

2.9 Tool Control

Introduction

This U.S. Immigration and Customs Enforcement (ICE) Family Residential Standard protects residents, staff, contractors, and volunteers from harm and contributes to orderly Center operations by maintaining control of tools, culinary utensils, and medical and dental instruments, equipment, and supplies to ensure accountability and prevent misuse.

Various terms used in this standard may be defined in the ICE Family Residential Standard on *Definitions*.

Program Philosophy

The requirements of this standard must be implemented in accordance with the ICE Family Residential Standard on *Program Philosophy, Goals, and Expected Outcomes*.

A. Language Access and Disability Requirements

Centers will adhere to the language access and disability laws, regulations, responsibilities, requirements, and laws cited in the ICE Family Residential Standard on *Program Philosophy, Goals, and Expected Outcomes* and the ICE Family Residential Standard on *Disability Identification, Assessment, and Accommodation*. These requirements must be promulgated in all Center policies, practices, and operations and its themes must be fully incorporated into every Center activity. This is of critical importance and will directly impact resident life, health, and safety.

Expected Outcomes

The expected outcomes of this standard are as follows (specific requirements are defined in the Expected Practices section in this standard):

1. Centers will continually control and account for tools, maintenance implements, culinary utensils (not including basic eating utensils), and medical and dental instruments, equipment, and supplies (particularly syringes, needles, and other sharp objects) to ensure the safe and orderly operation of the Center.

Standards Affected

This standard replaces the ICE Family Residential Standard on *Tool Control* dated 12/21/2007.

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Expected Practices

A. Control, Care, and Accountability for Tools

Tools, maintenance implements, culinary utensils (not basic eating utensils), and medical and dental instruments, equipment, and supplies (particularly syringes, needles, and other sharp objects) must be controlled and their use by residents must be supervised.

Tool control and care ensures the following:

- Prevents the use of tools as weapons, and in other ways that can be hazardous to individual safety or safe and secure Center operations;
- Improves the appearance of shop and construction areas;
- Ensures that tools are in good repair when needed;
- Reduces costs of tool maintenance and inventory; and
- Instructs resident workers on principles of tool accountability and responsibility.

B. Written Policy and Procedures Required

Each Center Administrator will develop and implement a written tool control system that:

- Identifies a staff position responsible;
- Develops and implements an accountability system for tool control procedures; and
- Establishes an inspection system to ensure accountability.

The Center Administrator will delegate these responsibilities to the security staff and also will assign, in writing:

- The duties of tool control to a staff member of the Center maintenance department;
- A tool classification system;
- Individual tool inventories for all departments that have tools stored in their work or storage areas;
- Procedures for marking tools so they are readily identifiable;
- Procedures for storing tools;
- Procedures and schedules for regular inventories of tools;
- Procedures for documenting tool distribution to staff and resident workers;
- Procedures governing lost tools;
- Procedures to control ladders, extension cords, and ropes;
- Procedures for surveying and destroying excess, broken, or worn out tools; and
- Procedures for inspecting and controlling tools and equipment brought into the Center temporarily (e.g., repair and maintenance workers, sports teams).

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C. Tool Classification

The Center will develop and implement a tool classification system. Tools are assigned one of two categories:

- Restricted (class “R”)—dangerous/hazardous tools; and
- Non-restricted—non-hazardous tools.

Class “R” tools include:

- Tools too dangerous for residents to handle without constant staff supervision;
- Tools to which resident access is prohibited;
- Tools that are useful in making weapons, could double as weapons, or are capable of causing serious bodily harm;
- Power hand tools, with or without cords; and
- Other tools that are considered hazardous to safe and secure Center operations or personal safety.

Examples of restricted tools include:

- Metal cutting blades;
- Mixing chambers;
- Bolt cutters;
- Diamond-tipped tools;
- Core drills;
- Drills;
- Circular saws; and
- Knives and other sharp culinary utensils.

The Center Administrator will establish a policy document on Center tool use and storage that includes separate, comprehensive, alphabetical lists of both restricted and non-restricted tools.

The lists will indicate which of the listed tools are available onsite, describe them by type, and specify tool sizes.

The lists will be kept current by formatting them as attachments to the policy document, and will be maintained and updated electronically weekly.

The lists will be kept current and will be distributed at least quarterly.

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

- Drill bits, metal/wood 1/32–7/8 inch;
- Drill bits, metal/wood 7/16–7/8 inch;

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- Wrench, combination box/open end 1/4–7/16 inch; or
- Wrench, combination box/open end 7/16–7/8 inch.

When a single set listing is insufficiently clear, each tool must be listed separately. For example, if a Center had:

- A single “wrench, combination box/open end, 1-7/8 inches” but not the smaller or larger sizes; or
- Several wrenches in different sizes, but without standard size differences.

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

Staff will remove restricted tools from work areas at the end of each workday for safekeeping in a secure tool room or the control center.

E. Acetylene

Staff will:

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

F. Departmental Responsibilities

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

- Center maintenance department;
- Medical unit;
- Food service department;
- Electronics shop; and
- Recreation department.

Each department head is responsible for implementing tool control procedures in that department, and the following procedures are specifically required of the Center Maintenance Department Head, Health Services Administrator (HSA), food service manager, electronics technician, and recreation specialist.

- Prepare a computer-generated inventory of all class “R” tools in the maintenance restricted-tool room, the medical unit, the food service department, the electronics work area, and recreation areas;
- Post a copy of the class “R” tool inventory with the equipment in a prominent position in the equipment area;

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- Submit a second copy of the inventory to the security staff;
- Retain a third copy in the department;
- Review and when necessary revise the class “R” tool inventory on a regular schedule:
 - Weekly—food service;
 - Monthly—Center maintenance, medical; and
 - Quarterly—electronics work area, recreation areas.
- Forward a copy of the inventory report to the Center Administrator;
- Report missing tools in accordance with procedures specified below; and
- Include on all inventory sheets the date of issuance/revision.

G. Tool Identification

The Center Administrator will establish written procedures for marking tools and making them readily identifiable.

The tool control staff will mark every tool in every work location with a symbol signifying its storage location (e.g., “kitchen,” “control center”). Some tools will require Automated Movement and Identification System (AMIS) bar-coding.

Tools too small, fragile, or otherwise susceptible to damage (e.g., surgical instruments, micrometers, small drill bits) will be inventoried and kept in locked storage when not in use.

H. Storage in Work Areas

The Center Administrator will establish written procedures for a tool-storage system that ensures accountability. Commonly used, mounted tools will be stored so that a tool’s disappearance will be easily visible to staff.

Work-detail supervisors will account for all tools at the end of every work period.

Shadow boards will provide storage for tools that can be mounted, as follows:

- One tool per shadow;
- Tool and shadow identical in size and shape;
- Color-coded:
 - White backgrounds for all shadow boards;
 - Red shadows for restricted tools; and
 - Black shadows for non-restricted tools.
- When a tool is removed from the inventory, its shadow will likewise be removed from the shadow board;
- Shadow boards accessible to residents will have expanded-metal covers and will be locked when not in use;

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- All restricted tools will be secured in a central tool room, isolated from the living and activity areas;
- If maintenance workers are assigned personal shadow boards, then the boards must have expanded-metal covers; and
- Infrequently used tools may be stored in individual tool cages with shadow boards, secured by hasp and padlock:
 - They must be included in the regular inventory checks;
 - A tag will indicate the tool has been removed from its cage and a sign-in/out board will indicate area, date, times, and user;
 - The staff member responsible will maintain an inventory sheet in the tool cage and provide a copy to the tool control staff;
 - Tools not adaptable to shadow boards will be kept in a locked drawer or cabinet;
 - Staff will not open sterile packs for inventory or any other non-medical reason, except when tampering or theft is suspected, in which case staff will contact the health services department before opening a pack from which instruments may have been removed. To prevent such incidents, sterile packs will be stored under lock and key at all times; and
 - Individual toolboxes containing tools used on a daily basis must be secured with hasp and padlock. The individual responsible for the toolbox will keep an inventory sheet in the toolbox, and the tool control staff will maintain copies of all such inventory sheets.

I. Receipt of Tools

If the warehouse is located outside the secure perimeter, then the warehouse will receive all tool deliveries.

If the warehouse is located within the secure perimeter, then the Center Administrator will develop site-specific procedures (e.g., storing the tools at the rear sally port until picked up and receipted by the tool control staff). The tool control staff will place certain tools (e.g., band saw blades, files, and all restricted tools) immediately in secure storage.

The tool control staff will mark and inventory new tools prior to placing them in service. Inventories that include any portable power tools will provide brand name, model, size, description, and inventory control/AMIS number.

J. Tool Inventories

The Center Administrator will schedule and establish procedures for the quarterly inventorying of all tools. Centers will use inventory control number/AMIS bar code labels as necessary.

Inventory maintenance at each work location is the responsibility of the Detail Supervisor and Department Head.

The Work Detail Supervisor or staff member assigned a toolbox will be accountable for the control of his/her assigned tools on a daily basis.

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Any tool permanently removed from service will be turned in to the tool control staff for record keeping and safe disposal.

Tool inventories will be numbered and posted conspicuously on all corresponding shadow boards, toolboxes, and tool kits. While all posted inventories must be accurate, only the Master Tool Inventory Sheet in the office of the security staff requires the certifiers' signatures.

Tools in current use will be inventoried in accordance with the following schedule:

Annually. Once each year, at a minimum, the tool control staff and employees responsible for tools will together inventory all tools/equipment onsite.

Each inventory-taker will certify with name, title, and identification number the accuracy of that inventory. Certification must be approved by the Center Maintenance Supervisor and security staff.

The tool control staff will provide security staff a complete set of the separate inventories (e.g., restricted tools, non-restricted tools) referred to as the Master Tool Inventory Sheet.

Quarterly. To ensure the accuracy and completeness of current inventory listings and check the condition of shadows and markings, every three months the employees responsible for tools will conduct verification inventories and initial the appropriate column on the Master Tool Inventory Sheet in the office of the security staff.

Security staff will assign one staff member to monitor the quarterly inventories. This person will initial the bottom of each form clearly, certifying that the records have been checked and all inventories completed.

Inventory Files. The Center Administrator's designee will maintain a separate file folder for each shop or area where tools are stored.

The left side of the folder will contain the Master Tool Inventory Sheet(s).

When an addition or deletion is made to the master inventory, the page on which the change is made will be retyped or reprinted completely and inserted into the master inventory. Staff will not destroy any of the original pages, but will move them to the right side of the folder for future reference.

The right side of the folder also will contain documentation including, but not limited to:

- Lost or missing tool reports;
- Requests for inventory additions or deletions;
- Survey requests and reports;
- Store room requisition forms; and
- Any other document directly related to site-specific tool control procedures.

When the annual inventory is completed, staff will place the form on the left side of the folder and move the previous year's to the right side. Each folder will contain the materials for the current year plus the preceding two years, with a divider to separate the annual records.

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Tools Used by Contractors. Staff will conduct and retain an inventory of all contractor tools upon their arrival and departure. Staff will report discrepancies immediately to the shift supervisor. While contractors are temporarily working in the Center, staff will accompany them to ensure that security and safety precautions and procedures are followed at all times. The security staff will establish control procedures, particularly for restricted tools. The security staff, Center Maintenance Supervisor, and Construction Foreman will maintain copies of all such inventories and control procedures.

Tools Purchased from Surplus Property. Tools purchased or acquired from surplus property will be stored in the designated secure storage area. The responsible employee will maintain a continual inventory of unmarked or excess tools returned to secure storage for issue or reissue. The tool control staff has sole authority to draw tools from this source. Any such tools kept in the tool control storage area will be registered in a continual inventory.

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

Control, inventory, maintenance, and destruction of ICE firearms are governed by the ICE Interim Firearms Policy (7/7/2004).

Tool and Equipment Accountability. All tools and equipment will be accounted for and documented on a regular basis.

K. Issuing Tools

Each Center will have procedures in place for the issuance of tools to staff and residents; security issues of restricted and unrestricted tools; and control of ladders, extension cords, ropes, and hoses.

The security staff will issue a restricted tool only to the individual who will be using it.

Residents may use non-restricted tools under intermittent supervision; however, the detail supervisor will account for all tools at the end of every work period.

A metal or plastic chit receipt will be taken for all tools issued, and when a tool is issued from a shadow board, the receipt chit will be visible on the shadow board.

The Center Administrator will establish site-specific procedures for the control of ladders, extension cords, ropes, and hoses, according to the following procedures:

- All ladders, extension cords, ropes, and hoses over three feet long will be stored in the designated location when not in use;
- Every staff member supervising the use of an extension ladder and/or heavy equipment will have at his/her disposal a portable two-way radio;
- Ladders will be inventoried and stored by size to facilitate inspection and handling;

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- Extension cords must be inventoried and have a metal or plastic tag attached, indicating issue number (by location) and length of cord;
- Extension cords longer than 10 feet will be classified and handled as class “R” tools; and
- In high-rise Centers, electrical cords attached to buffers, vacuum cleaners, etc., may not exceed two feet.

Scissors used for in-processing will be tethered securely to the fixture at which they are used.

Issuance of tools from a storage location for a specified project for extended periods requires approval of the security staff. The Work Detail Supervisor will conduct daily onsite checks of extended-use tools issued from the central tool room, and the Center Maintenance Supervisor will conduct such checks monthly at a minimum.

L. Lost Tools

The Center Administrator will develop and implement procedures governing lost tools, including verbal and written notification to supervisory officials, addressing residents with prior access to the tool(s) in question, and documentation and review.

When a restricted or non-restricted tool is missing or lost, staff will notify a supervisor immediately and the security staff in writing as soon as possible.

When the missing or lost tool is a class “R” tool, staff will inform the shift supervisor orally immediately upon discovering the loss. Any resident(s) who may have had access to the tool will be held at the work location pending completion of a thorough search.

When a medical unit tool or equipment item is missing or lost, staff immediately will inform the HSA, who will make the immediate verbal notification to the security staff or shift supervisor and written notification to the Center Administrator.

The Shift Supervisor’s office will maintain a lost-tool file, monitor the individual reports for accuracy, ascertain any unusual patterns or occurrences of loss in one or more shops, document search efforts, and send written notification to the security staff.

When a tool is recovered, staff will complete the lost or missing tool report and send copies to the security staff and Shift Supervisor.

The Center Administrator will implement quarterly evaluations of lost/missing tool files, reviewing the thoroughness of investigations, and efforts to recover tools. Documentation of the quarterly evaluations will be maintained on the right side of the tool inventory folder for the shop or area concerned.

M. Disposition of Excess Tools

The Center Administrator will establish written procedures to survey and destroy broken or worn out tools.

The tool control staff or security staff will implement procedures for storing broken and/or worn out tools in a secure area, pending survey and disposition.

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Excess tools not being surveyed will remain in a designated secure storage area until included in a subsequent survey or returned to use.

To maintain tool inventories at the most efficient operating level, staff in every shop and department will identify and move to a secure storage area all rarely used tools. Bin cards will account for the tools moved from shop to storage areas.

Either the tool control staff or security key control staff will be responsible for destroying all surveyed tools.

Security staff will maintain records of all tool surveys.

N. Private/Contract Repair and Maintenance Workers

Before entering or leaving the Center, all visitors, including repair and maintenance workers who are not ICE/Enforcement and Removal Operations or Center employees will submit to an inspection and inventory of all tools, tool boxes, and equipment that could be used as weapons.

Contractors will retain a copy of the tool inventory while inside the Center.

Staff will accompany non-employee workers in the Center to ensure that security and safety precautions and procedures are followed at all times, including removing tools at the end of each shift.

References

- ICE Family Residential Standard on Definitions
- ICE Family Residential Standard on Program Philosophy, Goals, and Expected Outcomes
- ICE Interim Firearms Policy (7/7/2004)
- Occupational Safety and Health Administration (OSHA)