.*

The Supervisors will carefully screen officers for the highly responsible Control Center post assignment(s). The Control Officer's responsibilities include, among other things, key control, count procedures, and public-address-system operations.

IGSA facilities shall use the above guidelines when formulating Control Center procedures.

3. Vehicle Control

1. Vehicle Entrance

a. Identification

Facilities shall have policies and procedures to control and document all vehicular traffic entering the facility.

The main-gate/front-entrance officer will control all vehicular traffic entering and leaving the facility. The officer will check the driver's license of every person driving into the facility, regardless of purpose (visit, delivery, etc.). If the license is valid, the officer will admit the vehicle. While the driver is within the facility's secure perimeter, the officer will hold the driver's license (see section D.1.c., above).

b. Vehicle Log

The post officer will log the following information on every vehicle, including tag number, driver's name, firm represented, vehicle contents, date, time in, time out, and facility employee responsible for the vehicle on-site.

b. Controls

All facilities shall have policies and procedures to ensure that effective controls are in place to monitor all vehicles that enter the secure perimeter of the facility.

In SPCs/CDFs:

1. *The main-gate/front-entrance officer will search the vehicle before it enters or leaves the facility, both to prevent the introduction/removal of contraband and to prevent the vehicle's use as a means of escape. All drivers making deliveries must submit to questioning about firearms, munitions, knives, ropes, jacks, narcotics, and other items considered contraband (see the "Contraband" Standard).*
2. *Any article posing a threat to the facility's security will be held at the gate or removed from facility grounds. The driver of a delivery vehicle may be accompanied by one or more co-worker(s), but no unauthorized passengers.*
3. *The facility employee responsible for vehicle oversight will, as escort:*
 - *walk behind the vehicle;*
 - *directly supervise loading and unloading ;*
 - *retain the ignition keys, never leaving them in the vehicle; and*
 - *close windows, lock doors and trunks, secure toolboxes, ladders, etc., before leaving the vehicle unattended.*
4. *Before the exit gate, the driver will stop at the spot designated. The gate operator will not allow the vehicle to depart until satisfied that neither the driver nor the escorting officer is under duress. With that established, officers will again search the vehicle. If a thorough search is impossible, the vehicle will be unloaded or held pending completion of the next official count. If the vehicle or vehicular equipment must remain inside the compound overnight, staff will render it inoperable.*
5. *If the post officer has doubts about a person's identity, he/she will not permit the person to exit, pending positive identification.*
6. *Staff will handle any legal or special mail deliveries for detainees in accordance with the "Detainee Correspondence and other Mail" standard.*

4. Special Management Unit (SMU)

a. SMU Security Measures

Every OIC will establish written policy and procedures to secure the SMU from contraband.

In SPCs/CDFs, items allowed to enter these special housing units will be kept to an absolute minimum. When an item is allowed into the unit, it will be thoroughly inspected and searched to prevent the introduction of contraband. This includes laundry, commissary, food carts, personal property, etc. When it becomes necessary to introduce tools into a special housing unit, special care shall be taken. All tools shall be inventoried by the special housing officer prior to entering. Tools will be identified and checked against the inventory upon departing to ensure no tools, hazardous objects, or materials are left in the unit.

Every SMU entrance in regular use will have a sally port. The officer operating the inner door and the officer operating the outer door will coordinate their movements, so that one door has closed before the other opens. Each officer will check the identification of every person going in and out, independent of the other. Each must positively confirm the individual's identify before allowing him/her through the door.

Also, in accordance with written procedures established by the OIC, these officers will take precautions to ensure that the person requesting entry or exit is not doing so under duress.

Food carts will be securely locked before delivery to the SMU. If this is not possible, a staff escort is required.

b. Key Control

Staff assigned to the SMU or visiting area will have keys to the inner door(s) of the sally port, but not to the outside doors. Conversely, staff outside the SMU or visiting area will have keys to the sally port's outer, but not inner, door(s). Under no circumstances will one individual hold keys to both the inner and outer doors of the sally port.

5. Housing Units

Every OIC will establish written policy and procedures for housing unit and personal area searches.

a. Detainee Housing Area

Staff may search a detainee's housing area and personal items without prior notice, without detainee approval, and without the detainee present (the detainee's

presence is preferred, but not necessary). Housing area searches will take place irregularly, so as not to establish a pattern.

b. Detainee Property Locker or Cell Search

Staff will remove the detainee from the cell prior to the search. During a cell search, particular attention must be paid to plumbing facilities, ventilators, beds, bedding, tables, chairs, books, etc.

Staff conducting the cell/personal-property search will be on the alert for contraband in false bottoms, hidden compartments, hollow legs, etc. After the search, the officers will restore all items to the original order.

c. Search Log

Each housing unit, including the SMU, will document cell and area searches in a search log. The log will register the date, time, and findings, including location(s) where contraband found, type(s) of contraband, and the searching officers' names.

6. Utility Area Search.

Staff will conduct irregular searches of storage and supply rooms, plumbing accesses, walls (particularly around ventilators and windows), light and plumbing fixtures, drains, etc., in the housing areas. These searches will take place at least once per shift.

7. Shops and Buildings

Officers will routinely inspect all areas of the facility, at odd hours, according to no fixed schedule. The department head will be present during searches of medical areas, recreation areas, storerooms, etc., both to ease access to locked areas and to help determine the status of questionable items. Staff will document these searches in a logbook maintained by the SDEO or shift supervisor (at the OIC's discretion).

8. Perimeter Security

Inspections will occur frequently, but at irregular times, as follows:


- 1 Walls, fences, and exits, including all outside windows: inspected for defects at least once per shift; perimeter alarm systems: tested daily;
2. Places on the grounds where detainee could arrange to have visitors leave contraband/unauthorized items: per shift or daily, at OIC discretion; and

3. Perimeter fence, checked daily, with the officer:
 - a. Walking the entire fence line, checking the tension wire, binding straps, and all hardware attached to the poles, to ensure tautness; examining wings for cut links; and testing the links fastening the sides of the fence bottom to the fence; and
 - b. Simulating a detainee climbing the fence by pulling on the fence. Jerking the fence back and forth does not simulate climbing, and is therefore unacceptable. The pull-test will activate the alarm, after which staff will immediately notify the Control Center of the need to reset the alarm.
4. *The Maintenance Supervisor and CDEO or Chief of Security will check the fence monthly, documenting the results of each check in the SDEO's*

IV. AMERICAN CORRECTIONAL ASSOCIATION STANDARDS REFERENCED

American Correctional Association 3rd Edition, Standards for Adult Detention Facilities:
3-ALDF-5D-01, 5D-02, 5D-03, 5D-04, 5D-05, 5D-06, 5D-07, 5D-08


Approval of Standard



Michael D. Cronin
Acting Executive Associate Commissioner
Office of Programs

SEP 20 2000

Date



Michael A. Pearson
Executive Associate Commissioner
Office of Field Operations

SEP 20 2000

Date

**U.S. Immigration and Naturalization Service
NATIONAL DETENTION STANDARDS
MONITORING INSTRUMENT**

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.

SECURITY INSPECTIONS			
Components	Yes	No	Remarks
1. Does the facility have a comprehensive security inspection policy? If so does the policy specify: a. Posts to be inspected? b. Required inspection forms? c. Frequency of inspections? d. Guidelines for checking security features? e. Procedures for reporting weak spots, inconsistencies, and other areas needing improvement?			
2. Is every officer required to conduct a security check of his/her assigned area? a. Are results noted in the post logbook?			
3. Is documentation of security inspections kept on file?			
4. Has a single officer been assigned responsibility for ensuring the security inspection process covers all areas of the facility ?			
5. Do procedures ensure that recurring problems and a failure to take corrective action are reported to the appropriate manager?			
6. Does the front entrance have a sallyport-type entrance, with interlocking electronic doors or grilles?			
7. Does the front-entrance officer check the ID of everyone entering or exiting the facility?			
8. Are all visits officially recorded in a visitor logbook? a. If yes, what information is recorded?			

SECURITY INSPECTIONS

Components	Yes	No	Remarks
9. Does the Control Center maintain employee Personal Data Cards (Form G-74)?			
10. What information does the detainee-visitation log include?			
11. Does the facility have a visitor pass system? a. Color-coded?			
12. Does every Control Center officer receive specialized training?			
13. Is the Control Center staffed around the clock?			
14. Does policy restrict staff access to the Control Center?			
15. When do detainees have access to the Control Center? a. Are detainees assigned cleaning duties in the control center?			
16. Are communications centralized in the Control Center?			
17. Does the recall list include the current home telephone number of each employee? a. How often are phone numbers updated?			
18. Is it required that all staff make watch calls every half-hour between 6 PM and 6 AM? a. Who receives the watch calls?			
19. Does an officer monitor all vehicular traffic entering and leaving the facility?			
20. Does the facility maintain a log of all incoming and departing vehicles? If so, does each entry contain: a. The driver's name? b. Company represented? c. Vehicle contents? d. Delivery date and time? e. Date and time out? f. Vehicle license number? g. Name of employee responsible for the vehicle during the facility visit?			
21. Do officers thoroughly search each vehicle entering and leaving the facility?			

SECURITY INSPECTIONS

Components	Yes	No	Remarks
22. Is one individual responsible for vehicle supervision at the facility? a. If yes, is this assignment included in his/her post orders/job description?			
23. Does the facility have a written policy and procedures to prevent the introduction of contraband into the segregation units?			
24. Does the SMU officer inventory tools being taken into the facility?			
25. Does every regularly used SMU entrance have a sallyport?			
26. Does a staff member escort all food carts? a. Is a lock used to secure each food cart?			
27. Do written procedures govern searches of detainee housing units and personal areas?			
28. Do housing area searches occur at irregular times?			
29. Is every search of the SMU and other housing units documented?			
30. Do storage and supply rooms; walls, light and plumbing fixtures, accesses, and drains, etc. undergo frequent, irregular searches? a. How often?			
31. Is the logbook documenting area searches kept in the SDEO/shift supervisor's office?			
32. Are walls, fences, and exits, including exterior windows, inspected for defects once each shift?			
33. Do daily procedures include: a. Perimeter alarm system tests? b. Physical checks of the perimeter fence? c. Documenting the results in the SDEO/shift supervisor's daily log?			
34. Do the maintenance supervisor and CDEO/Chief of Security make monthly fence checks?			
35. Do visitation areas receive frequent, irregular inspections?			

**U.S. Immigration and Naturalization Service
NATIONAL DETENTION STANDARDS
MONITORING INSTRUMENT**

SECURITY INSPECTIONS

Verification Sources:

The following may serve as sources of information for auditors verifying the facility's compliance with this detention standard:

SOURCE	TIME	DATE	LOCATION
A. Observing inspection procedures			
B. Observing procedures at front entrance			
C. Reviewing logbooks			
D. Facility's written policy and procedures			
E. Detainee and staff interviews			

Facilities must complete the attached Plan of Action for bringing operations into compliance. For each element found out of compliance, the plan of action will specify remedial action and the estimated timetable for compliance.

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

Auditors Signature

Date