



U.S. Immigration
and Customs
Enforcement

MEMORANDUM FOR: John Longshore
Field Office Director
Denver Field Office

FROM: (b)(6), (b)(7)(c)
Assistant Director for Custody Management

SUBJECT: Denver County Jail Annual Review

The annual review of the Denver County Jail conducted on October 11-13, 2011, in Denver, Colorado has been received. A final rating of Acceptable has been assigned and this review is closed.

The rating was based on the Lead Compliance Inspector (LCI) Summary Memorandum and supporting documentation. The Field Office Director must initiate the following actions in accordance with the Detention Management Control Program (DMCP):

- 1) The Field Office Director, Enforcement and Removal Operations, shall notify the facility within five business days of receipt of this memorandum. Notification shall include copies of the Form G-324A Detention Facility Review Form, the G-324A Worksheet, LCI Summary Memorandum, and a copy of this memorandum.

Should you or your staff have any questions regarding this matter, please contact

(b)(6), (b)(7)(c) Deputy Assistant Director, Detention Management Division at (202) 732- (b)(6), (b)(7)(c)

cc: Official File

MGT
OF AMERICA, INC.

601 13th Street, NW
Suite 650 North
Washington, DC 20005

Contract # HSCECR-09-C-00004

**ICE National Detention Standards
Compliance Review**

Facility: **Denver County Jail**
Inspection Date: October 11-13, 2011
Report Date: October 13, 2011

MGT
OF AMERICA, INC.

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Washington, DC 20005
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October 13, 2011

MEMORANDUM FOR: Gary E. Mead
Executive Associate Director
Office of Enforcement and Removal Operations

FROM: (b)(6), (b)(7)(c)
Lead Compliance Inspector

SUBJECT: Denver County Jail
Annual Detention Review (b)(6), (b)(7)(c)

MGT of America, Inc. performed an annual inspection for compliance with the Immigration and Customs Enforcement (ICE) National Detention Standards (NDS) at the Denver County Jail (DCJ) located in Denver, Colorado during the period of October 11-13, 2011. This facility is an Intergovernmental Service Agreement (IGSA).

The annual inspection was performed under the guidance of (b)(6), (b)(7)(c), Lead Compliance Inspector (LCI). Team members were:

Subject Matter Field	Team Member
Security	(b)(6), (b)(7)(c)
Medical Care	
Food Service	
Environmental Health and Safety	

Type of Review

This review was a scheduled annual inspection, which was performed to determine overall compliance with the ICE NDS for Over 72-hour facilities. The facility received a previous rating of "Acceptable" during the October 2010 inspection.

Review Summary

The facility is accredited by the American Correctional Association (ACA) and by the National Commission on Correctional Health Care (NCCHC). The facility is not accredited by the Joint Commission (TJC), formerly (JCAHO).

Standards Compliance

The following information is a summary of the standards reviewed and overall compliance as a result of the 2010 and 2011 NDS annual inspections.

2010 Inspection	
Compliant	34
Deficient	2
At-Risk	0
Repeat Deficiency	0
Not Applicable	2

2011 Inspection	
Compliant	32
Deficient	2
At-Risk	0
Repeat Deficiency	2
Not Applicable	2

LCI Issues and Concerns

Access to Legal Material: Repeat Deficiency

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

- The facility does not currently provide a designated law library for detainee use.
- The facility does not provide legal materials identified within Attachment A of this standard. At the time of this inspection, computer terminals available for detainee use were not programmed with the LexisNexis program.

Recommendation

It is recommended that the facility provide a law library for detainee use as specified in the standard. It is recommended that the facility provide detainees with access to legal materials as specified in Attachment A of this standard, or ICE detainees have access to the LexisNexis program.

Admission and Release: Repeat Deficiency

Policy: The procedures a facility follows in admitting and releasing detainees protect the health, safety, and welfare of each person. During the admissions process, detainees undergo screening for medical purposes; have their files reviewed for classification purposes; submit to a standard body search; and personally observe and certify the examination, categorization, inventorying, and safeguarding of all personal belongings. During the release process, detainees return clothing, bedding, and other facility-issued items; participate in identity-verification procedures; and complete documents in accordance with facility procedures, including certifying receipt of all inventoried personal property, including funds and valuables.

- All detainees received at the facility are strip searched as part of the admission process. Strip searches occur on intake as a matter of routine and are not based on provisions of probable cause as specified within the ICE protocol on searches of detainees. Strip searches are not conducted in a private area.

Recommendation

It is recommended that the facility adhere to ICE protocol regarding strip search of detainees.

Hold Rooms in Detention Facilities: Deficient

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

- The facility does not limit time spent in facility hold rooms to a maximum of 12 hours.
- The facility does not require hold rooms be irregularly monitored every 15 minutes or that unusual activity be logged. There are no logs maintained with regard to hold cell checks or activity.

Recommendation

It is recommended the facility establish policy, procedure, and practice providing for a maximum time in holding cells of 12 hours. Additionally, detainees in hold cells should be checked irregularly every 15 minutes and unusual behavior or complaints be noted.

Use of Force: Deficient

Policy: The use of force is authorized only after all reasonable efforts to resolve a situation have failed. Officers shall use as little force as 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 the security and orderly operation of the facility. Physical restraints shall be used to gain control of an apparently dangerous detainee only under specified conditions.

- Policy does not include language that supports a calculated approach instead of an immediate use of force.
- The written policy does not support a confrontation avoidance approach to potential use of force situations.
- Medical staff is not always consulted prior to the authorized use of non-lethal weapons. The detainee's medical file is not reviewed prior to calculated use of force using non-lethal weapons.
- (b)(7)(e) are routinely issued and used by staff at this facility. There is no current prohibition on the use of this equipment on ICE detainees.
- (b)(7)(e) are issued to staff at this facility for use during use of force situations. This item is currently not on the approved ICE list of non-lethal equipment, and there is no prohibition regarding use of these weapons on ICE detainees.
- Upon review of policy and staff training curriculums, the facility was previously utilizing a (b)(7)(e) as a permitted Use of Force option. This use of force technique is prohibited by this standard. Based on a 2010 incident at another County facility and pursuant to notification to all officers effective August 22, 2010, the use of this technique in use of force situations was suspended. The restraint technique is not currently being taught in the Use of Force curriculum. It should be noted the matter is under review by Denver County officials and a decision has not been made regarding future use of the technique.

Recommendation

It is recommended the facility establish policy, procedure, and practice that ensures that use of force on detainees is done in a manner that is consistent with the provisions of this standard.

Concern – Processing Fees:

Denver County charges a \$30.00 processing fee for all persons booked into the Denver County Jail or other jail facilities under county control. Staff interviews indicate this fee would also be charged to ICE detainees when they were processed into the Denver County Jail. It was also noted that the detainees are charged a co-payment of \$7.00 for designated medical services. Due to the fact that there were no ICE detainees housed at the facility for the previous 12 months it was not able to be determined if ICE detainees were charged a medical co-pay.

Recommended Rating and Justification

The LCI recommends the facility receive a rating of "Acceptable." Although there are four deficiencies (two repeats), the facility is compliant with 32 of the 36 applicable standards; two standards are not applicable.

LCI Assurance Statement

The findings of compliance and non-compliance are accurately and completely recorded on the G-324A Worksheet and are supported by documentation in the inspection file. An out brief was conducted at the facility. In addition to the entire inspection team, the following were present: Elias Diggins, Division Chief, Denver Sheriff's Department (DSD); (b)(6), (b)(7)(c), Nurse Manager, DSD; (b)(6), (b)(7)(c) Sergeant – Accreditation Manager, DSD; (b)(6), (b)(7)(c) Major, DSD; (b)(6), (b)(7)(c) Deputy Sheriff – Accreditation, DSD; (b)(6), (b)(7)(c) Major, DSD; (b)(6), (b)(7)(c) ICE Supervisory Detention and Deportation Officer; (b)(6), (b)(7)(c) ICE Immigration Enforcement Agent; and (b)(6), (b)(7)(c) Sergeant, DSD.

(b)(6), (b)(7)(c) LCL MGT
Printed Name/Title

October 13, 2011
Date

Signature: _____

Department Of Homeland Security
Immigration and Customs Enforcement

Detention Facility Inspection Form
Facilities Used Over 72 hours

A. Type of Facility Reviewed

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

B. Current Inspection

Type of Inspection
☐ Field Office ☒ HQ Inspection
Date[s] of Facility Review
October 11-13, 2011

C. Previous/Most Recent Facility Review

Date[s] of Last Facility Review
October 26-28, 2010
Previous Rating
☐ Superior ☐ Good ☒ Acceptable ☐ Deficient ☐ At-Risk

D. Name and Location of Facility

Name
Denver County Jail
Address (Street and Name)
10500 East Smith Road
City, State and Zip Code
Denver, Colorado 80201
County
Denver
Name and Title of Chief Executive Officer (Warden/OIC/Supt.)
(b)(6), (b)(7)(c) Chief
Telephone # (Include Area Code)
720-943-6161 (b)(6), (b)(7)(c)
Field Office / Sub-Office (List Office with oversight responsibilities)
Denver
Distance from Field Office
15 miles

E. ICE Information

Name of LCI (Last Name, Title and Duty Station)
(b)(6), (b)(7)(c) LCI / MGT of America, Inc.
Name of Team Member / Title / Duty Location
(b)(6), (b)(7)(c) CI-Medical Care / MGT of America, Inc.
Name of Team Member / Title / Duty Location
(b)(6), (b)(7)(c) CI-Security / MGT of America, Inc.
Name of Team Member / Title / Duty Location
(b)(6), (b)(7)(c) CI-Environmental Health and Safety and Food Service / MGT of America, Inc.

F. CDF/IGSA Information Only

Contract Number Den-99-7044	Date of Contract or IGSA 11/03/1998
Basic Rates per Man-Day \$70.20	
Other Charges: (If None, Indicate N/A) N/A	
Estimated Man-days Per Year: 0	

G. Accreditation Certificates

List all State or National Accreditation[s] received:
American Correctional Association 2009
National Commission on Correctional Health Care 2011
☐ 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
☐ Court Order ☐ Class Action Order
The Facility has Significant Litigation Pending
☐ Major Litigation ☐ Life/Safety Issues
☒ Check if None.

I. Facility History

Date Built
1954
Date Last Remodeled or Upgraded
2009 Production Kitchen
Date New Construction / Bed space Added
Under Current 256 Bed Construction
Future Construction Planned
☒ Yes ☐ No Date:
Current Bed space
913
Future Bed space (# New Beds only)
Number: 256 Date: Spring 2012

J. Total Facility Population

Total Facility Intake for previous 12 months
13,876
Total ICE Man-days for Previous 12 months
0

K. Classification Level (ICE SPCs and CDFs Only)

	L-1	L-2	L-3
Adult Male			
Adult Female			

L. Facility Capacity

	Rated	Operational	Emergency
Adult Male	533	533	693
Adult Female	380	380	425
<input checked="" type="checkbox"/> Facility holds Juveniles Offenders 16 and older as Adults			

M. Average Daily Population

	ICE	USMS	Other
Adult Male	0	0	610
Adult Female	0	0	269

N. Facility Staffing Level

Security: (b)(7)(e) Support:

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Significant Incident Summary Worksheet

For ICE to complete its review of your facility, the following information must be completed prior to the scheduled review dates. The information on this form should contain data for the past twelve months in the boxes provided. The information on this form is used in conjunction with the ICE Detention Standards in assessing your Detention Operations against the needs of the ICE and its detained population. This form should be filled out by the facility prior to the start of any inspection. Failure to complete this section will result in a delay in processing this report and the possible reduction or removal of ICE' detainees at your facility.

<i>Incidents</i>	<i>Description</i>	Jan – Mar	Apr – Jun	Jul – Sept	Oct – Dec
Assault: Offenders on Offenders ¹	Types (Sexual ² , Physical, etc.)	P	5S/7P	4S/10P	2S/5P
	With Weapon	0	0	0	0
	Without Weapon	3	12	14	7
Assault: Detainee on Staff	Types (Sexual Physical, etc.)	0	P	P	P
	With Weapon	0	0	0	0
	Without Weapon	0	4	1	1
Number of Forced Moves, incl. Forced Cell moves ³		0	1	0	0
Disturbances ⁴		0	0	0	0
Number of Times Chemical Agents Used		0	1	0	0
Number of Times Special Reaction Team Deployed/Used		0	0	0	0
# Times Four/Five Point Restraints applied/used	Number/Reason (M=Medical, V=Violent Behavior, O=Other)	0	1/M	2/M	1/M
	Type (C=Chair, B=Bed, BB=Board, O=Other)	0	C	C	C
Offender / Detainee Medical Referrals as a result of injuries sustained.		3	3	3	1
Escapes	Attempted	0	0	0	0
	Actual	8	1	2	0
Grievances:	# Received	250	209	212	295
	# Resolved in favor of Offender/Detainee	54	63	33	47
Deaths	Reason (V=Violent, I=Illness, S=Suicide, A=Attempted Suicide, O=Other)	0	0	O	S
	Number	0	0	1	1
Psychiatric / Medical Referrals	# Medical Cases referred for Outside Care	417	385	387	364
	# Psychiatric Cases referred for Outside Care	17	3	0	11

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

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

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

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

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Form G-324A SIS (Rev. 7/9/07)

ICE 2012 FOIA03030.016257

DHS/ICE Detention Standards Review Summary Report						
1. Acceptable 2. Deficient 3. At Risk 4. Repeat Finding 5. Not Applicable						
Detainee Services		1.	2.	3.	4.	5.
1.	Access to Legal Materials	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
2.	Admission and Release	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
3.	Classification System	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4.	Correspondence and Other Mail	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5.	Detainee Handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6.	Food Service	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7.	Funds and Personal Property	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8.	Detainee Grievance Procedures	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9.	Group Presentation On Legal Rights	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10.	Issuance of Clothing, Bedding and Towels	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11.	Marriage Requests	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12.	Non-Medical Emergency Escorted Trips	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13.	Recreation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14.	Religious Practices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15.	Access to Telephones	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16.	Visitation	<input checked="" 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"/>
Health Services						
18.	Hunger Strikes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19.	Access to Medical Care	<input checked="" 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"/>	
21.	Terminal Illness, Advanced Directives and Death	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Security and Control						
22.	Contraband	<input checked="" 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"/>	
24.	Disciplinary Policy	<input checked="" 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"/>	
26.	Environmental Health and Safety	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
27.	Hold Rooms in Detention Facilities	<input type="checkbox"/>	<input checked="" 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"/>	
29.	Population Counts	<input checked="" 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"/>	
31.	Security Inspections	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
32.	Special Management Units (Administrative Segregation)	<input checked="" 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"/>	
34.	Tool Control	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
35.	Transportation (Land Transportation)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
36.	Use of Force	<input type="checkbox"/>	<input checked="" 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"/>	
38.	Detainee Transfer (Added September 2004)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

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

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LCI Review Assurance Statement

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

LEAD COMPLIANCE INSPECTOR	
Lead Compliance Inspector: (Print Name)	Signature
(b)(6), (b)(7)(c)	(b)(6), (b)(7)(c)
Title & Duty Location	Date
LCI, MGT of America, Inc.	October 13, 2011

TEAM MEMBERS	
Print Name, Title, & Duty Location	Print Name, Title, & Duty Location
(b)(6), (b)(7)(c) CI-Medical Care, MGT of America, Inc.	(b)(6), (b)(7)(c) CI-Security, MGT of America, Inc.
Print Name, Title, & Duty Location	Print Name, Title, & Duty Location
(b)(6), (b)(7)(c) CI-Environmental Health and Safety & Food Service, MGT of America, Inc.	

Recommended Rating:

- ☐ Superior
☐ Good
☒ Acceptable
☐ Deficient
☐ At-Risk

Comments:

This is a 913-bed facility holding offenders classified as low or medium security. The facility holds adult male and female detainees as well as both male and female juveniles between the ages of 14 and 18. Juveniles are held at the facility if the District Attorney adjudicates the juvenile as an adult offender. The facility keeps adults physically separated from juveniles. There was one non-ICE juvenile held at the facility during the time of the inspection. ICE staff indicated they will not place juveniles at the facility under any circumstance. There have been no ICE detainees held at the facility during this past reporting period. While there are detainees at the facility with ICE holds, they are being held at the facility under separate charges. Once a non-ICE detainee with a hold from ICE has satisfied his obligation of state or county charges, ICE is notified and removes the detainee from the facility. The facility is undergoing extensive renovation and expects to add 256 beds as a result of new construction. A review of statistics provided by the facility reflects the following:

The facility reported 11 offender on offender sexual assaults. A review of incident reports and interviews with staff reflect that none of the cases involved ICE detainees. There were no injuries or criminal charges involved. Incidents included detainees exposing themselves, inappropriate touching, and consensual sexual contact between two female detainees. None of the incidents were considered serious and none warrant further discussion or explanation for purposes of this review.

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The facility reported six offender assaults on staff. A review of the incident reports reflect that none of the incidents involved an ICE detainee. The staff assaults occurred as follows:

November 22, 2010: Use of force was being utilized by staff to place a non-ICE female detainee into a suicide watch cell in the medical unit. During the use of force the subject punched an officer in the face. The officer reported a swollen lip and an abrasion on her right cheek. The detainee was not criminally charged and received administrative discipline via the detainee disciplinary process.

May 2, 2011: During intake processing a non-ICE female detainee was being strip searched. During processing, the subject pulled a crack pipe from her bra and threw it at an officer. There was no injury reported. Subject was charged with assault and related drug offenses for introduction of narcotics and received 20 additional days on her sentence.

May 19, 2011: A female non-ICE detainee was disruptive, and security staff physically restrained her. During restraint, she bit an officer's hand breaking the skin. Subject was charged with assault, resisting, and fighting. The adjustment board found the detainee guilty and imposed disciplinary sanctions. The injury to the staff member was not serious. The detainee was not criminally charged and received administrative discipline via the detainee disciplinary process.

June 2, 2011: A male non-ICE detainee was being disruptive and staff exercised physical restraint to gain control of the subject. The detainee was charged with assault for incidental contact during the use of force. There were no staff injuries reported as a result of the assault. The detainee was not criminally charged and received administrative discipline via the detainee disciplinary process.

June 16, 2011: A male non-ICE detainee was ordered to surrender his ID card by an officer. The detainee threw his ID at the officer hitting him in the chest. There was no injury reported. The detainee was not criminally charged and received administrative discipline via the detainee disciplinary process.

September 29, 2011: A non-ICE male detainee was involved in a possible fight with another non-ICE detainee. An officer attempted to remove the first detainee from the scene (dietary) to send him back to the unit. The officer noticed initials in the detainee's haircut and ordered him to remove the initials. The detainee became violent and charged the officer. The officer restrained the detainee and another staff member assisted in cuffing and securing the subject. No injuries were reported. The detainee was not criminally charged and received administrative discipline via the detainee disciplinary process.

The facility reports 11 escapes this past reporting period. A review of incident reports and interviews with staff reflect that none of the cases involved escape from secure confinement or escort. All cases were related to the community correctional component of the facility and involved late returns from unescorted day furloughs or failure to report in a timely manner. Given this broad definition of escape, a case by case description of each occurrence is not relevant to this review process. Records and reports provided show that there have been no escapes from the secure perimeter of the facility or escorted transport during this past reporting period. ICE detainees would not be part of the community correctional component of the facility.

There were two detainee deaths reported by the facility during this past reporting period. It should be noted that as each of these deaths involved non-ICE detainees, a review of respective medical files could not be conducted. A brief narrative account follows:

A 51 year old white male (non-ICE detainee), admitted to the facility on November 19, 2010, with no prior history, was found hanging in his cell on November 23, 2010. He was cut down and resuscitation attempts were begun. Emergency Medical Services arrived, assumed care of the detainee and transported him to Denver Health Medical Center, where he was later pronounced dead.

A 53 year old Hispanic male (non-ICE detainee) was pronounced dead at Denver Health Medical Center on September 16, 2011. He had a history of hepatitis C, alcohol abuse, anemia, cirrhosis of the liver, portal hypertension and upper gastro-intestinal (GI) bleed. Shortly before his death he had been admitted to the hospital after a GI bleed, and was treated and released back to the facility. He was returned to the hospital after suffering another bleed and died there.

With regard to special issues for ICE the following is submitted:

(b)(7)(E) The facility issues (b)(7)(e) to staff. Policy and procedure guide (b)(7)(e) There is no prohibition regarding use of (b)(7)(e) on ICE detainees.

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Canine: The Sheriff's office maintains a canine unit and uses it routinely for searches of detainee living and activity areas. While there is no specific prohibition of using the canine unit in proximity to ICE detainees; all detainees are removed from an area prior to introduction of the canine unit.

Condition of Confinement Review Worksheet
(This document must be attached to each G-324A Inspection Form)
This Form to be used for Inspections of all Facilities Used Over 72 Hours



ICE Detention Standards Review Worksheet

- ☒ Local Jail – IGSA
☐ State Facility – IGSA
☐ ICE Contract Detention Facility

Name <i>Denver County Jail</i>
Address (Street and Name) <i>10500 East Smith Road</i>
City, State and Zip Code <i>Denver, CO 80201</i>
County <i>Denver</i>
Name and Title of Chief Executive Officer (Warden/OIC/Superintendent) (b)(6), (b)(7)(c) <i>Chief</i>
Name and Title of Lead Compliance Inspector (b)(6), (b)(7)(c) <i>Lead Compliance Inspector</i>
Date[s] of Review <i>From October 11 to 13, 2011</i>
Type of Review <input checked="" type="checkbox"/> Headquarters <input type="checkbox"/> Operational <input type="checkbox"/> Special Assessment <input type="checkbox"/> Other

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HOLD ROOMS IN DETENTION FACILITIES	
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POPULATION COUNTS	
POST ORDERS	
SECURITY INSPECTIONS	
SPECIAL MANAGEMENT UNIT (ADMINISTRATIVE SEGREGATION)	
SPECIAL MANAGEMENT UNIT (DISCIPLINARY SEGREGATION)	
TOOL CONTROL	
TRANSPORTATION (LAND)	
USE OF FORCE	
STAFF/DETAINEE COMMUNICATIONS	
DETAINEE TRANSFER STANDARD	

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

DETAINEE SERVICES STANDARDS

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	YES	NO	NA	REMARKS
The facility provides a designated law library for detainee use.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The facility is currently undergoing significant renovation and the main law library has been closed in the process. The facility provides computer terminals in each living area programmed with West Law.
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The facility does not have all materials listed in Attachment A of this standard.
The library contains a sufficient number of chairs, is well lit, and is reasonably isolated from noisy areas.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There is currently no general or law library at this facility. There is one computer terminal and one chair serving 40 to 60 detainees in each housing unit dayroom for access to legal materials.
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"/>	While there is no designated law library, detainees have access to one computer terminal in each housing unit programmed with West Law during dayroom hours. The computers have word processing capabilities. Documents can be printed out in the living unit control areas.
In addition to the physical law library, detainees have access to the Lexus Nexus electronic law library.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The facility has been provided disks with which to program computer terminals with the LexisNexis program. Facility staff and the Immigration Enforcement Agent (IEA) assigned to the facility indicated technical difficulties have prevented the facility from programming the computers.
Where provided, the Lexus Nexus library is updated and is current.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The LexisNexis programming disks provided have not been installed on the computer terminals due to technical difficulties.
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"/>	Another county jail facility under jurisdiction of the Denver County Sheriff maintains legal reference materials that may be made available upon request. This inspector interviewed the Sergeant in charge of legal materials at the other facility via telephone.
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"/>	
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"/>	While there is no designated law library, detainees have access to a computer terminal within the housing unit dayroom programmed with West Law. Dayrooms are open from 8:00 AM until 9:00 PM daily except count time.
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"/>	Requests for specific legal material may be made to the Deputy Sheriff in charge of legal materials. Requests are processed in a timely manner.

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	YES	NO	NA	REMARKS
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"/>	
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees may retain a reasonable amount of personal legal material in the general population and in the special management unit. Stored legal materials are accessible within 24 hours of a written request.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There currently is no law library at this facility. There have been no denials of legal materials to detainees within this past reporting period.
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

REMARKS:

This inspector reviewed facility policy and procedure, reviewed the detainee handbook, interviewed facility staff, interviewed ICE staff, inspected living areas, and checked computer terminals designated for detainee use within living areas. The facility law library has been closed indefinitely for extensive facility renovation. Computer terminals are available on each living unit and are programmed with West Law. There is a provision to receive legal materials via written request.

The facility does not currently provide a designated law library for detainee use.

The facility does not provide legal materials identified within Attachment A of this standard. At the time of this inspection, computer terminals available for detainee use were not programmed with the LexisNexis program.

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ADMISSION AND RELEASE

POLICY: ALL DETAINEES WILL BE ADMITTED AND RELEASED IN A MANNER THAT ENSURES THEIR HEALTH, SAFETY, AND WELFARE. THE ADMISSIONS PROCEDURE WILL, AMONG OTHER THINGS INCLUDE: MEDICAL SCREENING; A FILE-BASED ASSESSMENT AND CLASSIFICATION PROCESS; A BODY SEARCH; AND A SEARCH OF PERSONAL BELONGINGS, WHICH WILL BE INVENTORIED, DOCUMENTED, AND SAFEGUARDED AS NECESSARY.

COMPONENTS	YES	NO	NA	REMARKS
In-processing includes an orientation 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 section of the component that requires the following topics to be included in the detainee orientation is specific to SPCs or CDFs: 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; and sick call procedures. A video is shown that covers all indicated areas with the exception of how to contact ICE and count procedures. The video is in English only. If an ICE detainee is admitted to the facility, ICE provides him or her with an ICE National Detainee Handbook and provides information on how to contact ICE. The facility also issues all detainees a local detainee handbook that is available in either English or Spanish.
Medical screenings are performed by medical staff <u>or</u> 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"/>	Medical staff conducts comprehensive intake medical screenings.
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"/>	The classification process is inclusive of both criminal history and threat level.
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Based on observations and staff interviews, it was determined that all detainees received at the facility are strip searched regardless of reasonable suspicion. Strip searches are conducted by an officer of the same sex as the detainee.
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Strip searches occur on intake as a matter of routine and are not based on provisions of probable cause as specified within the ICE protocol on searches of detainee.
The "Contraband" standard governs all personal property searches. IGSAs/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"/>	
Staff completes Form I-387 or similar form for CDFs and IGSAs 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"/>	Staff would submit an incident report if advised of lost or missing property. If the loss involved an ICE detainee, ICE will be notified. There have been no such incidents this past reporting period.

ADMISSION AND RELEASE

POLICY: ALL DETAINEES WILL BE ADMITTED AND RELEASED IN A MANNER THAT ENSURES THEIR HEALTH, SAFETY, AND WELFARE. THE ADMISSIONS PROCEDURE WILL, AMONG OTHER THINGS INCLUDE: MEDICAL SCREENING; A FILE-BASED ASSESSMENT AND CLASSIFICATION PROCESS; A BODY SEARCH; AND A SEARCH OF PERSONAL BELONGINGS, WHICH WILL BE INVENTORIED, DOCUMENTED, AND SAFEGUARDED AS NECESSARY.

COMPONENTS	YES	NO	NA	REMARKS
Detainees are issued appropriate and sufficient clothing and bedding for the climatic conditions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainees are issued socks and/or underwear if they have none of their own. Detainees are issued one jump suit. Issuance of bedding is acceptable.
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"/>	
All releases are properly coordinated with ICE using a Form I-203.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. There have been no ICE detainees housed at this facility in the past year. According to ICE staff, a Form I-203 is used to coordinate the release of an ICE detainee.
Staff completes paperwork/forms for release as required.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input type="checkbox"/> ACCEPTABLE <input checked="" type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input checked="" type="checkbox"/> REPEAT FINDING				

REMARKS:

Detainees received at this facility are first processed through another county detention facility in the City of Denver where they go through the booking process, are medically screened, and are classified for housing. Upon receipt at this facility, detainees are again medically screened by medical staff and their classification information is verified by a classification officer. The classification system used is a five-tier system based on objective criteria. The facility is deficient with regard to this standard due to the following concern:

All detainees received at the facility are strip searched as part of the admission process. Strip searches occur on intake as a matter of routine and are not based on provisions of probable cause as specified within the ICE protocol on searches of detainee. Strip searches are not conducted in a private area.

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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	YES	NO	NA	REMARKS
The facility has a system for classifying detainees. In CDFs and IGSA's, an Objective Classification System or similar is used.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility has an objective classification system for determining threat levels of detainees.
The facility classification system includes: <ul style="list-style-type: none"> Classifying detainees upon arrival; Separating from the general population those individuals who cannot be classified upon arrival; and The first-line supervisor or designated classification specialist reviewing every classification decision. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The intake/processing officer reviews work-folders, A-files, etc., to identify and classify each new arrival.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	While there have been no ICE detainees booked within this past reporting period, ICE advises they will provide necessary documentation to assist the identification and classification process as required by the standard. It should be noted intake processing occurs at a separate facility in Denver prior to admission to this facility.
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"/>	Policy, procedure, and staff interviews support compliance with this component.
Housing assignments are based on classification-level.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A detainee's classification-level does not affect his/her recreation opportunities. Detainees recreate with persons of similar classification designations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainee work assignments are based upon classification designations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The classification process includes reassessment/reclassification. At IGSA's, detainees may request reassessment 60 days after arrival.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainees may request reassessment of their classification level at any time via written request to the classification officer.
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 portion of this component that states that a designated supervisor or classification specialist has the authority to reduce a classification-level on appeal is specific to SPCs and CDFs. Only classification officers review detainee requests regarding classification appeals and have the authority to reduce classification levels in a manner consistent with the classification plan.
Classification appeals are resolved within five business days and detainees are notified of the outcome within 10 business days.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Classification officers review requests upon receipt and generally respond on the same day. The facility does not track timeframes with regard to such requests.
Classification designations may be appealed to a higher authority, such as the Warden or equivalent.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Detainees may appeal classification decisions to the highest ranking detention official (Director of Corrections).
The Detainee Handbook or equivalent for IGSA's explains the classification levels, with the conditions and restrictions applicable to each.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The detainee handbook does not contain information regarding conditions and restrictions of each classification level.

CLASSIFICATION SYSTEM

POLICY: ALL FACILITIES WILL DEVELOP AND IMPLEMENT A SYSTEM ACCORDING TO WHICH ICE DETAINEES ARE CLASSIFIED. THE CLASSIFICATION SYSTEM WILL ENSURE THAT EACH DETAINEE IS PLACED IN THE APPROPRIATE CATEGORY, PHYSICALLY SEPARATED FROM DETAINEES IN OTHER CATEGORIES

COMPONENTS	YES	NO	NA	REMARKS
<input checked="checked" type="checkbox"/> ACCEPTABLE	<input type="checkbox"/> DEFICIENT	<input type="checkbox"/> AT-RISK	<input type="checkbox"/> REPEAT FINDING	

REMARKS:

The facility has a classification plan that relies on objective information to assign classification levels to detainees. Initial classification is conducted at a separate detention facility in the City of Denver that is part of the county jail system. Detainees identified for placement to this facility (Denver County Jail) are then transported here accordingly. Classification officers at this facility check the classification decision during the intake process. The facility classification process serves to keep detainees of different threat levels separate during housing, recreation, and work. Detainees may request a review of their reclassification for possible reduction via written request.

The detainee handbook does not contain information regarding conditions and restrictions of each classification level.

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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 portion of this component requiring correspondence rules to be posted in the housing unit or common area is specific to SPCs and CDFs. Correspondence rules are not posted in living units or other common areas. Correspondence rules are provided to each detainee via a detainee handbook.
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"/>	
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Written facility policy allows 48 hours for delivery of outgoing mail to the postal service.
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 Chief Administrative Officer of the facility (Director of Corrections) has issued policy and procedure authorizing inspection of incoming mail without the detainee present. The authorization is based on prevailing security reasons specified within the procedure.
Staff does not read incoming general correspondence without the Warden's prior written approval.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. All incoming correspondence is subject to being read as authorized within facility policy and procedure.
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"/>	Special correspondence is opened only in the presence of the detainee.
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"/>	Outgoing mail is not inspected absent security concerns and only as authorized by a higher authority.
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 requirement for the official authorizing the rejection of incoming mail to send written notice to the sender is specific to SPCs and CDFs. Written notice is documented on a three-part form. One copy filed, one copy is sent to the sender, and the third copy is sent to the addressee.
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"/>	

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 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"/>	
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"/>	While there have been no instances of receiving identity documents during the past reporting period, interviews with facility staff and ICE staff support compliance with this component.
Staff provides the detainee a copy of his/her identity document(s) upon request.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	ICE would provide a copy of the identity document upon request.
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 IGSAs.	<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"/>	All outgoing legal mail is sent at county expense.
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"/>	Detainees may send an unlimited number of mailings if they bear the expense.
The facility provides writing paper, envelopes, and pencils at no cost to ICE detainees.	<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:

This inspector reviewed facility policy and procedure, inspected the mail room, interviewed the mail room officer, and reviewed forms utilized to process detainee mail. The facility demonstrates an acceptable level of compliance with this standard and is rated accordingly.

Facility policy and procedure allows 48 hours for delivery of outgoing mail to the postal service, rather than 24 hours stipulated in the detention standard.

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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	YES	NO	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 facility handbook is written in English and translated into Spanish. Both renditions of the handbook were reviewed during the inspection.
The handbook is supplemented by the facility orientation video, where one is provided.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The handbook is supplemented by an orientation video which is available in English.
All staff members receive a handbook and training regarding the handbook contents.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility staff receives training on the handbook during pre-service training. A copy of the handbook is available to staff at each post.
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"/>	The handbook is currently under revision as new policies and procedures are being promulgated to address the opening and operation of the new jail downtown.
There an annual review of the handbook by a designated committee or staff member.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The handbook has not been reviewed annually.
The detainee handbook addresses the following issues: <ul style="list-style-type: none"> Personal Items permitted to be retained by the detainee; and Initial issue of clothes, bedding and personal hygiene items. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The detainee handbook states in clear language the basic detainee responsibilities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook clearly outlines the methods for classification of detainees, explains each level, and explains the classification appeals process.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Levels of classification are not explained in the handbook nor are the processes for the appeal of a detainee's classification.
The handbook states when a medical examination will be conducted.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The handbook does not address when a medical examination will be conducted.
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The handbook does not address clothing exchange schedules or procedures for washing and drying clothes on the housing unit.
The handbook describe times and procedures for obtaining disposable razors, and allows that detainees attending court will be afforded the opportunity to shave first.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes barber hours and hair cutting restrictions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Barbering guidelines are addressed in the medical section of the handbook.
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"/>	
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"/>	

DETAINEE HANDBOOK

POLICY: EVERY OIC WILL DEVELOP A SITE-SPECIFIC DETAINEE HANDBOOK TO SERVE AS AN OVERVIEW OF, AND GUIDE TO, THE DETENTION POLICIES, RULES, AND PROCEDURES IN EFFECT AT THE FACILITY. THE HANDBOOK WILL ALSO DESCRIBE THE SERVICES, PROGRAMS, AND OPPORTUNITIES AVAILABLE THROUGH VARIOUS SOURCES, INCLUDING THE FACILITY, ICE, PRIVATE ORGANIZATIONS, ETC. EVERY DETAINEE WILL RECEIVE A COPY OF THIS HANDBOOK UPON ADMISSION TO THE FACILITY.

COMPONENTS	YES	NO	NA	REMARKS
The handbook describes the detainee voluntary work program.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	All detainees capable of working are required to work by Colorado statutes. This requirement is addressed in the handbook; however, the detainee volunteer work program is not further described in the handbook.
The handbook describes the library location and hours of operation, and law library procedures and schedules.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The library has been closed for renovation. Procedures for obtaining reading and legal materials are not described in the detainee handbook.
The handbook describes attorney and regular visitation hours, policies, and procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Attorney and regular visitation hours are described in detail in the handbook.
The handbook describes the facility contraband policy.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The handbook describes the facility visiting hours and schedule, and visiting rules and regulations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Attorney and regular visitation hours are described in detail in the handbook.
The handbook describes the correspondence policy and procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The correspondence policy and procedure for the facility is described in detail in the handbook.
The handbook describes the detainee disciplinary policy and procedures, including: <ul style="list-style-type: none"> Prohibited acts and severity scale sanctions; Time limits in the Disciplinary Process; and Summary of the Disciplinary Process. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The handbook describes the disciplinary policy and procedures as well as the detainee's rights and responsibilities in detail.
The grievance section of the handbook explains all steps in the grievance process – Including: <ul style="list-style-type: none"> Informal (if used) and formal grievance procedures; The appeals process; In CDF facilities: procedures for filing an appeal of a grievance with ICE. Staff/detainee availability to help during the grievance process. Guarantee against staff retaliation for filing/pursuing a grievance. How to file a complaint about officer misconduct with the Department of Homeland Security. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The handbook does not address a guarantee against staff retaliation against a detainee for filing a grievance nor does it provide direction to the detainee on how to file a complaint about officer misconduct with the Department of Homeland Security.
The detainee handbook describes the medical sick call procedures for general population and segregation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Medical sick call procedures are clearly described in the handbook.
The handbook describes the facility recreation policy including: <ul style="list-style-type: none"> Outdoor recreation hours. Indoor recreation hours. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility's policy for indoor and outdoor recreation is addressed in the handbook.
The handbook describes the detainee dress code for daily living; and work assignments.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The detainee dress code is described in the handbook.
The handbook specifies the rights and responsibilities of all detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Rights and responsibilities of detainees are clearly described in the handbook.
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

Facility staff state the handbook is currently under revision. The current handbook addresses most of the topics required by the standard but still needs to be revised to address additional topics.

The handbook is not reviewed annually as required. Staff report the last revision of the handbook was completed approximately five years ago.

The handbook does not address each classification level nor does it address when medical evaluations will be conducted.

The handbook does not address clothing exchange schedules or the use of washing machines and dryers on the housing units.

The detainee volunteer work program is not addressed in the handbook.

The location of the library, hours of operation of the library and the law library procedures are not addressed.

The grievance section of the library does not address a guarantee against staff retaliation against a detainee for filing a grievance nor does it provide direction to the detainee on how to file a complaint about officer misconduct with the Department of Homeland Security.

(b)(6), (b)(7)(c) / Oc

AUDITOR'S SIGNATURE

(b)(6), (b)(7)(c)

FOOD SERVICE

POLICY: EVERY FACILITY WILL PROVIDE DETAINEES IN ITS CARE WITH NUTRITIOUS AND APPETIZING MEALS, PREPARED IN ACCORDANCE WITH THE HIGHEST SANITARY STANDARDS.

COMPONENTS	YES	NO	NA	REMARKS
The food service program is under the direct supervision of a professionally trained and certified 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 Acting Food Service Manager (FSM) and the Food Service Supervisor are both ServSafe certified. The responsibilities of food service personnel are in writing and the FSM determines the responsibilities of food service personnel.
The Cook Supervisor is on duty on days when the FSA is off duty and vice versa.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. The Food Service Supervisor is on duty when the FSM is off and vice versa.
The FSA provides food service employees with training that specifically addresses detainee-related issues. <ul style="list-style-type: none"> In ICE Facilities this includes a review of the ICE "Food Service" standard 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Knife cabinets close with an approved locking device, and the on-duty cook foreman maintains control of the key that locks the device.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Knife and kitchen tool cabinets are maintained in several areas of the food service operation. Each cabinet is locked and items in the cabinet are maintained on a shadow board. The keys are maintained under the control of the on-duty supervisor.
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"/>	The section of this component requiring staff to monitor the condition of knives and dining utensils is specific to SPCs and CDFs. When not securely stored, knives are secured to a workstation and used under the direct supervision of staff. The condition of all knives and other kitchen utensils maintained in the locked cabinets is monitored by food service personnel.
When necessary, special procedures govern the handling of food items that pose a security threat.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Food items which pose a security threat, such as yeast, are not maintained in pure form in the food service area.
Operating procedures include daily searches (shakedowns) of detainee work areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Food service personnel conduct a daily walk-through of the food service areas daily.
The FSA monitors staff implementation of the facility's population counts procedures. Staff is trained in count procedures.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Correctional officers are responsible for all counts of non-ICE detainees working in the food service program.
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"/>	Observation of the non-ICE detainees working in the food service program indicates they are groomed and clothed appropriately.
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 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"/>	The instruction of newly assigned non-ICE detainee workers in the rules and procedures of the food service operation is documented.

FOOD SERVICE

POLICY: EVERY FACILITY WILL PROVIDE DETAINEES IN ITS CARE WITH NUTRITIOUS AND APPETIZING MEALS, PREPARED IN ACCORDANCE WITH THE HIGHEST SANITARY STANDARDS.

COMPONENTS	YES	NO	NA	REMARKS
During orientation and training session(s), the CS explains and demonstrates: <ul style="list-style-type: none"> Safe work practices and methods; Safety features of individual products/pieces of equipment; and Training covers the safe handling of hazardous material[s] the detainees are likely to encounter in their work. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The elements of this component are met in the training program provided to non-ICE detainees working in the food service operation. The training is provided and documented by the Food Service Supervisor.
The Cook Supervisor documents all training in individual detainee detention files.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A master file of all training provided to non-ICE detainee workers is maintained in the food service area. These documents are not filed in the detainee's individual detention file.
Detainees at CDFs are paid in accordance with the "Voluntary Work Program" standard. Detainee workers at IGSA's are subject to local and state rules and regulations regarding detainee pay.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The requirement for detainees to be paid in accordance with the "Voluntary Work Program" standard is specific to SPCs and CDFs. By Colorado Statute, all jail inmates are required to work while in custody. Detainee workers are not paid at this facility.
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"/>	
For cafeteria style operations, a transparent "sneeze guard" protects both the serving line and salad bar line.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This facility does not utilize cafeteria-style serving.
The facility has a standard 35-day menu cycle. IGSA's use a 35 day or similar system for rotating meals.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The section of this component requiring a 35-day menu cycle is specific to SPCs and CDFs. The facility utilizes a standard 28-day menu cycle.
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 28-day menu includes such items as burritos, green chilies, casseroles and goulash to meet the need for ethnic diversity.
A registered dietitian conducts a complete nutritional analysis of every master-cycle menu planned.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The 28-day menu is approved by a certified dietitian. The credentials of the dietitian were reviewed during the inspection.
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"/>	All master-cycle menu items are prepared in compliance with master recipes. Food service supervisors provide direct supervision of the preparation of all meals to ensure the preparations follow the recipe.
The Cook Foreman has the authority to change menu items if necessary. <ul style="list-style-type: none"> If yes, documenting each substitution, along with its justification With copy to FSA 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The standard requires the "Cook Supervisor or equivalent" as having this authority. The food service supervisor has the authority to change a menu item if it is necessary. If a change is made it is documented with the documentation forwarded to the FSM.
All staff and volunteers know and adhere to written "food preparation" procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All master-cycle menu items are prepared in compliance with master recipes. Food service supervisors provide direct supervision over the preparation of all meals to ensure the preparations follow the recipe.
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"/>	

FOOD SERVICE

POLICY: EVERY FACILITY WILL PROVIDE DETAINEES IN ITS CARE WITH NUTRITIOUS AND APPETIZING MEALS, PREPARED IN ACCORDANCE WITH THE HIGHEST SANITARY STANDARDS.

COMPONENTS	YES	NO	NA	REMARKS
<p>A common-fare menu available to detainees whose dietary requirements cannot be met on the main line.</p> <ul style="list-style-type: none"> Changes to the planned common-fare menu can be made at the facility level; Hot entrees are offered three times a week; The common-fare menus satisfy nutritional recommended daily allowances (RDAs); Staff routinely provide hot water for instant beverages and foods; <ul style="list-style-type: none"> Common-fare meals are served with: <ul style="list-style-type: none"> Disposable plates and utensils. Reusable plates and utensils. Staff use separate cutting boards, knives, spoons, scoops, etc., to prepare the common-fare diet items. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Common-fare meals are prepared as needed. Hot entrees are offered daily. The common-fare menu meets the nutritional recommended daily allowances and hot water is routinely provided on the housing units. Common-fare meals are served on disposable plates and disposable utensils are also used. Separate cutting boards, knives, spoons, scoops, etc. are used to prepare common-fare diet items. Kosher diets are provided in pre-packaged meals and served with disposable plates and 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 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"> Muslims fasting during Ramadan receive their meals after sundown. Jews who observe Passover but do not participate in the Common-Fare Program receive the same Kosher-for-Passover meals as those who do participate. Main-line offerings include one meatless meal (lunch or dinner) on Ash Wednesday and Fridays during Lent. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The food service program recognizes the importance of a detainee abstaining from particular foods and fasting for religious purposes at prescribed times of the year. The elements of this component are met as required. It should be noted that other special meals would be recognized also, if requested by the detainee.
The food service program addresses medical diets.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Satellite-feeding programs follow guidelines for proper sanitation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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"/>	
All meals are provided in nutritionally adequate portions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Food is not used to punish or reward detainees based upon behavior.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>The food service staff instructs detainee volunteers on:</p> <ul style="list-style-type: none"> Personal cleanliness and hygiene; Sanitary techniques for preparing, storing, and serving food; and The sanitary operation, care, and maintenance of equipment. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Food service personnel instruct non-ICE detainees in the proper techniques for preparing, storing and serving food, as well as the sanitary operation, care and maintenance of equipment. Personal observation of non-ICE detainee workers in the food service operation indicates the detainees are clean and practice good hygiene.
Everyone working in the food service department complies with food safety and sanitation requirements.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>Standard operating procedures include weekly inspections of all food service areas, including dining and food-preparation areas and equipment.</p> <ul style="list-style-type: none"> Who conducts the inspections? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The FSM conducts weekly and monthly inspections of all food service areas. The Food Service Supervisor conducts daily inspections of all food service areas.

FOOD SERVICE

POLICY: EVERY FACILITY WILL PROVIDE DETAINEES IN ITS CARE WITH NUTRITIOUS AND APPETIZING MEALS, PREPARED IN ACCORDANCE WITH THE HIGHEST SANITARY STANDARDS.

COMPONENTS	YES	NO	NA	REMARKS
Equipment is inspected for compliance with health and safety codes and regulations. <ul style="list-style-type: none"> When was the most recent inspection? Which agency conducted the inspection? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The food service operation is inspected by the Denver Department of Environmental Health for compliance with health and safety codes and regulations. The last inspection was conducted September 20, 2011.
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"/>	Temperature checks of dishwashing machines are made and documented after each use of the machines.
Staff documents the results of every refrigerator/freezer temperature check.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Refrigerator and freezer temperature checks are made and documented as required.
The cleaning schedule for each food service area is conspicuously posted.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cleaning schedules for all areas of the food service operation are conspicuously posted.
Procedures include inspecting all incoming food shipments for damage, contamination, and pest infestation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Documentation of the inspection of incoming food shipments was reviewed during the inspection. All incoming food shipments are inspected as required.
Storage areas are locked when not in use.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage areas were observed to be locked when not in use during the inspection.

☒ ACCEPTABLE
 ☐ DEFICIENT
 ☐ AT-RISK
 ☐ REPEAT FINDING

REMARKS:

The food service operation of this facility utilizes the Hazard Analysis and Critical Control Point (HACPP) system. This is a management system in which food safety is addressed through the analysis and control of biological, chemical and physical hazards. This system requires an increased amount of documentation in all areas of the food service environment. Records of temperature checks of food, dishwashing machines, freezers and refrigerators are maintained at a level which far exceeds the requirements of this standard.

The training records of non-ICE detainee workers in the food service area are not maintained in the detainee's individual detention file as required.

Food service personnel do not oversee or participate in counts of detainee workers in the food service operation.

It should be noted that non-ICE detainee workers in the food service operation can acquire their ServSafe certification.

During the inspection, the food service operation at this facility was extremely well organized and clean.

(b)(6), (b)(7)(c) / October
AUDITOR'S SIGNATURE /

(b)(6), (b)(7)(c)

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"/>	Facility policy 4840.1 addresses the facility's property procedures.
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"/>	Facility policy 4840.1 addresses secure storage of large valuable property of detainees.
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"/>	Baggage and personal property of detainees is itemized and inventoried upon arrival at the facility. The forms used by the facility meets the ICE standard.
Staff forwards an arriving detainee's medication to the medical staff.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Medical staff takes control of an arriving detainee's medication. The medication is identified and date verified. Medication not immediately needed is stored with the detainee's property.
Audits of baggage and non-valuable property occur each quarter and audits are logged and verified.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Audits of baggage and non-valuable property are not conducted quarterly.
(b)(7)(e) officers are present during the processing of detainee funds and valuables during in-processing to the facility. (b)(7)(e) officers verify funds and valuables.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. (b)(7)(e) officer accounts for a detainee's funds and valuables during the intake process.
Staff searches arriving detainees and their personal property for contraband.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Detainees and their personal property are searched for contraband upon arrival.
Staff procedures follow written policy for returning forgotten property to detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility policy 3470.1A addresses the process for returning forgotten property to detainees.
Property discrepancies are immediately reported to the CDEO or Chief of Security.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Property discrepancies are forwarded to Internal Affairs for investigation.
Staff follows written procedures when returning property to detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility policy 4840.1 includes written procedures for returning property to 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"/>	
The facility attempts to notify an out-processed detainee that he/she left property in the facility: <ul style="list-style-type: none"> By sending written notice to the detainee's last known address; Via certified mail; and The notice state that the detainee has 30 days in which to claim the property, after which it will be considered abandoned. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Facility policy 3470.1A addresses all bulleted items identified in this component.

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
The facility disposes of abandoned property in accordance with written procedures. <ul style="list-style-type: none"> If a CDF/IGSA facility, written procedure requires the prompt forwarding of abandoned property to ICE. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The section of this component requiring written procedures for the disposal of abandoned property is specific to SPCs and CDFs. Facility policy does not address how abandoned property of ICE detainees will be promptly forwarded to ICE.
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

This inspector reviewed facility policies which address the inventory and storage of detainee property. The storage area was inspected and found to be adequate.

The facility has not yet established and adopted the policy requiring prompt forwarding of an ICE detainee's abandoned property to ICE. Disposal of non-ICE detainee abandoned and/or forgotten property is covered in detail in facility policy 3470.1A. Detainee property is itemized, inventoried, accounted for and stored appropriately.

(b)(6), (b)(7)(c) / October 13, 2011

AUDITOR'S SIGNATURE

(b)(6), (b)(7)(c)

DETAINEE GRIEVANCE PROCEDURES

POLICY: EVERY FACILITY WILL DEVELOP AND IMPLEMENT STANDARD OPERATING PROCEDURES (SOPs) FOR ADDRESSING DETAINEE GRIEVANCES IN TIMELY FASHION. EACH STEP IN THE PROCESS WILL OCCUR WITHIN THE PRESCRIBED TIME FRAME. AMONG OTHER THINGS, A GRIEVANCE WILL BE PROCESSED, INVESTIGATED, AND DECIDED (SUBJECT TO APPEAL) IN ACCORDANCE WITH THE SOPs; A GRIEVANCE COMMITTEE WILL CONVENE AS PROVIDED IN THE SOPs. STANDARD PROCEDURE WILL INCLUDE PROVIDING THE DETAINEE WITH A WRITTEN RESPONSE TO ANY FORMAL GRIEVANCE, WHICH WILL INCLUDE THE BASIS FOR THE DECISION. THE FACILITY WILL ALSO ESTABLISH STANDARD PROCEDURES FOR HANDLING EMERGENCY GRIEVANCES. ALL GRIEVANCES WILL RECEIVE SUPERVISORY REVIEW. REPRISAL AGAINST THE FILER OF A GRIEVANCE WILL NOT BE TOLERATED.

COMPONENTS	YES	NO	NA	REMARKS
Written procedures provide for the informal resolution of oral grievances (Not mandatory). <ul style="list-style-type: none"> If yes, the detainee has up to five days within which to make his/her concern known to a member of the staff. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility grievance procedure encourages detainees to informally address their grievances with the housing officer. The facility utilizes a direct supervision model; therefore, the housing officer is in the housing area at all times and in the best position to resolve most detainee grievances.
Detainees have access to the grievance committee (or equivalent in IGSA), using formal procedures. <ul style="list-style-type: none"> Detainees may seek help from other detainees or facility staff when preparing a grievance. Illiterate, disabled, or non-English-speaking detainees receive special assistance when necessary. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If the informal resolution process does not satisfy the grievant's complaint, a written grievance may be filed with the building officer or a Sergeant or place the grievance in the grievance box. Grievances may also be placed in a sealed envelope and forwarded to the Operations Commander. Grievances may be appealed to the Division Chief, as well as the Director of Corrections. Detainees may enlist the help of other detainees or staff when preparing a grievance. Assistance is provided to detainees who may need help due to being illiterate, disabled or non-English speaking.
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"/>	Staff is trained to react immediately to grievances determined to be emergencies. These grievances are forwarded to the Shift Sergeant.
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"> If yes, explain. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A review of the grievance log did not indicate any documented cases of staff harassing, disciplining, penalizing or otherwise retaliating against a detainee who lodged a complaint.
Procedures include maintaining a Detainee Grievance Log. <ul style="list-style-type: none"> If not, an alternative acceptable record keeping system is maintained. "Nuisance complaints" are identified in the records. For quality control purposes, staff document nuisance complaints received but not filed. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The section of this component that requires "nuisance complaints" to be identified in the records and for staff to document nuisance complaints received but not filed is specific to SPCs and CDFs. A detailed grievance log is maintained by the facility. Nuisance complaints are identified in the log. The process for handling nuisance complaints is detailed in the facility handbook.
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"/>	All grievances that include allegations of officer misconduct are forwarded to the Operations Commander. Staff report that any grievance filed by an ICE detainee alleging officer misconduct would be immediately forwarded to ICE.

☒ ACCEPTABLE
☐ DEFICIENT
☐ AT-RISK
☐ REPEAT FINDING

REMARKS:

This inspector reviewed the facility grievance policy and the section of the handbook which addresses the facility grievance policy. The facility grievance log was also reviewed. The facility grievance policy encourages the informal resolution of grievances but also allows grievances to be appealed to higher authorities within the chain of command. At the time of the inspection there were no ICE detainees housed in the facility, and none have been housed during the past year.

(b)(6), (b)(7)(c) / October 13

AUDITOR'S SIGNATURE / DATE

(b)(6), (b)(7)(c)

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:

There have been no requests for group legal rights presentations.

(b)(6), (b)(7)(c) / October 13, 20

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W ENFORCEMENT SENSITIVE)

ISSUANCE AND EXCHANGE OF CLOTHING, BEDDING, AND TOWELS

POLICY: ICE REQUIRES THAT ALL FACILITIES HOUSING ICE DETAINEES PROVIDE CLEAN CLOTHING, BEDDING, LINENS AND TOWELS TO EVERY ICE DETAINEE UPON ARRIVAL. FURTHER, FACILITIES SHALL PROVIDE ICE DETAINEES WITH REGULAR EXCHANGES OF CLOTHING, LINENS, AND TOWELS FOR AS LONG AS THEY REMAIN IN DETENTION.

COMPONENTS	YES	NO	NA	REMARKS
The facility has a policy and procedure for the regular issuance and exchange of clothing, bedding, linens, and towels. <ul style="list-style-type: none"> The supply of these items exceeds the minimum required for the number of detainees. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility has a policy for the regular issuance and exchange of clothing, bedding, linens and towels. The supply of these items on hand exceeds the minimum number required for the number of detainees served.
All new detainees are issued clean, temperature-appropriate, presentable clothing during in-processing. Detainees receive: <ul style="list-style-type: none"> One uniform shirt and one pair of uniform pants, or one jumpsuit; One pair of socks; One pair of underwear (Daily change); and One pair of facility-issued footwear. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The bulleted items in this component are specific to SPCs and CDFs. The facility issues clean, temperature-appropriate, presentable clothing to detainees upon booking. The facility does not issue socks or underwear unless the detainee does not have these items when booking and change out occurs. The facility also does not issue footwear.
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"> One mattress; One blanket; Two sheets; One pillowcase; One towel; and Additional blankets are issued based on local weather conditions. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The bulleted items in this component are specific to SPCs and CDFs. Detainees are issued everything identified in this component except a pillowcase. A pillow is made into the mattress. Additional blankets are issued as needed.
Detainees assigned to special work areas are clothed in accordance with the requirements of the job.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees are provided clean clothing, linen and towels. <ul style="list-style-type: none"> Socks and undergarments - exchanged daily. Outer garments - twice weekly. Sheets - weekly. Towels - weekly. Pillowcases - weekly. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Clean socks and undergarments are not provided to detainees daily. Pillowcases are not issued. A pillow is made into the mattress.
Food service detainee volunteer workers are permitted to exchange outer garments daily.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Food service detainee workers are provided clean clothes daily upon reporting to work.
Volunteer detainee workers are permitted to exchange outer garments more frequently.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Volunteer detainee workers are permitted to exchange outer garments on an as-needed basis depending upon their work assignment.
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

The facility handbook addresses the issuance of clothing, bedding and towels. New detainees are issued the required clean clothing and bedding. Detainees are issued two sets of outer garments which allow for exchange twice weekly as required. Sheets and towels are exchanged weekly. Detainees are issued long johns during periods of cold weather and additional blankets may be requested as needed.

The facility does not issue clean underwear and socks daily; although, washing machines and dryers are available on each housing unit and can be used by detainees daily to wash these items if they desire. Indigent detainees are supplied a minimal amount of tokens for washing their undergarments, if they desire to do so.

(b)(6), (b)(7)(c) / October 1

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(b)(6), (b)(7)(c)

MARRIAGE REQUESTS

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

COMPONENTS	YES	NO	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"/>	ICE staff reports marriage request are considered on a case-by-case basis by the Field Office Director.
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"/>	All marriage request submitted by an ICE detainee at this facility will be forwarded to ICE for processing and approval.
It is standard practice to require a written request for permission to marry.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	To be considered, a marriage request must be submitted in writing.
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"/>	To be considered, a marriage request must be submitted in writing and accompanied by a signed statement or comparable document from the intended spouse indicating their intent to be married to the detainee.
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"/>	The detainee would receive a copy of the decision regarding the marriage request from ICE staff.
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 detainee would receive a copy of the decision regarding the marriage request from ICE staff. If the request is denied, the detainee would be advised in writing of the basis of the denial.
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"/>	Facility staff reports a place for the wedding and the time to make wedding arrangements would be provided to the detainee if the request to marry is granted by ICE.
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

Facility staff and ICE staff exhibited an understanding of the process for a detainee to request permission to marry. The approval for a detainee marriage would rest with ICE and the facility would forward all such requests to ICE for processing. It is important to note the facility has not held any ICE detainees as of yet, and this situation has not occurred.

(b)(6), (b)(7)(c) / October
AUDITOR'S SIGNATURE / D

(b)(6), (b)(7)(c)

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"> Funeral; or Deathbed 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility recognizes mother, father, brother, sister, spouse, child, step-parent, and foster parent as "immediate family".	<input 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 type="checkbox"/>	
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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Each escort includes at least two officers.	<input 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 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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Escort officers ensure that detainees: <ul style="list-style-type: none"> Conduct themselves in a manner that does not bring discredit to the ICE; Do not violate federal, state, or local laws; Do not purchase, possess, use, consume, or administer narcotics, other drugs, or intoxicants; Make no unauthorized phone calls; and Know they are subject to search, urinalysis, breathalyzer, or comparable test upon return. 	<input 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

☐ **ACCEPTABLE**

☐ **DEFICIENT**

☐ **AT-RISK**

☐ **REPEAT FINDING**

REMARKS:

According to interviews with facility staff and ICE staff, any approved transport for non-medical emergency trips would be coordinated and arranged by ICE personnel . . .

(b)(6), (b)(7)(c) / October 13
AUDITOR'S SIGNATURE / DATE

(b)(6), (b)(7)(c)

RECREATION

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

COMPONENTS	YES	NO	NA	REMARKS
The facility has a recreation program and facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Dayroom and outdoor recreation opportunities are available to detainees in the facility.
A recreational specialist (for facilities with more than 350 detainees) tailors the program activities and offerings to the detainee population.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. The facility does not employ a recreation specialist. Correctional officers supervise recreation activities.
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 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"/>	Correctional officers supervise recreational activities of detainees in the special housing units/status.
Dayrooms offer sedentary activities, e.g., board games, cards, television.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Sedentary games are available in housing area 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"/>	Each detainee has a minimum of one hour out of cell time each day. Some housing in the facility is open bay allowing detainees opportunities for dayroom activities all day long.
Detainees have access to recreation activities outside the housing units for at least one hour daily, 5 days a week.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff checks all items for damage and condition when equipment is returned.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff conducts searches of recreation areas before and after use.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All recreation areas under constant staff supervision.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Officers assigned to recreation provide constant supervision of detainees.
Supervising staff is equipped with radios.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All staff is equipped with radios.
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"/>	Facility policy indicates detainees in SHU are allowed one hour of outdoor recreation time five times per week, contingent upon weather conditions.
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Volunteers at the facility are required to complete a background investigation and sign a waiver of liability before being allowed to enter the facility.
Visitors, relatives or friends are not allowed to serve as volunteers.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Visitors, relatives and friends of detainees are not allowed to serve as volunteers at the facility.

☒ If outdoor recreation is offered, check this box. No further information is required when outdoor recreation is offered.

RECREATION

POLICY: IT IS ICE POLICY TO PROVIDE ACCESS TO RECREATIONAL PROGRAMS AND ACTIVITIES TO ALL ICE DETAINEES, TO THE EXTENT POSSIBLE, UNDER CONDITIONS OF SECURITY AND SUPERVISION THAT PROTECT THEIR SAFETY AND WELFARE.

COMPONENTS	YES	NO	NA	REMARKS
If the facility has no outside recreation, are detainees considered for transfer after six months? • 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 detainee, or the OIC's written determination of the detainee's ineligibility for transfer.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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 does not currently house ICE detainees. Staff reports that should ICE detainees be housed in the facility the detainees will be housed in an area which has access to outdoor recreation. This access would be denied only when inclement weather would not allow the detainees to go outdoors. Female ICE detainees would be escorted to an outdoor recreation area. All detainees in the facility have access to recreation in the dayrooms of the housing areas a minimum of one hour per day, seven days a week.

(b)(6), (b)(7)(c) / Octob
AUDITOR'S SIGNATURE

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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	YES	NO	NA	REMARKS
Detainees are allowed to engage in religious services.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility policy 4910.1C provides guidance for the detainee's access to religious services. Detainees are allowed and encouraged to participate in religious services while in the facility.
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. • List any exceptions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility allows and encourages detainees to participate in the observation of the major holy day celebrations of their religious faith. No exceptions were noted. Facility staff reports an exception would only be made if the celebration interfered with facility safety or security.
The facility accommodates recognized holy-day observances by: • Providing special meals, consistent with dietary restrictions; • Honoring fasting requirements; • Facilitating religious services; and • Allowing activity restrictions.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Facility policy recognizes the holy day observances listed in this component as well as others when appropriate.
Each detainee is allowed religious items in his/her immediate possession.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainees may have religious items in their possession.
Volunteer's credentials are checked and verified before allowing participation in detainee programs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility policy requires the credentials of all volunteers to be checked and verified prior to having access to the facility.
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 may not conduct group services but may conduct individual services.
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"/>	
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

The facility allows and encourages detainees to participate in religious programming in the facility. The facility has a Chaplain who is responsible for providing all faiths the reasonable and equitable opportunity to participate in the practice of their faith. Detainees are allowed to practice their religious beliefs, which are limited only if the practice constitutes a threat to the safe and secure operation of the facility.

(b)(6), (b)(7)(c) / Oc
AUDITOR'S SIGNATURE

(b)(6), (b)(7)(c)

DETAINEE TELEPHONE ACCESS

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

COMPONENTS	YES	NO	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"/>	Detainees receive a copy of the detainee handbook which is inclusive of the facility's telephone policy.
Access rules are posted in housing units.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Access rules are not posted in any area accessible to detainees.
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"/>	
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"/>	
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"/>	
A procedure exists to assist a detainee who is having trouble placing a confidential call.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility provides the detainees with the ability to make non-collect (special access) calls.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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"/>	
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The phone number of the Office of Inspector General (OIG) is programmed into the facilities' detainee phone system.
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"/>	There have been no restrictions this past reporting period; however, documentation of restrictions is required at this facility.
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"/>	The facility Chaplain will personally relay emergency messages to detainees. The Shift Commander will relay such information in the absence of the Chaplain.
Detainees are allowed to return emergency phone calls as soon as possible.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

DETAINEE TELEPHONE ACCESS

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

COMPONENTS	YES	NO	NA	REMARKS
Detainees in disciplinary segregation are allowed phone calls relating to the detainee's immigration case or other legal matters, including consultation calls.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees in disciplinary segregation are allowed phone calls to consular/embassy officials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees in disciplinary segregation 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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There are no posted warnings at or near detainee telephones. Special Access calls are not monitored.
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

This inspector reviewed facility policy and procedure, reviewed the detainee handbook, interviewed staff, inspected detainee living areas, and checked detainee phones to ensure connectivity with the Homeland Security toll free number (OIG Hotline). The facility demonstrates an acceptable level of compliance with this standard and is rated accordingly.

Access rules are not posted in detainee living areas. There is no direction (posted or otherwise) provided for detainees that would inform them of access to the OIG hotline or any other special access calls.

There are no warnings posted at or near detainee phones advising that calls may be monitored.

(b)(6), (b)(7)(c) / October
AUDITOR'S SIGNATURE / D

(b)(6), (b)(7)(c)

VISITATION

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

COMPONENTS	YES	NO	NA	REMARKS
There is a written visitation schedule and hours for general visitation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The visitation hours tailored to the detainee population and the demand for visitation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The visitation schedule and rules are available to the public.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The hours for all categories of visitation are posted in the visitation waiting area.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A written copy of the rules regulating visitation and the hours of visitation is available to visitors.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A general visitation log is maintained.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The general visitation log is recorded by use of an automated system.
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"/>	While visitors are subject to search, searches rarely occur. All visitations with friends or family are non-contact using a closed circuit audio-visual system.
The requirement on visitation by minors is complied with.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
At facilities where there is no provision for visits by minors, 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"/>	Minors are allowed visitation so long as they are accompanied by an adult. The number of visitors allowed at any one time is three.
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"/>	Minors are allowed visitation privileges.
Detainees in special housing are afforded visitation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Legal visitation is available seven (7) days a week, including holidays.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Legal visitation is allowed at any time or day so long as there has been advance notification.
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"/>	Legal visits occur in individual contact visitation rooms.
There are written procedures governing detainee searches.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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"/>	Strip searches are not required after every contact visit with a legal representative.
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There was no listing of pro bono legal organizations in any living unit inspected.
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"/>	

VISITATION

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

COMPONENTS	YES	NO	NA	REMARKS
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"/>	
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

The facility utilizes an automated visiting system (audio-visual) for visits with family and friends. Visiting stations are set up in the public reception/waiting area as well as in detainee living areas.

Individual rooms are designated for legal visits that allow contact and or document exchange.

The visiting log is maintained on an automated system. The facility demonstrates an acceptable level of compliance with this standard and is rated accordingly.

Listings of pro bono legal organizations are not posted in detainee living areas.

(b)(6), (b)(7)(c) / October
AUDITOR'S SIGNATURE / DATE

(b)(6), (b)(7)(c)

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	YES	NO	NA	REMARKS
Does the facility have a voluntary work program? • Do ICE detainees participate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility offers a voluntary work program for detainees. Facility policy 4420.1A addresses the detainee work program. ICE detainees are not currently held in this facility. Staff indicates ICE detainees would be allowed to participate in the program.
Detainee housekeeping meets neatness and cleanliness standards.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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"/>	Non-ICE detainee volunteer workers are allowed to work on special work crews outside the secure perimeter of the facility. ICE detainees would not be allowed to participate in work details outside the secure perimeter of the facility.
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 encourages physically and mentally-challenged detainees to participate in the work program. Facility policy addresses the development of work assignments which special need detainees might participate in.
The facility complies with work-hour requirements for detainees, not exceeding: • Eight hours a day and Forty hours a week.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Detainee workers are limited to eight hour days and 40-hour work weeks at this facility.
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"/>	Justification for removal from a work detail of an ICE detainee would be written and placed in the detainee's detention file.
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"/>	
The voluntary work program meets: • OSHA, NFPA, ACA standards	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The section of this component that requires the voluntary work program to meet NFPA, and ACA standards is specific to SPCs and CDFs. The detainee work program meets the standards of all three agencies.
Medical staff screen and formally certify detainee food service volunteers. • Before the assignment begins; and • As a matter of written procedure	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Detainees receive safety equipment/ training sufficient for the assignment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Proper procedure is followed when an ICE detainee is injured on the job.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If an ICE detainee volunteer worker was injured on the job, proper procedure would be followed, and ICE would be notified immediately.
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

The facility has an active and large detainee work program. Colorado law requires all persons sentenced to jail for misdemeanors and ordinance violations work. ICE detainees would be allowed to volunteer in the work program but not allowed to participate in work details outside the secure perimeter of the facility.

(b)(6), (b)(7)(c) / October 13, 2011

AUDITOR'S SIGNATURE

(b)(6), (b)(7)(c)

SECTION II

HEALTH SERVICES STANDARDS

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	YES	NO	NA	REMARKS
When a detainee has refused food for 72 hours, it is standard practice for staff to refer him/her to the medical department.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Medical staff is notified when a detainee begins a hunger strike.
CDFs and IGSAAs immediately report a hunger strike to the ICE.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Both the ICE IEA and the Health Services Administrator (HSA) reported that if an ICE detainee began a hunger strike, it would be reported 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"/>	Facility policy states attempts are made to resolve the hunger strike immediately and if that is not successful, medical and/or mental health staff is notified.
Policy and procedure require that staff isolate a hunger-striking detainee from other detainees. • If yes, in an observation room?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. The hunger striker is moved to an area that medical and security staff can monitor.
Medical personnel are authorized to place a detainee in the Special Management Unit or a locked hospital room.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Medical staff may place a detainee in a locked hospital room.
Medical staff records the weight and vital signs of a hunger-striking detainee at least once every 24 hours.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Medical staff records blood pressure, pulse, weight, mental status, evaluation of skin turgor and general appearance daily.
The OIC of the facility obtains a hunger striker's consent before medical treatment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Consent to treatment is sought before medical treatment is provided.
A signed Refusal of Treatment form is required of every detainee who rejects medical evaluation or treatment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. The detainee is required to sign the Refusal of Treatment form.
During a hunger strike, staff document and provide the hunger-striking detainee three meals a day.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Three meals per day is provided to the hunger striker and documented.
Staff maintains the hunger striker's supply of drinking water/other beverages.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Fluids are made available.
During a hunger strike, staff removes all food items from the hunger striker's living area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. The hunger striker is moved to a medical cell without food items.
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Food and fluid intake is recorded in the medical record.
The medical staff has written procedures for treating hunger strikers.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	These procedures are described in written procedures, Refusal to Eat.
Staff documents all treatment attempts, including attempts to persuade hunger striker of medical risks.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Staff has periodic discussions with the detainee and offers of food are continued in an attempt to end the hunger strike.

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	YES	NO	NA	REMARKS
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"/>	Staff receives training on identification of hunger strikes as part of the Inmate Supervision training provided during initial orientation. Medical staff receives training on hunger strikes during initial orientation and as needed.
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

The HSA reports there has not been a serious hunger strike at the facility since the last review.

The ICE IEA reports ICE detainees have never been housed at this facility. Therefore, a review of procedures used during an actual ICE detainee hunger strike is not possible.

The rating is based on a review of facility policies, and interviews with both medical and security staff.

(b)(6), (b)(7)(c) / October
AUDITOR'S SIGNATURE / I

(b)(6), (b)(7)(c)

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	YES	NO	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 operates in compliance with the state of Colorado and local laws. The facility is accredited by the American Correctional Association (ACA) and the National Commission on Correctional Health Care (NCCCHC).
The facility's in-processing procedures for arriving detainees include medical screening.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainees receive a medical screening upon arrival by medical personnel. This medical screen is performed in addition to any other medical screen that may accompany the detainee from another facility.
All detainees have access to and receive medical care.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainees are instructed how to access health care upon admission. In addition, access is described in the detainee handbook and as posted in the housing units. All detainees have access to and receive medical care. Sick call is held daily.
The facility has access to a PHS/DIHS Managed Health Care Coordinator.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The HSA has access to the Managed Health Care Coordinator should contact be necessary.
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"/>	Medical staff, provided through Denver Health Medical Center, is on duty at the facility 24 hours per day, seven days per week. Staff includes registered nurses, licensed practical nurses, psychiatric registered nurse, tuberculosis technician, medical record clerks, mid-level practitioners, physicians, psychiatrist, dentist, dental assistant and other clerks, totaling (b)(7)(F) full-time equivalents (FTE). In addition, administrative staff includes the HSA, nurse managers, administrative assistants, pharmacist, social worker and technicians for an additional (b)(7)(F) FTEs. Appropriate licensing and/or certifications are current.
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 health service unit is large and has sufficient equipment.
The medical facility has its own restricted-access area. The restricted access area is located within the confines of the secure perimeter.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. The health services unit (HSU) has its own restricted-access area within the confines of the secure perimeter.
The medical facility entrance includes a holding/waiting room.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. There are two holding rooms each containing a one piece stainless toilet and sink. There are also two holding cages, with no available water. There is also another small holding area located at the rear of the HSU, with no available water. The latter two areas are only used should the two holding rooms be full.

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	YES	NO	NA	REMARKS
The medical facility's holding/waiting room is under the direct supervision of custodial staff.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. All of the holding rooms are under the direct supervision of custodial staff.
Detainees in the holding/waiting room have access to a drinking fountain.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Two of the four holding areas (rooms) have access to running water.
Medical records are kept apart from other files. They are: <ul style="list-style-type: none"> Secured in a locked area within the medical unit; With physical access restricted to authorized medical staff; and Procedurally, no copies made and placed in detainee files. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Medical records are secured in a two-office medical records area within the HSU. Access is restricted to authorized medical staff. No copies of medical records are placed in detainee files.
Pharmaceuticals are stored in a secure area.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Pharmaceuticals are stored in a two room pharmacy, with restricted access.
Medical screening includes a Tuberculosis (TB) test. <ul style="list-style-type: none"> Every arriving detainee receives a TB test during the admission process; Detainee's TB-screening does not occur more than one business day after his/her arrival at the facility; and Detainees not screened are housed separate from the general population. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The HSA, the Nurse Manager, and the TB Technician report that TB testing is performed upon admission in the booking area. Facility policy and procedure requires TB testing to be performed on admission.
All detainees receive a mental-health screening upon arrival. It is conducted: <ul style="list-style-type: none"> By a health care provider or specially trained officer; and Before a detainee's assignment to a housing unit. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The portion of this component that requires a detainee to receive a mental health screening before being assigned to a housing unit is specific to SPCs and CDFs. All admissions receive a mental health screening upon arrival and before assignment to a housing unit. The mental health screening is performed by medical personnel. This is in addition to any mental health screening that may accompany the detainee from another facility.
The facility health care provider promptly reviews all I-794s (or equivalent) to identify detainees needing medical attention.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Medical personnel provide an initial screening and document it on a local form equivalent to the I-794 providing \ immediate identification of detainees needing medical attention.
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"/>	Physical examinations are performed within 14 days of admission, as required by facility policy.
Detainees in the Special Management Unit have access to health care services.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Detainees in the Special Management Unit (SMU) have access to routine health care services through communication with medical staff that make rounds in the unit three times per day and to emergency health care services through immediate communication with security staff on the unit.

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	YES	NO	NA	REMARKS
Staff provides detainees with health services (sick call) request slips daily, upon request. <ul style="list-style-type: none"> Request slips are available in languages other than English, including every language spoken by a sizeable number of the facility's detainee population. Service-request slips are delivered in a timely fashion to the health care provider. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The requirement for staff to provide detainees with health services (sick call) request slips daily, upon request and the request slips are available in languages other than English, including every language spoken by a sizeable number of the facility's detainee population is specific to SPCs and CDFs. Health services request slips (in both English and Spanish) are provided daily and are delivered, at least daily, to medical staff.
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Medical staff is on site 24 hours per day, seven days per week. There is a plan for the delivery of emergency health care when immediate outside medical attention is required.
The plan includes an on-call provider.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. A physician, a dentist, and a psychiatrist are on call 24 hours per day, seven days per week.
The plan includes a list of telephone numbers for local ambulance and hospital services.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Denver Health Medical Center ambulance service (local 911) is used.
The plan includes procedures for facility staff to utilize this emergency health care consistent with security and safety.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. It is the policy of the Denver Sheriff's Department to treat and transport detainees in a safe and secure manner, consistent with their criminal charges, classification status, and mental and physical health and condition.
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"/>	Both security and medical staff are trained to respond to health-related situations within a four-minute response time, as reported by the HSA, and documented on training records.
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"/>	This component is only applicable for SPCs and CDFs. Only medical staff distributes medication.
The medical unit keeps written records of medication that is distributed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As observed by this inspector, medical staff records medication distribution on Medication Administration Records (MAR).
The Form I-819 (or IGSA equivalent) is used to notify the Warden/Facility of a detainee that has special medical needs.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Notification of special needs is made verbally to facility staff or in writing as a recommendation on the classification form.
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"/>	A general consent to treatment is obtained from a detainee during the health assessment, as reported by the HSA and viewed on the Health Assessment form.

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	YES	NO	NA	REMARKS
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"/>	A Release of Information form signed by the detainee is required to release medical information to outside sources.
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"/>	The HSA reports medical personnel are given advance notice of detainee release.
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"/>	Detainee's medical records or a health summary are available and transferred with the detainee.
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"/>	As reported by the HSA and observed by this inspector, medical records are placed in a sealed envelope, labeled confidential.
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

The facility was accredited by the ACA in August 2009 and the NCCHC in September 2011.

The HSU is a large rectangular area with an open center. A large, two-room pharmacy and the medical records offices line the wall to the left of the entrance. Patient cells and rooms run perpendicular to that wall. Holding areas, the triage room and procedure room line the wall opposite. There are exam rooms, offices, two officers' stations, and a medical ward capable of housing nine detainees (currently closed and being renovated), a dental suite, supply rooms and a break room. The dental suite contains one chair, but has no x-ray capability. Currently the pharmacist makes blister packs for all medications, but the facility is moving to a new Talyst system, which automatically dispenses medications, in the near future. Additionally, there is an exam room in the building housing female detainees and an exam room in the building housing male work release detainees. There is an automated external defibrillator in the procedure room.

Syringe and tool counts, as well as controlled substances counts, were performed and found to be accurate.

The facility charges a \$7.00 co-pay for certain medical services.

The ICE IEA reports that ICE detainees have never been housed at this facility. Therefore, a review of ICE detainee medical records was not possible.

The rating is based on review of facility policy and procedure; review of available documentation, forms and training records; interviews with both medical and security staff; and direct observation in the HSU and on the housing units.

(b)(6), (b)(7)(c) / October
AUDITOR'S SIGNATURE / I

(b)(6), (b)(7)(c)

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	YES	NO	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"/>	Both security and medical staff receive suicide-prevention training during initial orientation and annually, as documented in training records. Annual training is available on-line.
Training prepares staff to: <ul style="list-style-type: none"> Recognize potentially suicidal behavior; Refer potentially suicidal detainees, following facility procedures; and Understand and apply suicide-prevention techniques. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Training prepares staff to identify, manage, and stabilize suicidal inmates, while promoting suicide awareness in routine activities.
A health-care provider or specially trained officer screens all detainees for suicide potential as part of the admission process. <ul style="list-style-type: none"> Screening does not occur later than one working day after the detainee's arrival. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Medical personnel screen all detainees for suicide potential as part of the admission process at this facility.
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"/>	Facility policy and procedure outlines referral procedures and responsibilities.
The facility has a designated isolation room for evaluation and treatment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility has two designated isolation rooms for evaluation and treatment located in the HSU.
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"/>	Each room contains a floor flush toilet and no other fixtures. The walls are smooth and there are no items that could be used to aid in a suicide attempt.
Medical staff has approved the room for this purpose.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Medical staff has approved the rooms for this purpose.
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"/>	Staff observes and documents the status of a suicide-watch detainee at least once every 15 minutes, or more often if constant observation is ordered by medical staff. Each of the rooms also supplies a video feed to the officer's station.

☒ ACCEPTABLE
☐ DEFICIENT
☐ AT-RISK
☐ REPEAT FINDING

REMARKS:

There was one non-ICE detainee suicide in November 2010. A 51 year old white male, admitted to the facility on November 19, 2010, with no prior history, was found hanging in his cell on November 23, 2010. He was cut down and resuscitation attempts were begun. Emergency Medical Services arrived, assumed care of the detainee and transported him to Denver Health Medical Center where he was later pronounced dead.

The ICE IEA reports that ICE detainees have never been housed at this facility; therefore, a review of any ICE detainee medical records is not possible.

No suicide watches took place at the facility during the inspection.

The rating was based on a review of facility policy and procedures, review of training records, and interviews with medical and security staff.

(b)(6), (b)(7)(c) / October 13,
AUDITOR'S SIGNATURE / DATE

(b)(6), (b)(7)(c)

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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	YES	NO	NA	REMARKS
Detainees who are chronically or terminally ill are transferred to an appropriate offsite medical facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility does not normally accept detainees who are chronically or terminally ill. Should a detainee become terminally ill while at the facility, the detainee would be transferred to a more appropriate health care facility.
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"> The detainee's location; and The limitations placed on visiting. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Per the ICE IEA and the HSA, the facility would notify the local ICE office who, in turn, would notify the next of kin.
There are guidelines addressing the State Advanced Directive Form for Implementing Living Wills and Advanced Directives. <ul style="list-style-type: none"> The guidelines include instructions for detainees who wish to have a living will other than the generic form the DIHS provides or who wishes to appoint another to make advance decisions for him or her. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility policy states that in order to avoid any ethical questions, detainees who wish to complete Advance Directives will do so at Denver Health Medical Center in accordance with hospital policy and guidelines. Detainees who enter the facility with Advance Directives in place will have these honored.
The guidelines provide the detainee the opportunity to have a private attorney prepare the documents.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The guidelines do not address providing the detainee the opportunity to have a private attorney prepare the documents.
There is a policy addressing "Do Not Resuscitate Orders"	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Do Not Resuscitate (DNR) orders are addressed in the Denver Health guidelines.
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"/>	Therapeutic efforts and drugs which provide or maintain patient comfort and support human dignity may be used.
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"/>	Per the IEA, the facility would notify the local ICE office who, in turn, would notify the Immigration Health Services Corps (IHSC formerly DIHS) Medical Director and Legal Counsel.
The facility has written procedures to address the issues of organ donation by detainees.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The facility does not have written procedures to address the issues of organ donation by detainees. Denver Health Medical Center Advance Directives guidelines mention tissue donation, but no procedures are offered.
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"/>	Per facility policy, notification of next of kin is coordinated with the coroner.
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"/>	The facility has policy and procedure to address emergencies including the death of a detainee while in transport.
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"/>	Per the IEA, the detainee's remains would be disposed of in accordance with this standard.

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	YES	NO	NA	REMARKS
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"> If the detainee's is a U.S. military veteran, is the Department of Veterans Affairs notified? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Per the IEA, the ICE Field Office would schedule an indigent's burial, after consulting with the Department of Veterans Affairs.
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"/>	Per the IEA, the death certificate is placed in the subject's A-file.
The facility follows established policy and procedures describing when to contact the local coroner regarding such issues as: <ul style="list-style-type: none"> Performance of an autopsy; Who will perform the autopsy; Obtaining state approved death certificates; and Local transportation of the body. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility must notify the coroner of every death at the facility. The coroner determines who transports the body and whether an autopsy will be performed and who will perform it. The facility is responsible to obtain the death certificate.
ICE staff follows established procedures to properly close the case of a deceased detainee.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Per the IEA, closing the case includes documenting the file and filing the death certificate.

☒ **ACCEPTABLE**

☐ **DEFICIENT**

☐ **AT-RISK**

☐ **REPEAT FINDING**

REMARKS:

There has been one illness related detainee death since the last review. A 53 year old Hispanic non-ICE male detainee was pronounced dead at Denver Health Medical Center on September 16, 2011. He had a history of Hepatitis C, alcohol abuse, anemia, cirrhosis of the liver, portal hypertension and upper gastro-intestinal (GI) bleed. Shortly before his death, he had been admitted to the hospital after a GI bleed, and was treated and released back to the facility. He was returned to the hospital after suffering another bleed and died there.

Denver Health Medical Center has a very comprehensive policy and procedure regarding Advance Directives, Cardiopulmonary Resuscitation (CPR), and CPR status. Those policies and procedures do not address providing the detainee the opportunity to have a private attorney prepare the documents. Neither the facility nor Denver Health Medical Center has procedures available regarding organ donation.

The ICE IEA reports that ICE detainees have never been housed at this facility; therefore, a review of ICE detainee medical records was not possible.

Review of facility policies, training records and practices; and interviews with facility medical and security staff and ICE staff were used to determine compliance.

(b)(6), (b)(7)(c) / October
AUDITOR'S SIGNATURE /

(b)(6), (b)(7)(c)

SECTION III

SECURITY AND CONTROL STANDARDS

CONTRABAND

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

COMPONENTS	YES	NO	NA	REMARKS
The facility follows a written procedure for handling illegal contraband. Staff 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"/>	The portion of this component that requires staff to inventory, hold and report contraband when necessary to the proper authority for action/possible seizure is specific to SPCs and CDFs. Facility policy and procedures do exist to provide guidelines for the handling of illegal contraband. Staff do also inventory, hold, and report 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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Contraband that is government property is retained by the facility for potential disciplinary action or criminal prosecution.
Staff returns property not needed as evidence to the proper authority. Written procedures cover the return of such property.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Written procedures do exist which directs staff to return property not needed as evidence to the proper authority.
Altered property is destroyed following documentation and using established procedures.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Facility policy and procedures do permit altered property to be destroyed following documentation and using established procedures.
Before confiscating religious items, the OIC or designated investigator contacts a religious authority.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. A staff Chaplain would be contacted before confiscating religious items from a detainee.
Staff follows written procedures when destroying hard contraband that is illegal.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Current policy does provide guidelines for destroying hard contraband that is illegal.
Hard contraband that is illegal (under criminal statutes) may be retained and used for official use, e.g. training purposes. If yes, under specific circumstances and using specified written procedures. Hard contraband is secured when not in use.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Some hard contraband is used by the facility for training purposes and written procedures do exist that support contraband is secured when not in use.

☒ ACCEPTABLE
☐ DEFICIENT
☐ AT-RISK
☐ REPEAT FINDING

REMARKS:

After review of the facility policy and procedures, interviews with staff, and examination of existing documentation, it was determined that the facility is compliant with the Contraband standard.

(b)(6), (b)(7)(c) / October
AUDITOR'S SIGNATURE / I

(b)(6), (b)(7)(c)

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	YES	NO	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"/>	
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"> • Special requests • Any G-589s and/or I-77s closed-out during the detainee's stay • Disciplinary forms/Segregation forms • Grievances, complaints, and the disposition(s) of same 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Documentation specific to ICE detainees would be placed in the detainee's detention file if ICE detainees were confined to the facility. Other documentation to include grievances, complaints, disciplinary forms and requests are included in detention files.
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"/>	The portion of this component that requires detention files to be in lockable cabinets with the keys limited to supervisors if the files are not maintained in a secure area is specific to SPCs and CDFs. Detention files are located and maintained 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"/>	

☒ ACCEPTABLE
☐ DEFICIENT
☐ AT-RISK
☐ REPEAT FINDING

REMARKS:

Detention files for this facility are maintained in records storage at another facility in the City of Denver under jurisdiction of the Denver County Sheriff. This inspector reviewed facility policy and procedure regarding detention files and interviewed the Sergeant in charge of maintaining detention files. It should be noted that there are no ICE detainees currently held at either facility, consequently there was no specific file review.

(b)(6), (b)(7)(c) / October
AUDITOR'S SIGNATURE / DATE

(b)(6), (b)(7)(c)

DISCIPLINARY POLICY

POLICY: ALL FACILITIES HOUSING ICE DETAINEES ARE AUTHORIZED TO IMPOSE DISCIPLINE ON DETAINEES WHOSE BEHAVIOR IS NOT IN COMPLIANCE WITH FACILITY RULES AND REGULATIONS.

COMPONENTS	YES	NO	NA	REMARKS
The facility has a written disciplinary system using progressive levels of reviews and appeals.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility policy and procedures provides guidelines for the disciplinary program.
The facility rules state that disciplinary action shall not be capricious or retaliatory.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Rules do not currently state that disciplinary action shall not be capricious or retaliatory.
Written rules prohibit staff from imposing or permitting the following sanctions: <ul style="list-style-type: none"> corporal punishment deviations from normal food service clothing deprivation bedding deprivation denial of personal hygiene items loss of correspondence privileges deprivation of physical exercise 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Although current practices suggest that staff do not impose or permit the sanctions outlined in this component, there was no written policy that prohibits this behavior.
The rules of conduct, sanctions, and procedures for violations are defined in writing and communicated to all detainees verbally and in writing.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The following items are conspicuously posted in Spanish and English, and other dominate languages used in the facility: <ul style="list-style-type: none"> Rights and Responsibilities Prohibited Acts Disciplinary Severity Scale Sanctions 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The requirement to post "Prohibited Acts", the "Disciplinary Severity Scale", and the "Sanctions" is specific to SPCs and CDFs. Although all bulleted items are not conspicuously posted in Spanish and English, they are included in the detainee handbook which is distributed in both English and Spanish
When minor rule violations or prohibited acts occur, informal resolutions are encouraged.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Informal resolutions for minor rule violations are encouraged at the facility.
Incident reports and Notice of Charges are promptly forwarded to the designated supervisor.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs; however, Incident Reports and Notice of Charges are promptly forwarded to the designated supervisor.
Incident reports are investigated within 24 hours of the incident. The Unit Disciplinary Committee (UDC) or equivalent does not convene before an investigation ends.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
An intermediate disciplinary process is used to adjudicate minor infractions.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A disciplinary panel (or equivalent in IGSAs) adjudicates infractions. The panel: <ul style="list-style-type: none"> Conducts hearings on all charges and allegations referred by the UDC; Considers written reports, statements, physical evidence, and oral testimony; Hears pleadings by detainees and staff representatives; Bases its findings on the preponderance of evidence; and Imposes only authorized sanctions 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The bulleted sections of this component are specific to SPCs and CDFs. The Conduct Adjustment Board, under the supervision of a Captain, is utilized to adjudicate infractions. This board also addresses all bulleted elements of this component.
A staff representative is available if requested for a detainee facing a disciplinary hearing.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Facility policy and procedures do make provisions for the detainee to have a staff representative during a disciplinary hearing upon request.

DISCIPLINARY POLICY

POLICY: ALL FACILITIES HOUSING ICE DETAINEES ARE AUTHORIZED TO IMPOSE DISCIPLINE ON DETAINEES WHOSE BEHAVIOR IS NOT IN COMPLIANCE WITH FACILITY RULES AND REGULATIONS.

COMPONENTS	YES	NO	NA	REMARKS
The facility permits hearing postponements or continuances when conditions warrant such a continuance. Reasons are documented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The duration of punishment set by the OIC, as recommended by the disciplinary panel, does not exceed established sanctions. The maximum time in disciplinary segregation is limited to 60 days for a single offense.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Written procedures govern the handling of confidential-informant information. Standards include criteria for recognizing "substantial evidence"	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All forms relevant to the incident, investigation, committee/panel reports, etc., are completed and distributed as required.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Examination of relevant forms indicated they are completed and distributed as required.
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

Compliance inspection included a review of facility policies, disciplinary reports, hearing results, appeals and interviews with staff.

Facility rules stating disciplinary action should not be capricious or retaliatory are non-existent.

Written policy also does not include language that prohibits staff from imposing or permitting those sanctions which include, corporal punishment, deviation from normal food service, clothing deprivation, bedding deprivation, denial of personal hygiene items, loss of correspondence privileges, or deprivation of physical exercise.

Rights and responsibilities of the detainee are not conspicuously posted in English or Spanish.

(b)(6), (b)(7)(c) October 13, 2011

AUDITOR'S SIGNATURE /

(b)(6), (b)(7)(c)

EMERGENCY (CONTINGENCY) PLANS

POLICY ALL FACILITIES HOLDING ICE DETAINEES WILL RESPOND TO EMERGENCIES WITH A PREDETERMINED STANDARDIZED PLAN TO MINIMIZE THE HARMING OF HUMAN LIFE AND THE DESTRUCTION OF PROPERTY. IT IS RECOMMENDED THAT SPCs AND CDFs ENTER INTO AGREEMENT, VIA MEMORANDUM OF UNDERSTANDING (MOU), WITH FEDERAL, LOCAL AND STATE AGENCIES TO ASSIST IN TIMES OF EMERGENCY.

COMPONENTS	YES	NO	NA	REMARKS
Policy precludes detainees or detainee groups from exercising control or authority over other detainees.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There was no language in the existing facility policy and procedures which precludes detainees or detainee groups from exercising control or authority over other detainees.
Detainees are protected from: <ul style="list-style-type: none"> Personal abuse Corporal punishment Personal injury Disease Property damage Harassment from other detainees 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Staff is trained to identify signs of detainee unrest. <ul style="list-style-type: none"> What type of training and how often? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff does receive this training as part of the Academy curriculum and Field Training program offered during the first year of employment.
Staff effectively disseminates information on facility climate, detainee attitudes, and moods to the Officer In Charge (OIC)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
There is a designated person or persons responsible for emergency plans and their implementation. Sufficient time is allotted to the person or group for development and implementation of the plans.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Facility Division Chief is identified as the person responsible for emergency plans and their implementation. Sufficient time is allotted to this person for the implementation of these plans.
The plans address the following issues: <ul style="list-style-type: none"> Confidentiality Accountability (copies and storage locations) Annual review procedures and schedule Revisions 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Emergency plans are currently maintained in the Chief's office, Major's office and Captain's office. Confidentiality and accountability are not addressed in current policy or the emergency plans.
Contingency plans include a comprehensive general section with procedures applicable to most emergency situations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has cooperative contingency plans with applicable: <ul style="list-style-type: none"> Local law enforcement agencies State agencies Federal agencies 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Cooperative contingency plans exist with the Colorado Department of Corrections and the local Sheriff's Department in Denver.
All staff receives copies of Hostage Situation Management policy and procedures.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. The Hostage Situation Management policy and procedures is available in electronic format within the facility.
(b)(7)(e) (b)(7)(e) Within 24 hours after release, hostages are screened for medical and psychological effects.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. (b)(7)(e) (b)(7)(e) (b)(7)(e) After safe conclusion of the situation, hostages are screened for medical reasons. Policy does not address psychological screening for hostages at the conclusion of the event.
Emergency plans include emergency medical treatment for staff and detainees during and after an incident.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Medical treatment for staff and detainees will be provided both during and after the incident.

EMERGENCY (CONTINGENCY) PLANS

POLICY ALL FACILITIES HOLDING ICE DETAINEES WILL RESPOND TO EMERGENCIES WITH A PREDETERMINED STANDARDIZED PLAN TO MINIMIZE THE HARMING OF HUMAN LIFE AND THE DESTRUCTION OF PROPERTY. IT IS RECOMMENDED THAT SPCs AND CDFs ENTER INTO AGREEMENT, VIA MEMORANDUM OF UNDERSTANDING (MOU), WITH FEDERAL, LOCAL AND STATE AGENCIES TO ASSIST IN TIMES OF EMERGENCY.

COMPONENTS	YES	NO	NA	REMARKS
Food service maintains at least 3 days' worth of emergency meals for staff and detainees.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. A 30-day supply of emergency meals for staff and detainees is maintained by the facility.
Written plans identify locations of shut-off valves and switches for all utilities (water, gas, electric).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Written plans providing locations for the shut-off valves and switches for all utilities to include water, gas, and electric are available at this facility.
Written procedures cover: <ul style="list-style-type: none"> • Work/Food Strike • Disturbances • Escapes • Bomb Threats • Adverse Weather • Internal Searches • Facility Evacuation • Detainee Transportation System Plan • Internal Hostages • Civil Disturbances 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	All elements of this component are addressed in written policy and procedures with the exception of Civil Disturbances.

☒ **ACCEPTABLE**

 ☐ **DEFICIENT**

 ☐ **AT-RISK**

 ☐ **REPEAT FINDING**

REMARKS:

Compliance inspection included a review of facility policy, emergency plans, and Memorandums of Understanding and interviews with staff.

It was noted that current facility documents do not preclude detainees or detainee groups from exercising control or authority over other detainees.

The issues of confidentiality and accountability of emergency plans are not addressed in the current policy or the emergency plans.

The emergency plans do not include a provision for the handling of civil disturbances.

The facility did provide a draft policy which provides emergency guidelines for civil disturbance situations.

(b)(6), (b)(7)(c) / Oct
AUDITOR'S SIGNATURE

(b)(6), (b)(7)(c)

ENVIRONMENTAL HEALTH AND SAFETY

POLICY: EVERY FACILITY WILL CONTROL FLAMMABLE, TOXIC, AND CAUSTIC MATERIALS THROUGH A HAZARDOUS MATERIALS PROGRAM. THE PROGRAM WILL INCLUDE, AMONG OTHER THINGS, THE IDENTIFICATION AND LABELING OF HAZARDOUS MATERIALS IN ACCORDANCE WITH APPLICABLE STANDARDS (E.G., NATIONAL FIRE PROTECTION ASSOCIATION [NFPA]); IDENTIFICATION OF INCOMPATIBLE MATERIALS, AND SAFE-HANDLING PROCEDURES

COMPONENTS	YES	NO	NA	REMARKS
The facility has a system for storing, issuing, and maintaining inventories of hazardous materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility stores most hazardous materials in the maintenance area located outside the secure perimeter of the facility. Cleaning materials on the housing units are stored in locked closets in non-toxic forms. The officer on the housing unit dispenses the cleaning materials to detainees.
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"/>	Flammable, toxic and caustic materials are stored in the maintenance shop. Constant inventories are maintained on these 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"> The files list all storage areas, and include a plant diagram and legend. The MSDSs and other information in the files are available to personnel managing the facility's safety program. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Material Safety Data Sheets (MSDS) are maintained on file in each location where flammable, toxic and caustic materials are stored. The files do not list all storage areas or contain a diagram of the building and legend.
All personnel using flammable, toxic, and/or caustic substances follow the prescribed procedures. They: <ul style="list-style-type: none"> Wear personal protective equipment; and Report hazards and spills to the designated official. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The MSDSs are readily accessible to staff and detainees in work areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	MSDSs are available in each location where hazardous materials are stored.
Hazardous materials are always issued under proper supervision. <ul style="list-style-type: none"> Quantities are limited; and Staff always supervises detainees using these substances. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff supervises detainees using hazardous materials. Detainees only are allowed to use hazardous sanitation materials in the diluted form.
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"/>	Flammable and combustible materials are not stored within the secure perimeter of the facility. These materials stored in the maintenance shop are stored in cabinets behind a locked door and in original containers.
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"/>	Vents, return vents and air conditioning vents were not observed blocked during the inspection.
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"/>	

ENVIRONMENTAL HEALTH AND SAFETY

POLICY: EVERY FACILITY WILL CONTROL FLAMMABLE, TOXIC, AND CAUSTIC MATERIALS THROUGH A HAZARDOUS MATERIALS PROGRAM. THE PROGRAM WILL INCLUDE, AMONG OTHER THINGS, THE IDENTIFICATION AND LABELING OF HAZARDOUS MATERIALS IN ACCORDANCE WITH APPLICABLE STANDARDS (E.G., NATIONAL FIRE PROTECTION ASSOCIATION [NFPA]); IDENTIFICATION OF INCOMPATIBLE MATERIALS, AND SAFE-HANDLING PROCEDURES

COMPONENTS	YES	NO	NA	REMARKS
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"/>	Flammable and combustible materials are not stored within the secure perimeter of the facility. These materials stored in the maintenance shop are stored in cabinets, behind a locked door, and in original containers.
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"/>	The facility participates in the Green Denver program. All flammable, combustible and toxic liquids are disposed of by the Denver County Environmental Department.
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"/>	Products containing methyl alcohol are not used in the facility.
Every employee and detainee using flammable, toxic, or caustic materials receives advance training in their use, storage, and disposal.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Correctional officers and maintenance staff receive training in the use of flammable, toxic and caustic materials. Detainees also receive training prior to working in a job where these items are used.
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"/>	The facility inspects the fire sprinkler system annually as opposed to quarterly which is required by the NFPA 25.
A technically qualified officer conducts the fire and safety inspections.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Fire and safety inspections are conducted by a qualified officer. Documentation of the inspections is maintained and was reviewed during the inspection.
The Safety Office (or officer) maintains files of inspection reports.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Documentation of the inspections is maintained and was reviewed during the inspection.
The facility has an approved fire prevention, control, and evacuation plan.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility's fire prevention, control and evacuation plan is approved by the Denver Fire Department. The approval document was reviewed during the inspection.
The plan requires: <ul style="list-style-type: none"> • Monthly fire inspections; • Fire protection equipment strategically located throughout the facility; • Public posting of emergency plans with accessible building/room floor plans; • Exit signs and directional arrows; and • An area-specific exit diagram conspicuously posted in the diagrammed area. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Fire drills are conducted and documented monthly.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Fire drills are conducted monthly and the documentation of the monthly fire drills was reviewed during the inspection.
A sanitation program covers barbering operations.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Although clippers are made available to detainees for haircuts, the facility does not have a sanitation program covering the barbering operations.

ENVIRONMENTAL HEALTH AND SAFETY

POLICY: EVERY FACILITY WILL CONTROL FLAMMABLE, TOXIC, AND CAUSTIC MATERIALS THROUGH A HAZARDOUS MATERIALS PROGRAM. THE PROGRAM WILL INCLUDE, AMONG OTHER THINGS, THE IDENTIFICATION AND LABELING OF HAZARDOUS MATERIALS IN ACCORDANCE WITH APPLICABLE STANDARDS (E.G., NATIONAL FIRE PROTECTION ASSOCIATION [NFPA]); IDENTIFICATION OF INCOMPATIBLE MATERIALS, AND SAFE-HANDLING PROCEDURES

COMPONENTS	YES	NO	NA	REMARKS
The barber shop has the facilities and equipment necessary to meet sanitation requirements.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The facility does not have a designated barber shop.
The sanitation standards are conspicuously posted in the barbershop.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The facility does not have a set location for a barbershop and sanitation standards are not posted.
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"/>	Items representing potential safety and security risks are checked and inventoried daily.
Standard cleaning practices include: <ul style="list-style-type: none"> Using specified equipment; cleansers; disinfectants and detergents. An established schedule of cleaning and follow-up inspections. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The 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"/>	Spill kits are available throughout the facility.
A licensed medical waste contractor disposes of infectious/bio-hazardous waste.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Medical waste and infectious/biological hazardous waste are disposed under contract with Denver Health.
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"> At least monthly. The pest-control program includes preventative spraying for indigenous insects. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A licensed pest control professional provides monthly pest control services to the facility.
Drinking water and wastewater is routinely tested according to a fixed schedule.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility uses City of Denver water and wastewater services. The latest results of the testing of the water supply by Denver Water were reviewed during the inspection.
Emergency power generators are tested at least every two weeks. <ul style="list-style-type: none"> Other emergency systems and equipment receive testing at least quarterly. Testing is followed-up with timely corrective actions (repairs and replacements). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Emergency power generators are tested weekly. Other emergency systems are tested as required and at least quarterly. If needed, timely corrective action is taken to ensure all emergency systems are operable.


☒ ACCEPTABLE
☐ DEFICIENT
☐ AT-RISK
☐ REPEAT FINDING

REMARKS:

The facility utilizes a system for the storage, issuance and maintenance of constant inventories of flammable, toxic and caustic materials. All staff is trained in the handling of these materials, as are detainees who work in areas where the materials are used. These materials are identified, labeled and maintained in the original containers. Sanitation materials are issued to detainees in diluted forms by detention officers and used under supervision of officers.

MSDS files do not list all storage areas or include a diagram and legend.

The facility does not have a designated area for a barbershop. Areas where barbering occurs does not have hot and cold running water and the barbershop sanitation standards are not posted.

(b)(6), (b)(7)(c) October 12, 2011
AUDITOR'S SIGNATURE / D
 (b)(6), (b)(7)(c)

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	YES	NO	NA	REMARKS
The hold rooms are situated within the secure perimeter.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. This facility's hold rooms are situated within the secure perimeter.
The hold rooms are well ventilated well lighted, and all activating switches are located outside the room.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Hold rooms are well ventilated well lit, and all activating switches are located outside the room.
The hold rooms contain sufficient seating for the number of detainees held.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Hold rooms contain sufficient seating for the number of detainees held.
Bunks, cots, beds, or other related make-shift sleeping apparatus are precluded from use inside hold rooms.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Sleeping apparatus are precluded from use inside the hold rooms.
The walls and ceilings of the hold rooms are tamper and escape proof.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs; however, the walls and ceilings of the hold rooms are tamper and escape proof.
Individuals are not held in hold rooms for more than 12 hours.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Practice suggests that individuals are not held in the hold room for longer than 12 hours but facility policy does not prohibit this action. No logs exist to document time individual detainees are confined to a hold room.
Male and females are segregated from each other.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Female detainees are segregated from male detainees.
Detainees under the age of 18 are not held with adult detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	ICE detainees under the age of 18 are not housed at this facility. The facility does, however, house juveniles who are pending trial as an adult. These detainees are kept separated from adult detainees.
Detainees are provided with basic personal hygiene items such as water, soap, toilet paper, cups for water, feminine hygiene items, diapers and wipes.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In older facilities, officers are within visual or audible range to allow detainees access to toilet facilities on a regular basis.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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"/>	ICE detainees are not currently being held at this facility. Current practice of arriving prisoners includes a pat down and a routine strip search of all individuals.
Officers closely supervise the detention hold rooms using direct supervision (Irregular visual monitoring.). <ul style="list-style-type: none"> Hold rooms are irregularly monitored every 15 minutes. Unusual behavior or complaints are noted. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hold rooms at this facility are not currently monitored at 15 minute intervals, and this is not a policy requirement. There are no logs currently utilized that document when rounds are conducted by staff.
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"/>	

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	YES	NO	NA	REMARKS
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"/>	The section of this component that requires for the evacuation plan to include a designated officer to remove detainees from hold rooms in case of fire and/or building evacuation is specific to SPCs and CDFs. The facility has a written evacuation plan for the hold rooms. A designated officer is responsible for removing detainees from the hold rooms in case of a fire and/or building evacuation.
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 type="checkbox"/> ACCEPTABLE <input checked="" type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

Based on a review of current policy and procedures, interviews with staff, and examination of the hold room areas for both males and females, the facility is deficient with regard to this standard.

Although practice suggests that individuals are not held in the hold room for longer than 12 hours, facility policy does not prohibit this action. No logs exist to document time detainees spend in a hold room.

Hold rooms at this facility, are not currently monitored at 15-minute intervals, and there is no facility policy requirement to do so. There are no logs currently utilized that document when rounds are conducted by staff.

(b)(6), (b)(7)(c) / October 13
AUDITOR'S SIGNATURE / DATE

(b)(6), (b)(7)(c)

**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	YES	NO	NA	REMARKS
The security officer[s], or equivalent in IGSAs, has attended an approved locksmith training program.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Maintenance Officer assigned to locksmith duties was on leave and facility staff could not provide documentation to confirm attendance at an approved locksmith training program.
The security officer, or equivalent in IGSAs, has responsibility for all administrative duties and responsibilities relating to keys, locks etc.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No one person has direct responsibility for all administrative duties and responsibilities relating to keys, locks, etc.
The security officer, or equivalent in IGSAs, provides training to employees in key control.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The security officer, or equivalent in IGSAs, 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"/>	A review of maintenance documentation supports that a preventive maintenance program is in place at the facility.
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 IGSAs, develops policy and procedures to ensure safe combinations integrity.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	One safe was observed during the tour, but facility staff indicated that safe was not currently in use.
Only dead bolt or dead lock functions are used in detainee accessible areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Only authorized locks (as specified in the Detention Standard) are used in detainee accessible areas.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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"> Occupational Safety and Environmental Health Manual, Ch. 3; National Fire Protection Association Life Safety Code 101. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The operational keybox 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"/>	The facility currently uses a (b)(7)(e) (b)(7)(e) Units are installed in Main Control, Infirmary, Maintenance Shop, Food Service and Building 20 and are utilized for key storage, issue and return.
Procedures are in place to ensure that key rings are: <ul style="list-style-type: none"> Identifiable; The numbers of keys are cited; and Keys cannot be removed. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The numbers of keys are not cited on the key rings.
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"/>	

**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	YES	NO	NA	REMARKS
Individual gun lockers are provided. <ul style="list-style-type: none"> They are located in an area that permits constant officer observation. In an area that does not allow detainee or public access. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The facility has a key accountability policy and procedures to ensure key accountability. The keys are physically counted daily.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The requirement for keys to be physically counted daily is specific to SPCs and CDFs. The utilization of the (b)(7)(e) supports a key accountability program for the facility. Keys, however, are not physically counted daily.
All staff members are trained and held responsible for adhering to proper procedures for the handling of keys. <ul style="list-style-type: none"> Issued keys are returned immediately in the event an employee inadvertently carries a key ring home. When a key or key ring is lost, misplaced, or not accounted for, the shift supervisor is immediately notified. Detainees are not permitted to handle keys assigned to staff. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The bulleted sections of the component are specific to SPCs and CDFs. Staff receives training in the initial Academy instruction and also as part of the Field Officer Training program. Issued keys taken home are returned immediately, the shift supervisor is immediately notified when keys are missing. Detainees are not permitted to handle keys assigned to staff.

☒ ACCEPTABLE
☐ DEFICIENT
☐ AT-RISK
☐ REPEAT FINDING

REMARKS:

Review of facility policy and inventories, interviews with staff and examination of the Watchman Key System were used to determine compliance with the detention standard. The facility complies with the majority of the requirements with the following exceptions:

It was noted there is no specific person assigned the responsibilities for key and lock control at the facility.

No documentation was available to support the locksmith attended an approved locksmith training program.

The number of keys is not cited on the respective key rings located in the Key Watch units.

(b)(6), (b)(7)(c) / October 13
AUDITOR'S SIGNATURE / DATE

(b)(6), (b)(7)(c)

POPULATION COUNTS

POLICY: ALL DETENTION FACILITIES SHALL ENSURE AROUND-THE-CLOCK ACCOUNTABILITY FOR ALL DETAINEES. THIS REQUIRES THAT THEY CONDUCT AT LEAST ONE FORMAL COUNT OF THE DETAINEE POPULATION PER SHIFT, WITH ADDITIONAL FORMAL AND INFORMAL COUNTS CONDUCTED AS NECESSARY.

COMPONENTS	YES	NO	NA	REMARKS
Staff conduct a formal count at least once each shift.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility policy and procedures require three formal counts within a 24-hour period. Formal counts are conducted once on each shift.
Activities cease or are strictly controlled while a formal count is being conducted.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Activities do cease or are strictly controlled while a formal count is being conducted.
Certain operations cease during formal counts.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Certain operations do cease during formal counts; however, those individuals assigned to food service were not physically counted during an observed count.
All movement ceases for the duration of a formal count.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Movement does cease during the duration of a formal count.
Formal counts in all units take place simultaneously.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. The observed 3:00 PM count did occur in all units simultaneously.
Detainee participation in counts is prohibited.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Detainee participation in counts is prohibited.
A face-to-photo count follows each unsuccessful recount.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. A face-to-photo count would take place after each unsuccessful recount.
Officers positively identify each detainee before counting him/her as present.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Positive identification occurs at the 9:00 PM and 3:00 PM counts.
Written procedures cover informal and emergency counts. <ul style="list-style-type: none"> They are followed during informal counts and emergencies. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The control officer (or other designated position) maintains an out-count record of all detainees temporarily leaving the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
This training is documented in each officer's training folder.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Academy training and Field Officer Training programs includes documented instruction on taking counts.

☒ ACCEPTABLE
☐ DEFICIENT
☐ AT-RISK
☐ REPEAT FINDING

REMARKS:

Review of facility policy, review of count documentation, interviews with staff and observation of facility practices were used to determine compliance.

The facility complies with the requirements of this standard. There was one concern indicated as detainees assigned to food service were not physically counted in that area during an observed count. The facility relies on the housing unit's out count as correct and no mechanism was observed to reconcile those individuals working in food service.

(b)(6), (b)(7)(c) October 1
AUDITOR'S SIGNATURE / DATE

(b)(6), (b)(7)(c)

FOR OFFICIAL USE ONLY (LAW ENFORCEMENT SENSITIVE)

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	YES	NO	NA	REMARKS
Every fixed post has a set of post orders.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Each set contains the latest inserts (emergency memoranda, etc.) and revisions.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. It was noted that several post orders did not include updated revisions.
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"/>	The Division Chief is responsible for revisions based on recommendations for revisions from the Major and Captains.
The IGSA maintains a complete set (central file) of post orders.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A complete set of Post Orders is maintained in an electronic file.
The central file is accessible to all staff.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Staff has access to all post orders.
The OIC or Contract / IGSA equivalent initiates/authorizes all post-order changes.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. The Division Chief initiates and authorizes all post-order changes.
The OIC or Contract / IGSA equivalent has signed and dated the last page of every section.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. The last page of post orders for this facility is neither signed nor dated by the Division Chief.
A review/updating/reissuing of post orders occurs regularly and at a minimum, annually.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	An examination of several post orders indicate that there is no timely review or updating of post orders annually. Monitoring and control of the new key system was added as a responsibility to the Main Control staff over a year ago, but existing post orders do not include this change.
Procedures keep post orders and logbooks secure from detainees at all times.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Post orders and logbooks are kept secure from detainees at all times.
Every armed-post officer qualifies with the post weapon(s) before assuming post duty.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Every armed-post officer does qualify with the post weapon(s) before assuming post duty.
Armed-post post orders provide instructions for escape attempts.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The Main Gate and Transportation Post Orders do not include instructions for responding to escapes.
The post orders for housing units track the event schedule.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Post orders for housing units do track the event schedule.
Housing-unit post officers record all detainee activity in a log. The post order includes instructions on maintaining the logbook.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Detainee activities are recorded in a log and directions for maintaining this log are found in the post orders.
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				


REMARKS:

A review of the facility's policy and procedures, interviews with staff and examination of several post orders reveals basic overall compliance to the detention standard with a few exceptions.

The facility maintains a copy of all post orders on a computer which is available to all staff.

Upon examination of several post orders it was discovered revisions were not occurring in a timely manner, nor was there evidence to support that an annual review occurred.

The Main Gate and Transport Posts, which are armed assignments, do not include provisions for handling escapes.

(b)(6), (b)(7)(c) October 13, 2011
AUDITOR'S SIGNATURE / D. 
(b)(6), (b)(7)(c)

SECURITY INSPECTIONS

POLICY: POST ASSIGNMENTS IN THE FACILITY'S HIGH-RISK AREAS, WHERE SPECIAL SECURITY PROCEDURES MUST BE FOLLOWED, WILL BE RESTRICTED TO EXPERIENCED PERSONNEL WITH A THOROUGH GROUNDING IN FACILITY OPERATIONS.

COMPONENTS	YES	NO	NA	REMARKS
The facility has a comprehensive security inspection policy. The policy specifies: <ul style="list-style-type: none"> • Posts to be inspected; • Required inspection forms; • Frequency of inspections; • Guidelines for checking security features; and • Procedures for reporting weak spots, inconsistencies, and other areas needing improvement 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The portion of the component that requires for the security inspection policy to specify the posts to be inspected and the required inspection forms is specific to SPCs and CDFs. Facility policy and procedures provide provisions for the frequency of inspections; guidelines for checking security features, and procedures for reporting weak spots, inconsistencies, and other areas needing improvement. Posts to be inspected and required inspection forms are also a part of this policy.
Every officer is required to conduct a security check of his/her assigned area. The results are documented.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Officers are required to conduct security checks of their assigned areas and document the results.
Documentation of security inspections is kept on file.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Documentation of security inspections is maintained either by log or an electronic entry.
Procedures ensure that recurring problems and a failure to take corrective action are reported to the appropriate manager.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Procedures exist which ensure that recurring problems and a failure to take corrective action are reported to the appropriate manager.
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Main Control is staffed around the clock.
Policy restricts staff access to the Control Center.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Policy does restrict staff access to the Main Control unless authorized.
Detainees are restricted from access to the Control Center.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Detainees are restricted from access to Main Control.
Communications are centralized in the Control Center.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Communications are centralized in Main Control.
Officers monitor all vehicular traffic entering and leaving the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The requirement to monitor vehicles leaving the facility is specific to SPCs and CDFs. Officers do monitor all vehicular traffic entering the facility and also observe traffic leaving the facility.

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 maintains a log of all incoming and departing vehicles to sensitive areas of the facility. Each entry contains: <ul style="list-style-type: none"> The driver's name; Company represented; Vehicle contents; Delivery date and time; Date and time out; Vehicle license number; and Name of employee responsible for the vehicle during the visit 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Vehicles entering the sally port are identified by company represented, date and time of arrival and departure, and the vehicle license number. The driver's name, vehicle contents and name of employee responsible for the vehicle during the visit are not logged.
Officers thoroughly search each vehicle entering and leaving the facility.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Vehicles are not searched upon entering or leaving the facility.
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Tools being taken into the secure area of the facility are inventoried before entering and prior to departure.
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Staff performs searches of housing areas at irregular times.
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"/>	
Walls, fences, and exits, including exterior windows, are inspected for defects once each shift.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	(b)(7)(e)
Daily procedures include: <ul style="list-style-type: none"> Perimeter alarm system tests; Physical checks of the perimeter fence; and Documenting the results. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	(b)(7)(e)
Visitation areas receive frequent, irregular inspections.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

☒ ACCEPTABLE
☐ DEFICIENT
☐ AT-RISK
☐ REPEAT FINDING

REMARKS:

A review of facility policy and procedures, interview with staff, examination of inspection logs and related documentation supports compliance of this standard.

Walls, fences, and exits, including exterior windows, are inspected for defects

(b)(7)(e)

(b)(6), (b)(7)(c) / October

AUDITOR'S SIGNATURE / I

(b)(6), (b)(7)(c)

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	YES	NO	NA	REMARKS
The Administrative Segregation unit provides non-punitive protection from the general population and individuals undergoing disciplinary segregation. <ul style="list-style-type: none"> Detainees are placed in the SMU (administrative) in accordance with written criteria. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility policy provides guidelines for placing detainees in administrative segregation.
In exigent circumstances, staff may place a detainee in the SMU (administrative) before a written order has been approved. <ul style="list-style-type: none"> A copy of the order given to the detainee within 24 hours. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The OIC (or equivalent) regularly reviews the status of detainees in administrative detention. <ul style="list-style-type: none"> A supervisory officer conducts a review within 72 hours of the detainee's placement in the SMU (administrative). 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. A review occurs within 72 hours of the detainee's placement in administrative segregation and a supervisory officer conducts a review every seven days for the first two months of a detainee's confinement.
A supervisory officer conducts another review after the detainee has spent seven days in administrative segregation, and: <ul style="list-style-type: none"> Every week thereafter for the first month; and Every 30 days after the first month. Does each review include an interview with the detainee? Is a written record made of the decision and the justification? 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. A supervisory officer does conduct a review of a detainee's administrative segregation placement every seven days for the first two months, which includes an interview with the detainee and a written record made of the decision and the justification. Administrative confinement does not normally exceed 60 days.
The detainee is given a copy of the decision and justification for each review. <ul style="list-style-type: none"> The detainee is given an opportunity to appeal the reviewer's decision to someone else in the facility. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. The detainee does not receive a copy of the decision or justification for each review but always has the opportunity to file an appeal.
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"> 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. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. ICE staff would be notified if a detainee's stay in administrative detention exceeds 30 days. Staff indicated that administrative segregation does not normally exceed 60 days; but in the event it did, ICE would be notified.
The OIC (or equivalent) reviews the case of every detainee who objects to administrative segregation after 30 days in the SMU. <ul style="list-style-type: none"> A written record is made of the decision and the justification. The detainee receives a copy of this record. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs; however, a Captain would review the case of every detainee who objects to administrative segregation after 30 days, and provides a written record of the decision and justification to the detainee.
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Detainees are given the right to appeal the conclusions and recommendations of any review conducted after the detainee has remained in administrative segregation for seven consecutive days to the Deputy Chief.

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COMPONENTS	YES	NO	NA	REMARKS
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"> Well ventilated; Adequately lighted; Appropriately heated; and Maintained in a sanitary condition. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All cells are equipped with beds. <ul style="list-style-type: none"> Every bed 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. <ul style="list-style-type: none"> When occupancy exceeds recommended capacity, do basic living standards decline? Do criteria for objectively assessing living standards exist? If yes, are the criteria included in the written procedures? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The occupancy limit has not been exceeded by the facility.
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 receive three nutritious meals per day, from the general population's menu of the day. <ul style="list-style-type: none"> Do detainees eat only with disposable utensils? Is food ever used as punishment? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Nutritional meals are provided and detainees eat only with disposable utensils. Food is not used as punishment at this facility.
Each detainee maintains a normal level of personal hygiene in the SMU. <ul style="list-style-type: none"> The detainees have the opportunity to shower and shave at least three times a week. If not, explain. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Daily opportunities to shower and shave are provided.
The detainees are provided: <ul style="list-style-type: none"> Barbering services; Recreation privileges in accordance with the "Detainee Recreation" standard; Non-legal reading material; Religious material; The same correspondence privileges as detainees in the general population; Telephone access similar to that of the general population; and Personal legal material. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Barber clippers are provided to individuals in segregation upon request. Other services are provided as listed.
A health care professional visits every detainee at least three times a week. <ul style="list-style-type: none"> The shift supervisor visits each detainee daily. Weekends and holidays. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Health care providers visit the unit twice a day and supervisors are required to visit daily to include weekends and holidays.
Procedures comply with the "Visitation" standard. <ul style="list-style-type: none"> The detainee retains visiting privileges; and 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"/>	

**SPECIAL MANAGEMENT UNIT (SMU)
(ADMINISTRATIVE SEGREGATION)**

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COMPONENTS	YES	NO	NA	REMARKS
Detainees have the same law-library access as the general population. <ul style="list-style-type: none"> Are they required to use the law library <input checked="" type="checkbox"/> Separately, or <input type="checkbox"/> As a group? Are legal materials brought to them? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A West Law program is available via a mobile computer. Additional legal materials can be provided based upon request.
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. <ul style="list-style-type: none"> Staff completes the form at the end of each shift. CDFs and IGSA facilities use Form I-888 (or local equivalent). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The section of this component that requires the use of the "SMU Housing Record" (I-888) immediately upon a detainee's placement in the SMU and for staff to complete the form at the end of each shift is specific to SPCs and CDFs. A form I-888 is not used at this facility. Log books and electronic entries are utilized to document a detainee's placement and activities while in segregation.
Staff record whether the detainee ate, showered, exercised, and took any applicable medication during every shift. <ul style="list-style-type: none"> Staff logs record all pertinent information, e.g., a medical condition, suicidal/assaultive behavior, etc; The medical officer/health care professional signs each individual's record during each visit; and The housing officer initials the record when all detainee services are completed or at the end of the shift. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Log book entries include meals, showers, recreation, medication administered, medical and behavioral observations, signatures of visiting medical staff, and housing officer's initials when services are completed.
A new record is created for each week the detainee is in Administrative Segregation. <ul style="list-style-type: none"> The weekly records are retained in the SMU until the detainee's return to the general population. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Individual records are not maintained for each detainee, but activities are documented in a log book maintained in the SMU.
<input checked="" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

Review of facility policy and documents related to administrative segregation, interviews with staff, inspection of the SMU and observation of practices were used to determine compliance with the detention standard.

There are 16 cells in use at this facility for confining females in administrative segregation. Several cells in the HSU are used for the short term housing of males requiring administrative segregation. The facility utilizes a process which involves transfer to another nearby facility in Denver County, also under the authority of the Sheriff, for long term administrative segregation of male detainees.

While detainees in administrative segregation do have the same access to legal materials as detainees in general population, that access does not meet the detention standard's minimum requirements for legal materials that should be available for all detainees.

(b)(6), (b)(7)(c) / October
AUDITOR'S SIGNATURE /

(b)(6), (b)(7)(c)

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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	YES	NO	NA	REMARKS
Officers placing detainees in disciplinary segregation follow written procedures.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility policy and procedures provides guidelines for the placement of detainees in disciplinary segregation.
The sanctions for violations committed during one incident are limited to 60 days.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
A completed Disciplinary Segregation Order accompanies the detainee into the SMU. <ul style="list-style-type: none"> The detainee receives a copy of the order within 24 hours of placement in disciplinary segregation. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Standard procedures include reviewing the cases of individual detainees housed in disciplinary detention at set intervals. <ul style="list-style-type: none"> After each formal review, the detainee receives a written copy of the decision and supporting reasons. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The section of the component that requires for detainees to receive a copy of the decision and supporting reasons after each formal review is specific to SPCs and CDFs. A supervisor, sergeant and psychologist conduct reviews of individuals assigned to disciplinary segregation at seven day intervals. The detainee does not receive a written copy of the decision and supporting reasons.
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"/>	Commissary privileges are limited and recreation can be reduced as part of disciplinary sanctions.
Living conditions in disciplinary SMUs remain the same regardless of behavior. <ul style="list-style-type: none"> If no, does staff prepare written documentation for this action? Does the OIC sign to indicate approval. 	<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"/>	
The quarters used for segregation are: <ul style="list-style-type: none"> Well-ventilated. Adequately lighted. Appropriately heated. Maintained in a sanitary condition. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All cells are equipped with beds 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"> Does the OIC approve excess occupancy on a temporary basis? 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Occupancy limits are not exceeded at this facility.
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"/>	

**SPECIAL MANAGEMENT UNIT
(DISCIPLINARY SEGREGATION)**

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COMPONENTS	YES	NO	NA	REMARKS
<p>Detainees in the SMU receive three nutritious meals per day, selected from the Food Service's menu of the day.</p> <ul style="list-style-type: none"> Food is not used as punishment. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Three nutritional meals are provided and food is not used as punishment.
<p>Detainees are allowed to maintain a normal level of personal hygiene, including the opportunity to shower and shave at least three times/week.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>Detainees receive, unless documented as a threat to security:</p> <ul style="list-style-type: none"> Barbering services; Recreation privileges; Other-than-legal reading material; Religious material; The same correspondence privileges as other detainees; and Personal legal material. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Barber clippers are provided to the individual upon request. Other services are provided to detainees as required.
<p>When phone access is limited by number or type of calls, the following areas are exempt:</p> <ul style="list-style-type: none"> Calls about the detainee's immigration case or other legal matters; Calls to consular/embassy officials; and Calls during family emergencies (as determined by the OIC/Warden). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>A health care professional visits every detainee in disciplinary segregation every week day.</p> <ul style="list-style-type: none"> The shift supervisor visits each segregated detainee daily Weekends and holidays. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A health care provider visits detainees in disciplinary segregation twice daily. Shift supervisors are also required to visit daily to include weekends and holidays.
<p>SMU detainees are allowed visitors, in accordance with the "Visitation" standard.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>SMU detainees receive legal visits, as provided in the "Visitation" standard.</p> <ul style="list-style-type: none"> Legal service providers are notified of security concerns arising before a visit. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>Visits from clergy are allowed.</p> <ul style="list-style-type: none"> The clergy member is given the option of visiting/not visiting the segregated detainee. Violent/uncooperative detainees are denied access to religious services when safety and security would otherwise be affected. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>SMU detainees have law library access.</p> <ul style="list-style-type: none"> Violent/uncooperative detainees retain access to the law library unless adjudicated a security threat in writing. Legal material brought to individuals in the SMU on a case-by-case basis. Staff documents every incident of denied access to the law library. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Access to West Law resources are provided upon request. Additional legal materials may be requested.
<p>All detainee-related activities are documented, e.g. meals served, recreation activities, visitors, etc.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Log books are used to record detainee related activities while assigned to this unit.

**SPECIAL MANAGEMENT UNIT
(DISCIPLINARY SEGREGATION)**

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COMPONENTS	YES	NO	NA	REMARKS
<p>The SPCs, the Special Management Housing Unit Record (I-888 or equivalent), is prepared as soon as the detainee is placed in the SMU.</p> <ul style="list-style-type: none"> All I-888s are filled out by the end of each shift. The CDF/IGSA facility use Form. I-888 (or equivalent local form). 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The section of the component that requires staff to prepare the Special Management Housing Unit Record (I-888 or equivalent) as soon as the detainee is placed in the SMU and that completion of the form is by the end of each shift is specific to SPCs and CDFs. Log books and electronic entries are utilized to document detainee placement in disciplinary segregation and activities. Form I-888 is not utilized by the facility.</p>
<p>SMU staff record whether the detainee ate, showered, exercised, took medication, etc.</p> <ul style="list-style-type: none"> Details about the detainee logged, e.g., a medical condition, suicidal/violent behavior, etc. The health care official sign individual records after each visit. The housing officer initials the record when all detainee services are completed or at the end of the shift. A new record is created weekly for each detainee in the SMU. The SMU retains these records until the detainee leaves the SMU. 	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>This component is only applicable for SPCs and CDFs, however, the elements of this standard. SMU staff do record whether the detainee ate, showered, exercised, took medication etc, but this information is maintained in the SMU log book or electronic entry. Information regarding the detainee's behavior would also be documented in the log. Since there are no individual records maintained, the health care official or housing officer does not sign the record. Individual records are not maintained or created weekly.</p>

☒ ACCEPTABLE
 ☐ DEFICIENT
 ☐ AT-RISK
 ☐ REPEAT FINDING

REMARKS:

Review of facility policy and documents related to disciplinary segregation, interviews with staff, inspection of the SMU and observation of practices were used to determine compliance with the detention standard.

There are 16 cells currently in use for the female population of this facility; several cells have been identified for use in the medical department for the short term housing of males requiring assignment to disciplinary segregation. The facility utilizes a process for males which includes the transfer to another nearby facility in Denver County, also under the authority of the Sheriff, for long term disciplinary placement (more than 15 days) for males.

(b)(6), (b)(7)(c) / Oct
AUDITOR'S SIGNATURE

(b)(6), (b)(7)(c)

TOOL CONTROL

POLICY: IT IS THE POLICY OF ALL FACILITIES THAT ALL EMPLOYEES SHALL BE RESPONSIBLE FOR COMPLYING WITH THE TOOL CONTROL POLICY. THE MAINTENANCE SUPERVISOR SHALL MAINTAIN A COMPUTER GENERATED OR TYPEWRITTEN MASTER INVENTORY LIST OF TOOLS AND EQUIPMENT AND THE LOCATION IN WHICH TOOLS ARE STORED. THESE INVENTORIES SHALL BE CURRENT, FILED AND READILY AVAILABLE FOR TOOL INVENTORY AND ACCOUNTABILITY DURING AN AUDIT.

COMPONENTS	YES	NO	NA	REMARKS
There is an individual who is responsible for developing a tool control procedure and an inspection system to insure accountability.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No one person has direct responsibility for the tool control program at the facility.
Department heads are responsible for implementing this standard in their departments.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Department heads are responsible for implementing this standard in their respective departments.
Tool inventories are required for the: <ul style="list-style-type: none"> Maintenance Department; Medial Department; Food Service Department; Electronics Shop; Recreation Department; and Armory. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Tool inventories were provided for the Maintenance, Medical and Food Service Departments. There is no Electronic shop at the facility and tools are not maintained by Recreation or the Armory.
The facility has a policy for the regular inventory of all tools. <ul style="list-style-type: none"> The policy sets minimum time lines for physical inventory and all necessary documentation. ICE facilities use AMIS bar code labels when required. 	<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"> Restricted (dangerous/hazardous); and Non-Restricted (non-hazardous). 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The section of the component that requires tools to be classified as restricted and non-restricted is specific to SPCs and CDFs. The facility does not use a tool classification system.
Department heads are responsible for implementing tool-control procedures.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This component is only applicable for SPCs and CDFs. Department heads are responsible for implementing tool control procedures.
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"/>	Maintenance tools are maintained in a shop outside the facility, and tools brought into the facility are inventoried and monitored. Tools maintained in the Maintenance Department were engraved.
The facility has an approved tool storage system. <ul style="list-style-type: none"> The system ensures that all stored tools are accountable. Commonly used tools (tools that can be mounted) are stored in such a way that missing tool is readily notice. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Shadow boards were observed and utilized in both the Maintenance and Food Service departments.
Each facility has procedures for the issuance of tools to staff and detainees.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Maintenance and Food Service departments have procedures in place for issuing tools to both staff and detainees.
The facility has policies and procedures to address the issue of lost tools. The policy and procedures include: <ul style="list-style-type: none"> Verbal and written notification; Procedures for detainee access; and Necessary documentation/review for all incidents of lost tools. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Broken or worn out tools are surveyed and disposed of in an appropriate and secure manner.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

TOOL CONTROL

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COMPONENTS	YES	NO	NA	REMARKS
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="checked" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="checked" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

A review of facility policy and procedures, interviews with staff and examination of existing documentation supports compliance of the Tool Control standard.

The facility does not assign responsibilities for tool control to one individual; nor do they have a tool classification system. Department heads are responsible for implementing tool control procedures in their respective departments.

(b)(6), (b)(7)(c) / October 1
AUDITOR'S SIGNATURE / DATE

(b)(6), (b)(7)(c)

**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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Supervisors maintain records for each vehicle operator.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Officers use a checklist during every vehicle inspection. <ul style="list-style-type: none"> Officers report deficiencies affecting operability; and Deficiencies are corrected before the vehicle goes back into service. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Transporting officers: <ul style="list-style-type: none"> Limit driving time to 10 hours in any 15 hour period; Drive only after eight consecutive off-duty hours; Do not receive transportation assignments after having been on duty, in any capacity, for 15 hours; Drive a 50-hour maximum in a given work week; a 70-hour maximum during eight consecutive days; During emergency conditions (including bad weather), officers may drive as long as necessary and safe to reach a safe area—exceeding the 10-hour limit. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(b)(7)(e) officers with valid CDLs required in any bus transporting detainees. <ul style="list-style-type: none"> When buses travel in tandem with detainees, there are (b)(7)(e) qualified officers per vehicle. An unaccompanied driver may transport an empty vehicle. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Before the start of each detail, the vehicle is thoroughly searched.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Positive identification of all detainees being transported is confirmed.	<input 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 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 type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(b)(7)(e)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The vehicle crew conducts a visual count once all passengers are on board and seated. <ul style="list-style-type: none"> Additional visual counts are made whenever the vehicle makes a scheduled or unscheduled stop. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Policies and procedures are in place addressing the use of restraining equipment on transportation vehicles.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Officers ensure that no one contacts the detainees. <ul style="list-style-type: none"> One officer remains in the vehicle at all times when detainees are present. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**TRANSPORTATION
(LAND TRANSPORTATION)**

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☒ **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
Meals are provided during long distance transfers. <ul style="list-style-type: none"> The meals meet the minimum dietary standards, as identified by dietitians utilized by ICE. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The vehicle crew inspects all Food Service pickups before accepting delivery (food wrapping, portions, quality, quantity, thermos-transport containers, etc.). <ul style="list-style-type: none"> Before accepting the meals, the vehicle crew raises and resolves questions, concerns, or discrepancies with the Food Service representative; Basins, latrines, and drinking-water containers/dispensers are cleaned and sanitized on a fixed schedule. 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Vehicles have: <ul style="list-style-type: none"> (b)(7)(e) 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
The vehicles are clean and sanitary at all times.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Personal property of a detainee transferring to another facility is: <ul style="list-style-type: none"> Inventoried; Inspected; and Accompanies the detainee. 	<input 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"> Attack Escape Hostage-taking Detainee sickness Detainee death Vehicle fire Riot Traffic accident Mechanical problems Natural disasters Severe weather Passenger list includes women or minors 	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

☐ **ACCEPTABLE**

☐ **DEFICIENT**

☐ **AT-RISK**

☐ **REPEAT FINDING**

REMARKS:

Based on interviews with facility and ICE staff, it was determined that transportation of ICE detainees is arranged and coordinated by ICE personnel.

(b)(6), (b)(7)(c) October
AUDITOR'S SIGNATURE / D

(b)(6), (b)(7)(c)

FOR OFFICIAL USE ONLY (LAW ENFORCEMENT SENSITIVE)

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"/>	Facility policy and procedures do exist which provide guidelines for use of force situations at the facility.
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 type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Policy does not include language that supports a calculated approach instead of an immediate use of force.
The facility subscribes to the prescribed Confrontation Avoidance Procedures. <ul style="list-style-type: none"> Ranking detention official, health professional, and others confer before every calculated use of force. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Although medical treatment is provided after a use of force event, staff indicates the health professionals are not normally contacted before a calculated 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"> Under staff supervision. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Training curriculums were reviewed which support that staff receive training in team techniques.
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"/>	A review of documents suggests all incidents are documented by involved staff and reviewed by senior staff.
Staff: <ul style="list-style-type: none"> Do not use force as punishment; Attempt to gain the detainee's voluntary cooperation before resorting to force; Use only as much force as necessary to control the detainee; and Use restraints only when other non-confrontational means, including verbal persuasion, have failed or are impractical. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Medication may only be used for restraint purposes when authorized by the Medical Authority as medically necessary.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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"/>	

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
Standard procedures associated with using four-point restraints include: <ul style="list-style-type: none"> Soft restraints (e.g., vinyl); Dressing the detainee appropriately for the temperature; A bed, mattress, and blanket/sheet; Checking the detainee at least every 15 minutes; Logging each check; Turning the bed-restrained detainee often enough to prevent soreness or stiffness; Medical evaluation of the restrained detainee twice per eight-hour shift; and When qualified medical staff is not immediately available, staff position the detainee "face-up". 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The facility currently utilizes (b)(7)(e)
The shift supervisor monitors the detainee's position/condition every two hours. <ul style="list-style-type: none"> He/she allows the detainee to use the rest room at these times under safeguards. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
All detainee checks are logged.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In immediate-use-of-force situations, staff contacts medical staff once the detainee is under control.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Medical treatment is provided once the detainee is under control.
When the OIC authorizes use of non-lethal weapons: <ul style="list-style-type: none"> Medical staff is consulted before staff use pepper spray/non-lethal weapons. Medical staff reviews the detainee's medical file before use of a non-lethal weapon is authorized. 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Medical is not always consulted prior to the use of non-lethal weapons.
Special precautions are taken when restraining pregnant detainees. <ul style="list-style-type: none"> Medical personnel are consulted 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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"/>	Senior staff reviews all incidents involving force and non-routine application of restraints.
All officers receive training in self-defense, confrontation-avoidance techniques and the use of force to control detainees. <ul style="list-style-type: none"> Specialized training is given and Officers are certified in all devices they use. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
In SPCs, 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"/>	The requirement to use the "Use of Force form" is specific to SPCs. An equivalent form is used by this facility.

☐ ACCEPTABLE
☒ DEFICIENT
☐ AT-RISK
☐ REPEAT FINDING

REMARKS:

Review of facility policy, review of documented use of force incidents and training curriculum, and interviews with staff were used to evaluate compliance with this standard.

Facility policy does not include provisions supporting confrontation avoidance techniques or a calculated rather than immediate use of force be used when possible.

Medical staff is not always consulted prior to the authorized use of non-lethal weapons. The detainee's medical file is not reviewed prior to calculated use of force situations.

The facility utilizes (b)(7)(e) There are no other chemicals available at the facility. Facility policy does not prohibit the use of (b)(7)(E)

(b)(7)(e) are routinely issued and used by staff at this facility. There is no current prohibition on the use of this equipment on ICE detainees by policy.

(b)(7)(e) are also issued to staff for use of force situations, which is currently not on the approved ICE list of non-lethal equipment. There is no prohibition regarding use of these weapons on ICE detainees.

Upon review of policy and staff training curriculums, the facility was previously utilizing (b)(7)(E) is a permitted Use of Force option. This use of force technique is prohibited by the detention standard. Based on a 2010 incident at another facility in the county and pursuant to notification to all officers effective August 22, 2010, the use of this technique in use of force situations was suspended. The restraint technique is not currently being taught in the Use of Force curriculum. It should be noted that the matter is under review by Denver County officials and a decision has not been made regarding future use of the technique.

The facility procedures violate many essential requirements of the detention standard and have been rated deficient as a result.

(b)(6), (b)(7)(c) / Octob
AUDITOR'S SIGNATURE

(b)(6), (b)(7)(c)

STAFF DETAINEE COMMUNICATIONS

POLICY: PROCEDURES MUST BE IN PLACE TO ALLOW FOR FORMAL AND INFORMAL CONTACT BETWEEN KEY FACILITY STAFF AND ICE STAFF AND ICE DETAINEE AND TO PERMIT DETAINEES TO MAKE WRITTEN REQUESTS TO ICE STAFF AND RECEIVE AN ANSWER IN AN ACCEPTABLE TIME FRAME.

COMPONENTS	YES	NO	NA	REMARKS
The ICE Field Office Director ensures that weekly announced and unannounced visits occur at the IGSA.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The section of this component that requires weekly announced and unannounced visits is specific to SPCs and CDFs. There have been no ICE detainees at this facility during the past year. The IEA assigned to this facility advised he has standing orders to conduct announced and unannounced visits at this facility 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"/>	
Scheduled visits are posted in ICE detainee areas.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A visiting schedule is not posted.
Visiting staff observe and note current climate and conditions of confinement at each IGSA.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICE information request Forms are available at the IGSA for use by ICE detainees.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	There are no ICE information request forms available at the facility.
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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There have been no detainee requests during this past reporting period because there have been no ICE detainees housed at the facility in the past year.
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"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

ICE maintains good presence at the facility and has procedures in place to ensure good staff-detainee communications if and when ICE detainees are housed at this facility.

ICE has not posted a schedule of ICE visits in detainee living areas, and there are no ICE Information Request Forms available at the facility. It should be noted that there have been no ICE detainees housed at the facility this past reporting period.

(b)(6), (b)(7)(c) / October
AUDITOR'S SIGNATURE / DATE

(b)(6), (b)(7)(c)

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	YES	NO	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"> The notification is recorded in the detainee's file; and When the A File is not available, notification is noted within DACS 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	DACS has been replaced by the Enforcement Alien Removal Module (EARM).
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"/>	
Facility policy mandates that: <ul style="list-style-type: none"> Times and transfer plans are never discussed with the detainee prior to transfer; The detainee is not notified of the transfer until immediately prior to departing the facility; and The detainee is not permitted to make any phone calls or have contact with any detainee in the general population. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility policy and procedure addresses the confidentiality and security of detainee transfers.
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"/>	
For medical transfers: <ul style="list-style-type: none"> The Detainee Immigration Health Service (or IGSA) (DIHS) Medical Director or designee approves the transfer; Medical transfers are coordinated through the local ICE office; and A medical transfer summary is completed and accompanies the detainee. 	<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 type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	This facility does not have ICHS (formerly DIHS) staff assigned.
For medical transfers, transporting officers receive instructions regarding medical issues.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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"/>	
Transfer and documentary procedures outlined in Section C and D are followed.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Meals are provided when transfers occur during normally schedule meal times.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
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"/>	

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	YES	NO	NA	REMARKS
Files are forwarded to the receiving office via overnight mail no later than one business day following the transfer.	<input checked="checked" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="checked" type="checkbox"/> ACCEPTABLE <input type="checkbox"/> DEFICIENT <input type="checkbox"/> AT-RISK <input type="checkbox"/> REPEAT FINDING				

REMARKS:

The facility and ICE staff will coordinate detainee transfers as required.

Confidentiality and security of transfer information is adequately addressed.

Medical needs, dietary requirements, file transfer, and detainee property procedures are all in compliance with the detention standard.

(b)(6), (b)(7)(c) / October
AUDITOR'S SIGNATURE / D

(b)(6), (b)(7)(c)