




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

March 1, 2018

MEMORANDUM TO: Tae Johnson
Assistant Director
Custody Management Division

FROM: Simona Flores 
Field Office Director
Philadelphia Filed Office

SUBJECT: Clinton County Correctional Facility – Waiver Request

Purpose

Approve a waiver for the Philadelphia Field Office, Allenwood ERO Sub-office, Clinton County Correctional Facility (CCCF) as it relates to 2000 NDS: Key and Lock Control (Security, Accountability, and Maintenance) Standard, wherein it states that, "All security officers shall successfully complete and approved locksmith-training program."

Background

In September of 2017 Clinton County Correctional Facility (CCCF) was inspected by the Nakamoto Group. As a result of this inspection, the following deficiency was noted: "No employee at this facility has attended an approved locksmith training program."

Discussion

The requirement for CCCF to comply with existing Standard as it relates to the opening of general correspondence was not addressed before. Prior inspection reports indicate that former staff members had some degree of training in this field. As there has been a lot of employee and leadership turnover since then, it is likely that those trained employees are no longer at Clinton County.

The facility currently utilizes existing maintenance staff to perform minor repairs throughout the facility to include locks and keys. If their maintenance staff cannot address an issue involving a lock or key, the facility will call in an outside vendor to repair the defect. This outside vendor is on 24 hour call, but there is not currently a contractual obligation to do so. The facility management has stated that they do not currently have the resources to provide training to a staff member as required by the standard and they advise that the current combination of the use of their own maintenance staff with the ability to have outside experts respond to the facility, has been adequate for their needs and meets the intent of the standard, in that a trained locksmith is available when needed.

Deficiency – Requirement for locksmith training

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Recommendation

I recommend the authorization of a waiver for CCCF relating to the 2000 NDS: Key and Lock Control (Security, Accountability, and Maintenance) Standard, as it relates to a facility employee receiving locksmith training.

Approve/date

gmb 7/3/13

Disapprove/date

Modify/date

Needs more discussion