



DETENTION STANDARD

DETAINEE CLASSIFICATION SYSTEM

I. POLICY

All facilities will develop and implement a system according to which INS detainees are classified. The classification system created through these standards will ensure that each detained alien is placed in the appropriate category and physically separated from detainees in other categories.

II. APPLICABILITY

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

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

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

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

III. STANDARDS AND SPC/CDF PROCEDURES

A. Standards

The facility shall develop and implement a system for classifying detainees in accordance with INS policy, rules, and guidelines as set forth in this Standard. CDFs and IGSA facilities may continue using the systems established locally, if the classification criteria are objective and all procedures meet INS requirements.

The classification system shall ensure:

1. All detainees are classified upon arrival, before being admitted into the general population. INS will provide CDFs and IGSA facilities with the data they need from each detainee’s file to complete the classification process.

All officers assigned to classification duties shall be trained in the facility’s classification process.

In SPCs/CDFs, every Detention Enforcement Officer (DEO) and contract security officer with detainee-intake/processing responsibilities will receive on-site training at the facility. The training will teach techniques for identifying and recording data the data from A-files and related records needed for classification purposes. The training will include procedures for preparing and filing classification forms.

2. If the detainee cannot be classified without certain information that is missing at the time of processing (e.g., results of criminal-record check), the detainee will be kept apart from the general population pending arrival of those data. Upon completion of the classification process possible, the detainee shall be housed in the general population.
3. The first-line supervisor will review and approve each detainee's classification.
4. Detainees shall be assigned housing, offered recreational activities, assigned work (at the detainee's request), and provided food service according to their classification levels.

Each facility shall establish a system that readily identifies a detainee's classification level, for example, color-coded uniforms.

B. Intake/Processing Officer Duties (Initial Classification)

The officer assigned to intake/processing will review the detainee's A-file, work-folder and/or information provided by INS, to identify and classify each new arrival according to the Detention Classification System (DCS). Pending receipt and processing of critical information (see paragraph III.A.2, above), the officer will segregate the detainee from the general population.

In SPCs/CDFs, upon completion of the classification process, staff will assign each detainee a color-coded uniform and wristband based on his/her classification level. The officer will place all original paperwork relating to the detainee's assessment and classification in his/her A-file (right side), with a copy placed in the detention file.

C. Classification Review

In all detention facilities, a supervisor will review the intake/processing officer's classification files for accuracy and completeness. Among other things, the reviewing officer shall ensure that each detainee has been assigned to the appropriate housing unit.

In addition, the reviewing officer will recommend changes in classification due to:

1. incidents while in custody;
2. a classification appeal by a detainee or recognized representative (see below); or
3. specific, articulable facts that surface after the detainee's in-processing.

D. Classification Information

Staff shall use the most reliable, objective information from the detainee's A-file or work-folder during the classification process. "Objective" information refers to facts, e.g., current offense, past offenses, escapes, institutional disciplinary history, violent episodes/incidents, etc. Opinion, even informed opinion (based on profiling, familiarity,

personal experience, etc.) is different from fact, and therefore irrelevant for detainee classification.

INS offices shall provide non-INS facilities with the necessary information for the facility to classify INS detainees. Because INS selectively releases material from the detainee's record to persons who are not INS employees (e.g., CDF or IGSA facility personnel), non-INS officers must rely on the judgment of the INS staff who select material from the files for facility use.

Examples of Acceptable Forms and Information

1. I-221 - Order to Show Cause (OSC/WA) and Notice of Hearing, with bond conditions (charging documents for aliens in deportation proceedings);
2. I-862 - Notice to Appear (charging document for aliens in removal proceedings);
3. I-110 and I-122 - Notice to Applicant for Admission, Detained for Hearing before Immigration Judge (charging documents for aliens in exclusion proceedings);
4. Form I-213 - Record of Deportable Alien;
5. All conviction documents relating to charges on Form I-221, I-862, I-110/122, or I 213 above;
6. Criminal History (Rap Sheet) - NCIC/CII/TII, etc.; and
7. Any other official record or observation that is verifiable and can be justified under review by official means.

Unacceptable sources of information include:

1. A written or oral account from an interested party, whether the detainee himself/herself, an NGO, an officer, other personnel involved in law enforcement/detention, or some other person, unless and until it has been officially confirmed;
2. Unconfirmed and unverified information provided by the new arrival; and
3. The unverified opinion of officers and other personnel;
4. Physical characteristics of the detainee, such as tattoos, descriptive clothing (gang attire), recent needle puncture marks, and digital amputations (used in Asian "Yakusa" gangs). These physical characteristics may be used to investigate further but may not be used in the completion of the DCS form unless verified.

E. Classification Levels and Housing Assignments

All facilities shall ensure that detainees are housed according to their classification level.

In SPCs/CDFs, the point total from the DCS form will decide the classification level of each detainee. All housing, work assignments, and available activities will be decided by the level of classification received by a detainee.

All classification levels are decided by the general makeup of the total population of the facility. Under no circumstances will issues of facility management or other factors external to the detainee classification system influence a detainee's classification level. All

classification levels are decided by the general makeup of the total population of the facility.

New arrivals are generally classified by convictions when assessing the criminal record reports. Use of convictions for classification will be limited, as suggested by the following general guidelines.

1. Level 1 Classification

- a. May not be housed with Level 3 Detainees.
- b. May not include any detainee with a felony conviction that included an act of physical violence.
- c. May not include any detainee with an aggravated felony conviction.
- d. May include detainees with minor criminal records and nonviolent felonies.

2. Level 2 Classification

- a. May not include any detainee whose most recent conviction was for any offense listed under the “HIGHEST” section of the severity of offense guideline (APPENDIX 1).
- b. May not include any detainee with a pattern or history of violent assaults, whether convicted or not. A pattern is considered established for purposes of this guideline when an arrest record reveals two or more arrests in a five year period for assault where force was used against another person with the intent to commit bodily injury.
- c. May not include any detainee convicted for assault on a correctional officer while in custody or where a previous institutional record suggests a pattern of assaults while in custody.

3. Level 3 Classification

- a. May include those detainees reclassified from level one and level two due to institutional incidents or changes in classification information.
- b. May be reclassified to Level two only based on institutional behavior, provided number 2.a. through 2.d. above do not apply (detainee must be in custody for a minimum of 60 days before reclassification).

Level three detainees are considered a high risk category requiring medium to maximum security housing. Level three detainees are always monitored and escorted.

F. Housing Assignments

The classification system shall assign detainees to the least restrictive housing unit consistent with facility safety and security. By grouping detainees with comparable records together, and isolating those at one classification level from all others, the system reduces noncriminal and nonviolent detainees’ exposure to physical and psychological danger. This system identifies and isolates the detainees whose histories indicate the characteristics of the hardened criminal, the category most likely to intimidate, threaten, or prey on the vulnerable.

Detainees shall be housed according to the above scale. Facilities that continue to be at 100 percent or above rated bed capacity will assign housing to detainees based on space availability. Level three detainees will not be housed with level one detainees. Levels one and two may be mixed, and high level twos and level threes may be mixed, when a facility is at or above full capacity. Under no circumstance will a level two detainee with a history of assaultive or combative behavior be placed in a level one housing unit. In facilities that have single cell living arrangements, detainees that pose an immediate and serious threat of violence to staff or other detainees shall be housed there.

G. Reclassification

All facility classification systems shall ensure that a detainee may be reclassified any time and the classification level redetermined.

In SPCs/CDFs, the first reassessment is completed 45 to 60 days after the date of the primary assessment. Subsequent reassessments are completed at 60 to 90 day intervals. A special reassessment is completed within 24 hours before detainee leaves disciplinary segregation. Reclassification shall also be conducted when new information or the addition of points due to institutional incidents while in custody. The officer assigned to classification will respond to requests for reclassification within 72 hours. Any reclassification shall require the approval of the office of the CDEO or INS or contract equivalent, prior to carrying out.

Any detainee may be reclassified to level three if the behavior and threat to the facility, other detainees, and personnel are articulable. Any reclassification to Level 3 that is not validated by the DCS Primary Assessment Form must receive approval by the CDEO within 72 hours.

All detainees placed in disciplinary segregation due to violation of facility rules will be reclassified and assigned housing accordingly, prior being returned to the general population.

Detainees classified at level two who exhibit acceptable institutional behavior may be reviewed and reclassified to level one, provided that items 1 through 4, above do not apply (detainee must be in custody for a minimum of 60 days before reclassification).

Level 2 detainees may be reclassified to Level 1 based on institutional behavior. (Detainee must be in custody for a minimum of 60 days before reclassification.)

H. Classification Appeal

All facility classification systems shall include procedures by which new arrivals can appeal their classification levels.

In SPCs/CDFs, all new arrivals classified as level two or three may appeal, as they will be informed during orientation, orally and in writing. All such appeals will be directed to, investigated, and reconsidered by the reviewing officer, who will forward a recommendation to the Chief Detention Enforcement Officer (CDEO) or contract equivalent.

The CDEO has the authority to reduce a classification level on appeal.

Appeals will be resolved within five business days, with notification of the outcome due to the detainee within 10 business days. The notification will include the date and time of review, reason(s) for deciding to grant or deny the appeal, and note the detainee's right to appeal the CDEO's decision to the OIC. The OIC will notify the detainee of his/her decision within 10 business days. The OIC's decision is not appealable.

I. Notice to Detainees

The detainee handbook's section on classification will include the following:

1. An explanation of the classification levels, with the conditions and restrictions applicable to each.
2. The procedures by which a detainee may appeal his/her classification.

IV. AMERICAN CORRECTIONAL ASSOCIATION STANDARDS REFERENCED

American Correctional Association 3rd Edition Standards for Adult Local Detention Facilities: 3-ALDF-4B-01, 4B-02

Approval of Standard



Michael D. Cronin
Acting Executive Associate Commissioner
Office of Programs

SEP 20 2000

Date



Michael A. Pearson
Executive Associate Commissioner
Office of Field Operations

SEP 20 2000

Date

DETAINEE CLASSIFICATION SYSTEM

INTRODUCTION AND USER MANUAL

This manual is intended for use in all INS Service Processing Centers (SPCs) and INS Contract Detention Facilities (CDFs) provided research data and other material used in developing this classification system.

The classification system presented in this document represents a 30-month research project performed by the National Institute of Corrections (NIC) and various jails throughout the United States. This project entailed a comprehensive review of jail-classification literature and a national survey of jail classification practices, both of which played a role in the design of the classification system presented herein.

The classification system presented in this document is representative of what has been called “the new generation of classification systems.” These are approaches that strive to base classification decision-making on objective measures of behavior; hence the term “*objective classification system*.” Unlike previous approaches to detainee classification, objective classification relies on a narrow set of well-defined legal characteristics (e.g. severity of most recent charge or conviction, prior convictions, and prior incarcerations) to guide decision making. These characteristics are incorporated into a standardized form or checklist used by staff to assess each detainee’s custody needs. Emphasizing fairness and explicitness in decision-making, objective classification is characterized by the following elements:

- Use of classification instruments that have been validated for detainee populations
- Use of the same classification approach for all detainees
- Promotion of similar decision-making among classification staff on comparable issues
- Assignment of detainees to custody levels consistent with their background

During the past decade, objective classification systems have been developed for and carried out by correctional institutions throughout the nation. Those facilities have found appropriate classification to be a cornerstone of effective detainee management. Jails, SPCs, and CDFs, however, have lagged behind prisons in the use of objective classification. This delay is a result of many factors unique to jail operations. Among the most salient of these are the diversity of persons confined in jails, the high volume of admissions to jails, and the rapid turnover of the jail population. Since these characteristics closely relate to the INS detained population, INS is focusing on the classification system developed by NIC.

The objective classification system developed for NIC was designed to address these special concerns. Additionally, it was constructed to fit a variety of jail settings so that the system could be tailored to work in jails of all sizes.

Finally, the system was implemented by NIC and field tested for eight months at jails in three sites: Hillsborough County, Florida; Johnson County, Kansas; and Marion County, Oregon.

The objective classification system for INS has three components:

- Detainee Classification System - Primary Assessment Form
- Detainee Classification System - Reassessment Form
- PHS J-794 Medical Screening Form

The INS objective classification system uses three instead of five components as suggested by NIC. In the INS version of objective classification, the “Initial Inmate Needs Assessment Form” and “Inmate Needs Reassessment Forms” are not used. This is due to the fact INS does not provide special services such as education, vocation, or substance abuse programs. Aliens in INS custody in need of special treatment will be referred to an appropriate facility as identified and necessary for treatment and care of special needs detainees. The primary purposes for detention of aliens are to guarantee their presence in an administrative court proceeding to determine their right to remain in or be removed from the United States and to ensure their removal from the U.S. when removal is ordered. INS has no current obligation to provide rehabilitative, educational or vocational programs.

This assessment system is designed to function as a detainee management tool for Officers in Charge, detention management staff and Detention Enforcement Officers. The objective jail classification system described in the following pages is intended to enhance Facility operations and environment, making conditions safer for all who work or live there.

UNITED STATES IMMIGRATION AND NATURALIZATION SERVICE DETAINEE CLASSIFICATION SYSTEM

Primary Assessment Form Instructions

The Primary Assessment Scale is used during initial classification to establish each detainee's recommended custody rating. This custody rating is based upon the classification officer's assessment of seven items, each of which is to be assigned a numerical score. These items have been found to be associated with future conduct, and thus help identify the types of risk likely to be presented by the detainee. The custody rating recommendation derived from these items is used, in combination with other specified information, when making decisions relating to the detainee's housing assignment and supervision requirements. The custody rating recommendation may be altered due to management considerations that warrant special attention or interview by staff.

COMPLETION POLICY:

The Primary Assessment Scale is to be used on all detainees remaining in confinement after completion of the detainee medical screening form (PHS Form J-794). The assessment is completed before a detainee is removed from the facility's processing area and given a housing assignment. Detainees will be processed for housing assignments in a timely manner.

Biographical Data Section:

- Detainee Name:** Enter detainee's full name, last name followed by first name and middle initial or addition surname.
- Detainee ID#:** Enter detainee's A-number. This should be the same number entered on the INS charging document, I-385, or A-file.
- Date of Birth (DOB):** Enter detainee's date of birth.
- Country of Citizenship:** Enter detainee's country of citizenship or nationality.
- Classified By:** Enter name of classification officer, last name followed by first name and middle initial.
- Identification Number** Enter ID number of classification officer. (Also known as Star #, a badge number may be substituted).
- Date:** Date of assessment and classification, using numbers to represent day, month, and year.
- District/SPC:** Enter 3-letter code of district and 3-letter code of facility where detainee is in custody.
- Language:** Circle either "Y" or "N" to indicate whether the detainee is an English speaker.
- Other:** Identify any other language spoken by the detainee that is known at time of assessment.

SECTION I INITIAL SECURITY ASSESSMENT:

Items A through C are intended to identify the detainee who presents a serious risk to the safety, security, and orderly operation of the facility. Detainees who score seven or above on the first three items are assigned to level 3 without consideration of the scores for the remaining items.

A. Severity of Most Recent Charge/Conviction

Determine the most recent charge or conviction for each detainee, using the Severity of Offense Scale. If detainee was last booked and returned to custody for a parole or probation violation, the severity of the current charge/conviction will be based on offense(s) for which parole or probation was granted. Enter the number of points associated with severity category into which detainee's most serious offense falls.

B. Serious Offense History

Exclude current or most recent offense(s). Determine most serious prior conviction and rank it on Severity of Offense Scale. Enter number of points associated with severity category into which detainees most serious conviction falls. If detainee has no record of prior convictions, enter 0.

C. Escape History

Consider any escapes or attempted escapes. Do not consider any escapes or attempts scored in item A. Enter number of points corresponding to detainee's most serious escape attempt. Escapes from correctional settings or programs are to be recognized if the detainee was found guilty of the escape or attempt by an institutional disciplinary committee, regardless of court prosecution and conviction status.

MAXIMUM CUSTODY SCORE:

Add points for items A-C, and enter total in box designated "MAXIMUM CUSTODY SCORE". If this score is 7 or higher, assign the detainee to Level 3 custody. Complete items D-G. Scores for items D-G do not need to be totaled unless maximum custody score is 6 or lower.

Items D-G are designed to establish a custody score for the detainee who is not immediately identified as a Level 3 maximum custody risk on the first three items.

D. Immigration Violations History

Consider detainee's entire immigration history including current admission. If detainee has no record of entry without inspection or is charged only with entry without inspection (misd), enter 0.

E. Prior Felony Convictions

Excluding current offense, consider detainee's entire history of convictions. Enter number of points associated with number of felony convictions.

F. Disciplinary Convictions/Institutional History

Enter the number of disciplinary convictions received during previous institution history.

G. History/Pattern of Assaults

Using available information from conviction history documents (NCIC, state records, etc.), assess and assign most recent score applicable. Assaultive history will include most recent charge whether convicted or not

COMPREHENSIVE CUSTODY SCORE:

Enter total score of items A-G in box if MAXIMUM CUSTODY SCORE is 6 or lower.

SECTION II: SCALE SUMMARY AND RECOMMENDATIONS

A. Custody Level

Enter custody level.

B. Special Management Concerns

This section is designed to address management issues that warrant attention and possible intervention by staff in the form of special housing and/or supervision. The following special management considerations are to be checked on the form if they exist (check all that apply):

1. Protective Custody

Detainee requires protective custody to ensure his/ her safety and well-being; detainee may, for example, be a witness, known informant, homosexual, have known enemies in the facility, or have a thin/frail appearance (victim potential), an unresolvable language barrier, or charge(s) for heinous/notorious crime(s).

2. Psychological Impairment

Detainee has been examined by mental health staff and found to be incapable of functioning in any housing area other than a highly structured treatment environment because he or she constitutes a danger to self and/or others.

3. Mental Deficiency

Detainee has been examined by mental health staff and found to have difficulty interacting with others due to limited comprehension and communication skills.

4. Escape Threat

Detainee has made significant threats to escape or has a documented history of escape(s) and/or attempted escape(s).

5. Serious Violence Threat

Detainee has a documented history of violent conduct, such as murder, rape, assault, intimidation involving a weapon, and arson.

6. Known Gang Affiliation

Detainee is known to be a member of a racial, political, terroristic, or religious group that uses violence to achieve its goals within a correctional setting and/or in the community and this affiliation is considered to be a management issue in the facility.

7. Substance Abuse Problem

Detainee was found to show characteristic signs of withdrawal or was under the influence of alcohol and/or drugs at the time of admission, has a reported history of substance abuse, or a criminal history of substance abuse, or has a criminal history indicating a substance abuse problem.

8. Known Management Problem

Detainee has a documented history of management problems while confined and/or disruptive behavior while in the community. Detainee is known to have incited provoked, and/or agitated peers; disrupted facility operations; and/or to have demonstrated a substantial lack of cooperation with authority figures.

9. Suspected Drug Trafficker

Detainee has repeatedly been charged and/or convicted of offenses related to sale and/or manufacture of illegal drugs; has been found guilty of introducing illicit drugs into a correctional setting; or has substantial financial resources that may be used to bribe staff, other detainees, or visitors in order to facilitate drug trafficking.

10. Suicide Risk

Detainee has been examined by mental health staff and is considered to be at risk for attempting to take his or her own life.

11. Medical Problem

Detainee has a medical problem that may require special housing or supervision.

12. Physical Impairment

Detainee has physical impairment that may require special housing or supervision.

13. Terrorist Threats/Terrorist

Any detainee documented as being a part of a terrorist group, suspected of making terrorist threats, or convicted of defined terroristic activity or crimes will be housed in a Maximum security area and classified Level three regardless of custody scale evaluation scores. Detainees identified in this category will remain in a lock-down status in an approved and recognized Administrative Segregation Unit.

14. Other

Describe other management considerations that may involve special housing and/or supervision requirements

C. Override Recommendation:

If the classification officer believes there are factors that warrant a custody classification which is different from that which is indicated, by the scale (II.A. above), enter “1” for yes and provide rationale. Otherwise, enter “2” (No). Overrides may be recommended to higher or lower custody levels, depending on the circumstances.

D. Recommended Custody Level

After reviewing the scale score and all other information which may justify an override, enter code indicating recommended custody level. This will be the same code as II.A. above, if no override is recommended.

* This section must be signed and dated by the classification officer.

SECTION III. SUPERVISOR APPROVAL OF OVERRIDE:

Supervisor approval is required if the classification officer recommends a scale override.

A. Recommended Custody Level

If the classification officer recommends an override of the custody level indicated by the Initial Custody Assessment Scale, enter code for approval or disapproval of the recommended custody level. If the custody level is disapproved, supervisor must complete III.B. below.

B. Final Custody Level

Enter the custody level approved by the supervisor. Written rationale must be provided if this level is different from that recommended in II.D. above.

* Section III must be signed and dated by the supervisor if an override has been recommended.

SECTION IV. HOUSING ASSIGNMENT

Recommended Housing Assignment:

Enter the final classification level and housing assignment level.

* Supervisor must sign approval of Section III. above and final housing assignment

**UNITED STATES IMMIGRATION AND NATURALIZATION SERVICE
DETAINEE CLASSIFICATION SYSTEM**

Classification Reassessment Form Instructions

The Classification Reassessment Scale is used to update and review an detainee's initial custody assessment. The reassessment scale is completed each 60 to 90 days and when new information affecting the detainee's management is received. Custody reassessment does not necessarily result in a change of custody rating or housing assignment. Its primary function is to monitor the detainee's adjustment and bring attention to problems that may arise.

Custody reassessment is similar to initial custody assessment, but places greater emphasis on institutional conduct to reflect the detainee's actual behavior while confined. It is important that detainee's with long lengths of stay have the opportunity for reduced custody levels based on compliance with institutional requirements.

COMPLETION POLICY

The first reassessment is completed 45 to 60 days after the date of the primary assessment. Subsequent reassessments are completed at 60 to 90 day intervals. A special reassessment is completed within 24 hours before a detainee leaves disciplinary segregation.

Biographical Data Section

- Detainee Name:** Enter detainee's full name, last name followed by first name and middle initial or addition surname.
- Detainee ID Number:** Enter detainee's "A" number. This should be the same number entered on the INS charging document, I-385, or "A" file.
- Date of Birth (D.O.B.):** Enter detainee's date of birth.
- Country of Citizenship:** Enter detainee's country of citizenship or nationality.
- Classified By:** Enter name of classification officer, last name followed by first name and middle initial.
- Ident. Number (ID #)** Enter ID number of classification officer. (Also known as Star #)(A badge number may be substituted)
- Date:** Date of reassessment and classification, using numbers to represent day, month, and year.
- District/SPC:** Enter 3 digit code of district and 3 digit code of SPC where detainee is in custody.
- Reassessment Reason:** Circle reason that best describes why reassessment is being done. "Routine" means it is being conducted per time frames specified by policy. "Disciplinary" is to be circled if reassessment results from an infraction. Use "other" code to indicate any special circumstances that require a reassessment.

SECTION I: INITIAL SECURITY ASSESSMENT:

Items A through C are intended to identify the detainee who presents a serious risk to the safety, security, and orderly operation of the facility. Detainees who score seven or above on the first three items are recommended for maximum custody without consideration of the scores for the remaining items.

A. Severity of Most Recent Charge/Conviction

Determine the most serious charge or conviction for detainee, using the Severity of Offense Scale. If detainee was last booked and returned to custody for a parole or probation violation, the severity of the current charge/conviction will be based on offense(s) for which parole or probation was granted. Enter number of points associated with severity category into which detainee's most serious offense falls.

B. Serious Offense History

Exclude current or most recent offense(s). Determine most serious prior conviction and rank it on Severity of Offense Scale. Enter number of points associated with severity category into which detainees most serious conviction falls. If detainee has no record of prior convictions, enter 0.

C. Escape History

Consider any escapes or attempted escapes including current admission. Do not consider any escapes or attempts scored in item A. Enter number of points corresponding to detainee's most serious escape attempt. Escapes from correctional settings or programs are to be recognized if the detainee was found guilty of the escape or attempt by an institutional disciplinary committee, regardless of court prosecution and conviction status.

MAXIMUM CUSTODY SCORE:

Add points for items A-C, and enter total in box designated "MAXIMUM CUSTODY SCORE". If this score is 7 or higher, assign the detainee to Level 3 custody. Complete items D-G. Scores for items D-G do not need to be totaled unless maximum custody score is 6 or lower.

Items D-G are designed to establish a custody score for the detainee who is not immediately identified as a Level 3 maximum custody risk on the first three items.

D. Number of Disciplinary Sanctions

Enter number of points associated with number of disciplinary sanctions since last reassessment date.

E. Most Serious Disciplinary Sanction

Determine most serious disciplinary conviction, using Disciplinary Severity Scale. Enter number of points associated with severity category for detainee's most serious sanction during this period of confinement.

F. Prior Felony Convictions

Excluding current offense consider detainee's entire history of convictions. Enter number of points associated with number of felony convictions.

COMPREHENSIVE CUSTODY SCORE: Enter total score of items A-F in box if MAXIMUM CUSTODY SCORE is 6 or lower.

SECTION II: SCALE SUMMARY AND RECOMMENDATIONS

A. CUSTODY LEVEL INDICATED BY SCALE

Using custody classification chart, enter code that indicated custody level designated by the scale.

B. SPECIAL MANAGEMENT CONCERNS

This section is designed to address management issues that warrant attention and possible intervention by staff in the form of special housing/or supervision. The following special management considerations are to be checked on the form if they exist (check all that apply):

Protective Custody

Detainee requires protective custody to ensure his or her safety and well-being; detainee may, for example, be a witness, known informant, or homosexual or have known enemies in the facility, a thin/frail appearance (victim potential), an unresolvable language barrier, or charge(s) for heinous/notorious crime(s).

Psychological Impairment

Detainee has been examined by mental health staff and found to be incapable of functioning in any housing area other than a highly structured treatment environment because he or she constitutes a danger to self and/or others.

Mental Deficiency

Detainee has been examined by mental health staff and found to have difficulty interacting with others due to limited comprehension and communication skills, apart from English language ability.

Escape Threat

Detainee has made significant threats to escape or has a documented history of escape(s) and/or attempted escape(s).

Serious Violence Threat

Detainee has a documented history of violent conduct, such as murder, rape, assault, intimidation involving a weapon, and arson. This conduct must have occurred while confined or while in the community.

Known Gang Affiliation

Detainee is known to be a member of a racial, political, terroristic, or religious group that uses violence to achieve its goals within a correctional setting and/or in the community and this affiliation is considered to be a management issue in the facility.

Substance Abuse Problem

Detainee was found to be showing signs of withdrawal or was under the influence of alcohol and/or drugs at the time of admission, has a reported history of substance abuse, or a criminal history of substance abuse, or has a criminal history indicating a substance abuse problem.

Known Management Problem

Detainee has a documented history of management problems while confined and/or disruptive behavior while in the community. Detainee is known to have incited, provoked, and/or agitated peers; disrupted facility operations; and/or to have demonstrated a substantial lack of cooperation with authority figures.

Suspected Drug Trafficker

Detainee has repeatedly been charged and/or convicted of offenses related to sale and/or manufacture of illegal drugs; has been found guilty of introducing illicit drugs into a correctional setting; or has substantial financial resources that may be used to bribe staff, other detainees, or visitors in order to facilitate drug trafficking.

Suicide Risk

Detainee has been examined by mental health staff and is considered to be at risk for attempting to take his or her own life.

Medical Problem

Detainee has a medical problem that may require special housing or supervision.

Physical Impairment

Detainee has physical impairment that may require special housing or supervision.

Terrorist Threats/Terrorist

Any detainee documented or reasonably suspected of making terrorist threats, or convicted of defined terrorist activity or crimes will be housed in a maximum security area and classified Level three regardless of custody scale evaluation scores. Detainees identified in this category will remain in a lock-down status in an approved and recognized Administrative Segregation Unit.

Other

Describe other management considerations that may involve special housing and/or supervision requirements

C. OVERRIDE RECOMMENDATION

If the classification officer believes there are factors that warrant a custody classification which is different from that which is indicated, by the scale (II.A. above), enter "1" for yes and provide rationale. Otherwise, enter "2" (No). Overrides may be recommended to higher or lower custody levels, depending on the circumstances.

D. RECOMMENDED CUSTODY LEVEL

After reviewing the scale score and all other information which may justify an override, enter code indicating recommended custody level. This will be the same code as II.A. above, if no override is recommended.

This section must be signed and dated by the classification officer.

SECTION III. SUPERVISOR APPROVAL OF OVERRIDE:

Supervisor approval is required if the classification officer recommends a scale override.

A. RECOMMENDED CUSTODY LEVEL

If the classification officer recommends an override of the custody level indicated by the Custody Reassessment Scale, enter code for approval or disapproval of the recommended custody level. If the custody level is disapproved, supervisor must complete III.B. below.

B. FINAL CUSTODY LEVEL

Enter the custody level approved by the supervisor. Written rationale must be provided if this level is different from that recommended in II.D. above. This section must be signed and dated by the supervisor if an override has been recommended.

SECTION IV. HOUSING ASSIGNMENT

RECOMMENDED HOUSING ASSIGNMENT: Enter the final classification level and housing assignment level.

* Supervisor must sign approval of Section III. above and final housing assignment.

U. S. IMMIGRATION & NATURALIZATION SERVICE
Detainee Classification System

SEVERITY OF OFFENSE SCALE

HIGHEST:

Aiding Escape
Aggravated Battery with Deadly Weapon
Armed Robbery (Multiple with injury)
Burglary with Assault
Escape (Secure Facility)
Inciting Riot
Kidnapping
Murder (1st, 2nd degree)
Sexual Battery (with violence upon a minor)

HIGH:

Aggravated Assault
Aggravated Battery
Aggravated Child Abuse
Arson
Battery Law Enforcement Officer
Burglary (Armed)
Extortion
False Imprisonment
False Report of Bombings
Controlled Substances (Importation, Trafficking)
Introduction of Contraband into Detention Facility
Manufacture of Explosives
Robbery (armed, strong armed)
Sexual Battery (other than capital or life felony)

MODERATE:

Armed Trespass
Burglary
Carrying Concealed Firearm
Forgery

Grand Theft
Manslaughter
Sale, Delivery, Possession of Controlled Substance
Tampering with Witness
Worthless Checks (felony)
Welfare Fraud (felony)
Escape (Non-secure Facility)

LOW:

Driving under the Influence
Leaving the scene of Accident
Battery (Simple Assault)
Carrying Concealed Weapon (other than firearm)
Disorderly Conduct
Gambling
Offering to Commit Prostitution
Possession Marijuana (misdemeanor)
Possession Drug Paraphernalia
Petit Theft
Trespass
Worthless Check (misdemeanor)

U. S. IMMIGRATION & NATURALIZATION SERVICE
Detainee Classification System

DISCIPLINARY SEVERITY SCALE

HIGHEST:

Assaulting any Person
Fighting with Another Person
Threatening another with Bodily Harm
Extortion, Blackmail, Protection, demanding or receiving money or anything of value in return for protection
Engaging in sexual acts with others
Making sexual propositions or threats to another
Escape
Attempting or Planning Escape
Setting a Fire
Adulteration of any food or drink
Possession or Introduction of any explosive or ammunition
Possession of Contraband
Rioting
Encouraging others to riot
Engaging in, or encouraging, a group demonstration
Giving or Offering any official or staff member a bribe or anything of value

HIGH:

Destroying, Altering, or Damaging government property or the property of another
Stealing
Misuse of authorized medication
Loaning of Property or anything of value for profit or increased return.
Possession of anything not authorized or authorized for retention
Encouraging others to refuse to work
Refusing to obey a staff order
Insolence toward a staff member
Lying or providing false statement to a staff member
Conduct that interrupts or disrupts the normal operation of the facility.
Counterfeiting, Forging, or Unauthorized Reproduction of any document, article, identification, money, security, or official paper.

Participating in unauthorized meeting or gathering

Failure to stand count

Interfering with taking of count

Making intoxicants or being intoxicated

Tattooing or Self-Mutilation

MODERATE:

Indecent Exposure

Mutilating or altering issued clothing

Refusing to work

Unexcused absence from work or any assignment

Failure to perform work as instructed by supervisor

Being in an unauthorized area

Using abusive or obscene language

Unauthorized use of mail or telephone

Unauthorized contacts with the public

Correspondence or conduct with a visitor in violation of posted regulations

LOW:

Wearing a disguise or mask

Failure to follow safety or sanitation guidelines

Using any equipment/machinery contrary to instructions or posted safety standards

Smoking where prohibited

Gambling, preparing or conducting a gambling pool, possession of gambling paraphernalia

Being unsanitary or untidy, failure to keep one's person and quarters in accordance with posted standards

U. S. IMMIGRATION & NATURALIZATION SERVICE
Detainee Classification System - Primary Assessment Form

NAME: _____ A# _____

D.O.B: ____ / ____ / ____ Country of Citizenship: _____

CLASSIFIED BY: _____ (ID #) _____ DATE: ____ / ____ / ____

DIST/SPC: _____ LANGUAGE: (ENGLISH Y/N) OTHER: _____

12. INITIAL SECURITY EVALUATION:

1. Severity of Most Recent Charge / Conviction: (Use severity of offense scale; rate most serious charge / conviction) **SCORE: _____**
LOW..... 0 []
MODERATE..... 2 []
HIGH..... 5 []
HIGHEST..... 7 []
2. Serious Offense History: (Use severity of offense Scale; rate most serious prior conviction) **SCORE: _____**
NONE OR LOW..... 0 []
MODERATE..... 1 []
HIGH..... 4 []
HIGHEST..... 7 []
3. Escape History: (Excluding current charges). **SCORE: _____**
NONE (No escapes or attempts)..... 0 []
WALKAWAY OR ATTEMPTED ESCAPE from minimum security facility or failure to return from authorized absence..... 4 []
ESCAPE OR ATTEMPTED ESCAPE FROM SECURE FACILITY..... 7 []

MAXIMUM CUSTODY SCORE (Add items A, B, and C)..... TOTAL SCORE: _____

SCORE OF 7 OR HIGHER ASSIGN TO LEVEL 3 CUSTODY:

(Always complete remaining items, but do not total score if detainee has already been assigned to Level 3 custody)

4. Immigration Violations History: **SCORE: _____**
NONE or single entry without inspection (misd)..... 0 []
Re-Entry after deport or other Immigration charge (Felony) 2 []
3 or more previous immigration violations 4 []
5. Prior Convictions: (Excluding last conviction) **SCORE: _____**
NONE..... 0 []
One to four misdemeanors or One Felony..... 2 []
Five or more misdemeanors or Two or More Felonies..... 4 []
6. Number of Disciplinary Convictions: (Previous Institution) **SCORE: _____**
NONE..... 0 []
ONE..... 1 []
TWO..... 3 []
THREE..... 5 []
7. History / Pattern of Assaults **SCORE: _____**
Assault (Within one year)..... 4 []
Assault (Over 1 Year/Less than 10) 2 []
Assault (Over 10 Years) 0 []

COMPREHENSIVE CUSTODY SCORE (Items A-G).....TOTAL SCORE: _____

13. SCALE SUMMARY AND RECOMMENDATIONS:

1. CUSTODY LEVEL INDICTED BY SCALE..... CODE:_____
1 = Level 1 2 = Level 2 3 = Level 3

CUSTODY CLASSIFICATION

7 or more points on items A through C Section I..... LEVEL 3
4 or fewer points on items A through G Section I..... LEVEL 1
4 or fewer points on items A through G Section 1 w/ detainer or warrant..... LEVEL 2
5 to 10 points on items A through G Section I..... LEVEL 2
11 or more points on items A through G Section I..... LEVEL 3

2. CHECK [X] ALL THE SPECIAL MANAGEMENT CONCERNS WHICH APPLY TO THIS
DETAINEE:

- [] Protective Custody [] Known Management Problem
[] Psychological Impairment [] Suspected Drug/Alien Trafficker
[] Mental Deficiency [] Suicide Risk
[] Suicide Risk [] Medical Problem (PHS Form J-794)
[] Serious Violence Threat [] Physical Impairment (PHS Form J-794)
[] Known Gang Affiliation [] Other (Specify):
[] Substance Abuse Program [] Terrorist Threat/Terrorist (Auto. L-3)

3. OVERRIDE OF SCALE CUSTODY IS RECOMMENDED: [] YES [] NO

IF YES, GIVE RATIONALE (REQUIRED): _____

4. RECOMMENDED CUSTODY LEVEL:

[] LEVEL 1 [] LEVEL 2 [] LEVEL 3

Classification Officer Signature:_____ Date:____/____/____

14. SUPERVISORY APPROVAL OF OVERRIDE:

1. RECOMMENDED CUSTODY LEVEL: [] APPROVED [] DISAPPROVED

2. FINAL CUSTODY LEVEL (If override disapproved).....

[] LEVEL 1 [] LEVEL 2 [] LEVEL 3

Rationale (required if different from recommendation):_____

HOUSING ASSIGNMENT:

[] LEVEL 1 [] LEVEL 2 [] LEVEL 3 [] ADMIN. SEGREGATION (Memo req.)

SDEO SIGNATURE:_____ DATE:____/____/____

U. S. IMMIGRATION & NATURALIZATION SERVICE
Detainee Classification System - Secondary Assessment Form

NAME: _____ A# _____
DOB: ____ / ____ / ____ Country of Citizenship: _____
CLASSIFIED BY (Print): _____ (ID #) _____ DATE: ____ / ____ / ____

DIST/SPC: _____ LANGUAGE: (ENGLISH Y/N) OTHER: _____

15. INITIAL SECURITY EVALUATION:

1. Severity of Most Recent Charge / Conviction: (Use severity of offense scale; rate most serious charge / conviction) **SCORE: _____**
LOW..... 0 []
MODERATE..... 2 []
HIGH..... 5 []
HIGHEST..... 7 []
2. Serious Offense History: (Use severity of offense Scale; rate most serious prior conviction) **SCORE: _____**
NONE OR LOW..... 0 []
MODERATE..... 1 []
HIGH..... 4 []
HIGHEST..... 7 []
3. Escape History (Excluding current charges) **SCORE: _____**
NONE (No escapes or attempts)..... 0 []
WALKAWAY OR ATTEMPTED ESCAPE from minimum security facility or failure to return from authorized absence..... 4 []
ESCAPE OR ATTEMPTED ESCAPE FROM SECURE FACILITY..... 7 []

MAXIMUM CUSTODY SCORE (Add items A, B, and C)..... TOTAL SCORE: _____

SCORE OF 7 OR HIGHER ASSIGN TO LEVEL 3 CUSTODY:
(Always complete remaining items, but do not total score if detainee has already been assigned to Level 3 custody)

4. Number of Disciplinary Convictions: (Since last classification) **SCORE: _____**
NONE..... 0 []
ONE..... 2 []
TWO..... 4 []
THREE..... 6 []
5. Most Serious Disciplinary Charge Sustained: (Use disciplinary Severity of Offense Scale; rate during this period of confinement) **SCORE: _____**
NONE..... 0 []
LOW..... 1 []
MODERATE..... 2 []
HIGH..... 5 []
HIGHEST..... 7 []
6. Prior Felony Convictions: **SCORE: _____**
NONE..... 0 []
ONE..... 1 []
TWO OR MORE..... 2 []

COMPREHENSIVE CUSTODY SCORE (Items A-F)..... TOTAL SCORE: _____

16. SCALE SUMMARY AND RECOMMENDATIONS:

1. CUSTODY LEVEL INDICTED BY SCALE..... CODE:_____

1 = Level 1 2 = Level 2 3 = Level 3

CUSTODY CLASSIFICATION CHART

7 or more points on items A through C Section I.....	LEVEL 3
4 or fewer points on items A through G Section I.....	LEVEL 1
4 or fewer points on items A through G Section 1 w/ detainer or warrant...	LEVEL 2
5 to 10 points on items A through G Section I.....	LEVEL 2
11 or more points on items A through G Section I.....	LEVEL 3

2. CHECK [X] ALL THE SPECIAL MANAGEMENT CONCERNS WHICH APPLY TO THIS DETAINEE:

- | | |
|---|--|
| <input type="checkbox"/> Protective Custody | <input type="checkbox"/> Known Management Problem |
| <input type="checkbox"/> Psychological Impairment | <input type="checkbox"/> Suspected Drug Trafficker |
| <input type="checkbox"/> Mental Deficiency | <input type="checkbox"/> Suicide Risk |
| <input type="checkbox"/> Suicide Risk | <input type="checkbox"/> Medical Problem (PHS Form J-794) |
| <input type="checkbox"/> Serious Violence Threat | <input type="checkbox"/> Physical Impairment (PHS Form J-794) |
| <input type="checkbox"/> Known Gang Affiliation | <input type="checkbox"/> Other (Specify): |
| <input type="checkbox"/> Substance Abuse Program | <input type="checkbox"/> Terrorist Activity/Terrorist (Auto. L-3) |

3. OVERRIDE OF SCALE CUSTODY IS RECOMMENDED YES NO

IF YES, GIVE RATIONALE (REQUIRED): _____

4. RECOMMENDED CUSTODY LEVEL: LEVEL 1 LEVEL 2 LEVEL 3

Classification Officer Signature: _____ Date: ____ / ____ / ____

17. SUPERVISORY APPROVAL OF OVERRIDE:

1. RECOMMENDED CUSTODY LEVEL: APPROVED DISAPPROVED
(Complete B if disapproved)

2. FINAL CUSTODY LEVEL (If override disapproved)

LEVEL 1 LEVEL 2 LEVEL 3

Rationale (required if different from recommendation): _____

18. FINAL APPROVAL/HOUSING ASSIGNMENT:

HOUSING ASSIGNMENT:

LEVEL 1 LEVEL 2 LEVEL 3 ADMIN. SEGREGATION (Memo req.)

SDEO SIGNATURE: _____ DATE: ____ / ____ / ____

U. S. IMMIGRATION & NATURALIZATION SERVICE
Detainee Classification System - Secondary Assessment Form

NAME: _____ A# _____
DOB: ____/____/____ Country of Citizenship: _____
CLASSIFIED BY (Print): _____ (ID #) _____ DATE: ____/____/____

DIST/SPC: _____ LANGUAGE: (ENGLISH Y/N) OTHER: _____

15. INITIAL SECURITY EVALUATION:

1. Severity of Most Recent Charge / Conviction: (Use severity of offense scale; rate most serious charge / conviction) **SCORE: _____**
LOW..... 0 []
MODERATE..... 2 []
HIGH..... 5 []
HIGHEST..... 7 []
2. Serious Offense History: (Use severity of offense Scale; rate most serious prior conviction) **SCORE: _____**
NONE OR LOW..... 0 []
MODERATE..... 1 []
HIGH..... 4 []
HIGHEST..... 7 []
3. Escape History (Excluding current charges) **SCORE: _____**
NONE (No escapes or attempts)..... 0 []
WALKAWAY OR ATTEMPTED ESCAPE from minimum security facility or failure to return from authorized absence..... 4 []
ESCAPE OR ATTEMPTED ESCAPE FROM SECURE FACILITY..... 7 []

MAXIMUM CUSTODY SCORE (Add items A, B, and C)..... TOTAL SCORE: _____

SCORE OF 7 OR HIGHER ASSIGN TO LEVEL 3 CUSTODY:
(Always complete remaining items, but do not total score if detainee has already been assigned to Level 3 custody)

4. Number of Disciplinary Convictions: (Since last classification) **SCORE: _____**
NONE..... 0 []
ONE..... 2 []
TWO..... 4 []
THREE..... 6 []
5. Most Serious Disciplinary Charge Sustained: (Use disciplinary Severity of Offense Scale; rate during this period of confinement) **SCORE: _____**
NONE..... 0 []
LOW..... 1 []
MODERATE..... 2 []
HIGH..... 5 []
HIGHEST..... 7 []
6. Prior Felony Convictions: **SCORE: _____**
NONE..... 0 []
ONE..... 1 []
TWO OR MORE..... 2 []

COMPREHENSIVE CUSTODY SCORE (Items A-F)..... TOTAL SCORE: _____

16. SCALE SUMMARY AND RECOMMENDATIONS:

1. CUSTODY LEVEL INDICTED BY SCALE..... CODE:_____

1 = Level 1 2 = Level 2 3 = Level 3

CUSTODY CLASSIFICATION CHART

7 or more points on items A through C Section I.....	LEVEL 3
4 or fewer points on items A through G Section I.....	LEVEL 1
4 or fewer points on items A through G Section 1 w/ detainer or warrant...	LEVEL 2
5 to 10 points on items A through G Section I.....	LEVEL 2
11 or more points on items A through G Section I.....	LEVEL 3

2. CHECK [X] ALL THE SPECIAL MANAGEMENT CONCERNS WHICH APPLY TO THIS DETAINEE:

- | | |
|---|--|
| <input type="checkbox"/> Protective Custody | <input type="checkbox"/> Known Management Problem |
| <input type="checkbox"/> Psychological Impairment | <input type="checkbox"/> Suspected Drug Trafficker |
| <input type="checkbox"/> Mental Deficiency | <input type="checkbox"/> Suicide Risk |
| <input type="checkbox"/> Suicide Risk | <input type="checkbox"/> Medical Problem (PHS Form J-794) |
| <input type="checkbox"/> Serious Violence Threat | <input type="checkbox"/> Physical Impairment (PHS Form J-794) |
| <input type="checkbox"/> Known Gang Affiliation | <input type="checkbox"/> Other (Specify): |
| <input type="checkbox"/> Substance Abuse Program | <input type="checkbox"/> Terrorist Activity/Terrorist (Auto. L-3) |

3. **OVERWRITE OF SCALE CUSTODY IS RECOMMENDED** YES NO

IF YES, GIVE RATIONALE (REQUIRED): _____

4. RECOMMENDED CUSTODY LEVEL: LEVEL 1 LEVEL 2 LEVEL 3

Classification Officer Signature: _____ Date: ____ / ____ / ____

17. SUPERVISORY APPROVAL OF OVERRIDE:

1. RECOMMENDED CUSTODY LEVEL: APPROVED DISAPPROVED
(Complete B if disapproved)

2. FINAL CUSTODY LEVEL (If override disapproved)

LEVEL 1 LEVEL 2 LEVEL 3

Rationale (required if different from recommendation): _____

18. FINAL APPROVAL/HOUSING ASSIGNMENT:

HOUSING ASSIGNMENT:

LEVEL 1 LEVEL 2 LEVEL 3 ADMIN. SEGREGATION (Memo req.)

SDEO SIGNATURE: _____ **DATE:** ____ / ____ / ____

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

Policy: All facilities will develop and implement a system according to which INS detainees are classified. The classification system will ensure that each detainee is placed in the appropriate category, physically separated from detainees in other categories

CLASSIFICATION SYSTEM			
Components	Yes	No	Remarks
1. Does the facility have a system for classifying INS detainees?			
2. If so, does standard procedure include: a. Classifying detainees upon arrival? b. Separating individuals who cannot be classified upon arrival from the general population? c. The first-line supervisor reviewing every classification decision?			
3. Does the intake/processing officer review work-folder, A-file, etc., to identify and classify each new arrival?			
4. Does staff assign each detainee a color-coded uniform and wristband based on his/her classification level?			
5. Does every A-file include original paperwork supporting the classification? a. On the right side? b. Does the detention file contain a copy?			
6. On what source material do officers base classification decisions? 7. How are opinions and unsubstantiated/unconfirmed reports used?			
7. Are housing assignments based on classification-level? a. Are detainees assigned to the least restrictive housing unit? Are detainees of different classification levels housed together? b. If so, what are the selection criteria?			
8. Are the detainees fed according to their classification level?			

CLASSIFICATION SYSTEM

Components	Yes	No	Remarks
9. Does a detainee's classification-level affect his/her recreation opportunities? a. Does a detainee participate in recreation activities with detainees with different classification-levels?			
10. Does his/her classification-level determine a detainee's work assignment?			
11. Does the classification process include reassessment/reclassification? If yes: a. Do procedures include a reassessment between 45 and 60 days after arrival? b. Are subsequent reassessments completed every 60 to 90 days?			
12. Does the classification system include standard procedures for processing new arrivals' appeals? a. Who has the authority to reduce a classification-level on appeal? b. Are appeals resolved within five business days? c. Is the detainee notified of the outcome within 10 business days? d. Is the decision appealable? If so, to whom?			
13. Does the Detainee Handbook explain the classification levels, with the conditions and restrictions applicable to each?			
14. Does the Detainee Handbook specify the procedures a detainee must follow to appeal his/her classification or request reclassification?			

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

CLASSIFICATION SYSTEM

Verification Sources:

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

SOURCE	TIME	DATE	LOCATION
A. Observing In-processing			
B. Review of M-482			
C. Inspecting detainee housing units/recreation/work assignments			
D. Review of Detention Files			
E. Review of written policy and procedures			
F. Detainee and staff interviews *			

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

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

Auditor's Signature

Date