



## DETENTION STANDARD

### TOOL CONTROL

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#### **I. POLICY**

Every facility will establish a tool-control policy with which all employees shall comply. The Maintenance Supervisor shall maintain a computer-generated or typewritten inventory of tools and equipment, and storage locations. These inventories shall be current, filed, and readily available during an audit.

#### **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. Reasons for Tool Control**

1. Impedes use of tools in escape attempts, weapons manufacture, or situations hazardous to facility or individual safety;
2. Improves appearance of general-shop and construction areas;
3. Ensures tools in good repair for the job at hand;
4. Reduces overall tool cost through maintenance and inventory management.
5. Teaches detainee workers principles of (tool) accountability and responsibility.

##### **B. Tool Inventory Responsibilities**

The Officer in Charge (OIC) shall designate the person responsible for developing and implementing tool-control procedures, along with an inspection system to ensure

accountability. The OIC shall, in writing, assign a member of the Maintenance Department the collateral duties of Tool Control Officer.

The following departments shall maintain tool inventories:

1. Maintenance Department
2. Medical Department
3. Food Service Department
4. Electronics Shop
5. Recreation Department
6. Armory

In SPCs/CDFs, the OIC shall designate either the Chief Detention Enforcement Officer (CDEO) or the Chief of Security with responsibility for developing and implementing written tool-control procedures and supporting inspection/compliance procedures. The OIC shall approve these procedures before implementation.

Each department head is responsible for implementing tool-control procedures in his/her department. However, the following procedures apply to the Maintenance Department Head, Health Services Administrator (HSA), Food Service Manager, Electronics Technician, Recreation Specialist, and Senior Firearms Instructor:

1. Prepare a computer-generated inventory of all class “R” tools in, respectively, the maintenance restricted-tool room, the medical facility, the food service department, the electronics work area, recreation areas, and armory.
2. Post a copy of the class “R” tool inventory with the equipment, in a prominent position.
3. Submit a second copy of the inventory to the CDEO.
4. Retain a third copy in the department.
5. Repeat the class “R” tool inventory on a regular schedule (at least weekly, monthly, or quarterly), as follows:
  - Food service department-weekly
  - Maintenance department, medical facility-monthly
  - Electronics work area, recreation area(s), armory-quarterly.
6. Send a copy of the inventory report to the OIC.
7. Report missing tools in accordance with procedures (see section III.H., below).

**C. Tool Classification**

The facility shall develop and implement a tool classification system.

In SPCs/CDFs, tools belong in one of two categories: dangerous/hazardous tools fall into the restricted category (class “R”); non-hazardous tools fall into the non-restricted category.

The “restricted” category includes the following: tools too dangerous for detainees to handle without constant staff supervision; tools to which detainee access is prohibited;

tools that could facilitate an escape/escape attempt; tools useful in making weapons; tools that could double as weapons; tools capable of causing serious bodily harm; and, generally, tools hazardous to facility security or personal safety. Class “R” also includes power hand tools, with or without cords.

Examples of restricted tools include:

- Metal cutting blades
- Mixing chambers
- Bolt cutters
- Ramset gun and ammunition (stored in armory only)
- Diamond-tipped tools
- Core drills
- Drills
- Circular saws

Staff shall remove restricted tools from work areas at the end of each workday for safekeeping in a secure tool room, in the armory, or in the Control Center.

Staff shall restrict the supply of acetylene entering the facility to the amount needed in a single day. At the end of each workday, staff shall 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 industrial safety regulations, etc.).

The OIC shall establish a policy document on facility tool use and storage. The document shall include separate, comprehensive, alphabetical lists of restricted tools and non-restricted tools. The lists shall indicate which of the listed tools are available on-site; describe them by type; and specify tool sizes.

The OIC shall keep the lists current by formatting them as attachments to the policy document, maintained and updated on a personal computer. The tool lists will be updated and distributed at least quarterly.

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

Drill bits, metal/wood	1/32” - _”
Drill bits, metal/wood	7/16” - 7/8”
Wrench, comb. box/open end	1/4” - 7/16”
Wrench, comb. box/open end	7/16” - 7/8”

However, in another example, the facility has a single “wrench, combination box/open end, 1 7/8 inches” but not the smaller or larger sizes; or has several wrenches in different sizes, but the size differences are not standard. In this case, each wrench requires a separate listing.

**D. Tool Identification**

The OIC will establish written procedures for marking tools, making them readily identifiable.

In SPCs/CDFs:

1. The Tool Control Officer shall mark every tool in every work location with a symbol signifying its storage location e.g., armory, Control Center. Some tools will require “AMIS” bar-coding.
2. Exceptions to the universal marking rule include surgical instruments, micrometers, small drill bits, and other tools too small, fragile, or otherwise susceptible to damage. All tools unmarkable tools will be inventoried and kept in locked storage when not in use.

**E. Storage in Work Areas**

The OIC will establish written procedures for storing tools. The tool-storage system will ensure accountability. Commonly used, mounted tools shall be stored so that a tool’s disappearance would not escape attention.

In SPCs/CDFs:

1. 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. The color code specifies white backgrounds for all shadow boards; red shadows for restricted tools; black for non-restricted tools.
2. Tools not adaptable to shadow boards shall be kept in a locked drawer or cabinet. Staff shall process, without opening, hospital “sterile packs.” Staff will not open sterile packs for inventory or any other non-medical reason, except when tampering or theft is suspected. In that case, staff shall contact the health services department before opening a pack from which instruments may have been removed. To prevent such incidents, sterile packs shall be stored under lock and key at all times.
3. All restricted tools shall be secured in a central tool room, isolated from the housing units. Shadow boards accessible to detainees shall have expanded-metal covers, and shall be locked when not in use.
4. When a tool is removed from the inventory, its shadow will likewise be removed from the shadow board.
5. Work-detail supervisors will account for all tools at the end of every work period.
6. If maintenance workers are assigned personal shadow boards, the boards must be encased in expanded metal.
7. Individual toolboxes containing tools used on a daily basis must be secured with hasp and padlock. The individual responsible for the toolbox shall keep an inventory sheet in the toolbox. The Tool Control Officer will maintain copies of all such inventory sheets.
8. Infrequently used tools may be stored in individual tool cages with shadow boards, secured by hasp and padlock. However, 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 responsible staff member will maintain an inventory sheet in the tool cage, with a copy to the Tool Control Officer.

**F. Tool Inventories**

The OIC will schedule, and establish procedures for, the regular inventorying of all tools. Facilities shall use AMIS bar code labels as necessary.

In SPCs/CDFs:

1. The warehouse will receive all tool deliveries if located outside the facility's secure perimeter. If the warehouse is located within the secure perimeter, the OIC will develop site-specific procedures, e.g., storing the tools at the rear sally port until picked up and receipted by the Tool Control Officer. The Tool Control Officer will immediately place certain tools (e.g., bandsaw blades, files, and all restricted tools) in secure storage.
2. The new tools shall be issued only after the Tool Control Officer has marked and inventoried them.
3. Inventories that include any portable power tools will provide brand name, model, size, description, and AMIS number.
4. The inventory schedule for tools in current use (annual, quarterly, daily) will be as follows:
  - a. Annual: The Tool Control Officer and employees responsible for tools will together inventory all tools/equipment on-site at least once every year. Each inventory-taker shall certify the accuracy of that inventory, which must be approved by the Maintenance Supervisor and CDEO. The Tool Control Officer will provide the CDEO a complete set of the separate inventories (e.g., restricted tools, non-restricted tools), referred to as the master inventory sheet.
  - b. Quarterly: Every three months the employees responsible for tools will conduct verification inventories, both to ensure the accuracy and completeness of current inventory listings and to check the condition of shadows and markings. The employee(s) responsible will complete the inventory/ies and initial the appropriate column on the Master Tool Inventory Sheet in the CDEO's office.
  - c. The CDEO will assign an officer to monitor the quarterly inventories. This officer shall initial the bottom of each form certifying the records have been checked and all inventories completed, as evidenced by the employees' initials.
  - d. The work detail supervisor or staff member assigned a toolbox will be accountable for the integrity of his/her assigned tools on a daily basis.
5. Inventory-maintenance at each work location is the responsibility of the detail supervisor and department head.
6. Any tool being permanently removed from service will be turned in to the Tool Control Officer for recordkeeping and safe disposal.
7. Tools purchased or acquired from surplus property will be stored in the designated, secure storage area. The responsible employee will maintain a perpetual inventory of

unmarked or excess tools returned to secure storage for issue or reissue. The Tool Control Officer has sole authority to draw tools from this source. Any such tools kept in the Tool Control Officer's storage area will be registered in a perpetual inventory.

8. 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 inventory in the CDEO's office requires the certifiers' signatures.
9. The CDEO will maintain a separate file folder for each shop or area in which 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 completely retyped or reprinted and inserted into the master inventory. Staff shall not destroy any of the original pages, which will be moved from the left to the right side of the folder for future reference.

The right side of the folder will also contain, but is not limited to, the following: lost or missing tool reports, requests for inventory additions or deletions, survey requests and reports, storeroom requisition forms, and any other document directly related to site-specific tool-control procedures.

When the annual inventory is completed (January preferred), staff shall place the form on the left side of the folder, moving the previous year's to the right side. Each folder shall contain the materials for the current year plus the preceding two years. A divider will separate the annual records.

10. Staff shall prepare an inventory of all tools and equipment used by contractors working inside the facility. The CDEO will establish control procedures, particularly for restricted tools. The CDEO, Maintenance Supervisor and construction foreman will maintain copies of all such inventories and control procedures.
11. Although not classified as tools, weapons, chemical agents, restraints, and other disturbance-control equipment; binoculars; communication equipment, and other such items require strict property-management controls. Therefore, all such equipment shall be inventoried (with serial numbers), maintained, issued, and disposed of in accordance with the procedures established for tools.

#### **G. Issuing Tools**

Each facility shall have procedures in place for the issuance of tools to staff and detainees. The procedures shall address the security issues of restricted and unrestricted tools as well as procedures for the control of ladders, extension cords, and ropes.

In SPCs/CDFs:

1. The CDEO shall issue a restricted tool only to the individual who will be using it. Supervisors shall exercise continuous visual oversight of employees using restricted tools.
2. Detainees may use non-restricted tools under intermittent supervision. However, the detail supervisor shall account for all such tools at the end of every work period.
3. A metal or plastic chit receipt will be taken for all tools issued. When a tool is issued from a shadow board, a receipt will be visible on the shadow board.

4. The OIC shall establish site-specific procedures for the control of ladders, extension cords, and ropes. Ladders will be inventoried and stored by size to facilitate inspection and handling. 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 are classified and handled as Class R tools. All ladders, extension cords, and ropes will be stored in the designated location when not in use.

Every staff member supervising the use of extension ladder and/or heavy equipment shall have at his/her disposal a portable two-way radio.

In high-rise SPCs and CDFs, electrical cords attached to buffers, vacuums, etc., will not exceed two feet.

5. The CDEO shall approve the issuance of tools from a storage location to a specified project for extended periods.

The Maintenance Supervisor shall conduct on-site checks of extended-use tools issued from the central tool room at least once a month; the detail officer shall conduct such inspections daily.

## **H. Lost Tools**

The OIC shall develop and implement procedures governing lost tools, including:

1. Verbal and written notification to supervisory officials;
2. Handling detainees with prior access to the tool(s) in question;
3. Documentation and review.

In SPCs/CDFs:

1. When a restricted or non-restricted tool is lost, staff shall send written notification to the CDEO. Staff shall orally inform the shift supervisor immediately upon discovering the loss of a restricted tool. The shift supervisor's office will maintain a lost-tool file, monitoring the individual reports for accuracy, noting unusual patterns/occurrences of loss in one or more shops, search efforts mounted, etc.

Staff shall immediately report missing and/or lost tools in the medical facility to the HAS, as provided in the Health Services Policy Manual, section 16.4. The HSA shall make the verbal notification to the CDEO or shift supervisor and the written notification to the OIC

2. Any detainee(s) who may have had access to the tool will be held at the work location pending completion of a thorough search.
3. On the day the tool is recovered, staff shall complete and send copies of the Lost or Missing Tool Report to the CDEO and shift supervisor.
4. The OIC 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 master-inventory folder for the shop or area concerned.

**I. Disposition of Excess Tools**

All broken or worn-out tools will be surveyed and destroyed in accordance with the written procedures established by the OIC.

In SPCs/CDFs:

1. The Tool Control Officer or Security Officer will implement procedures for storing broken and/or worn-out tools in a secure area, pending survey and disposition.
2. Excess tools not being surveyed shall remain in a designated, secure storage area until included in a subsequent survey, or returned to use.
3. To maintain tool inventories at the most efficient operating level, staff in every shop/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 area.
4. Either the Tool Control Officer or Security Officer shall be responsible for destroying all surveyed tools.
5. The CDEO's office will maintain records of all tool surveys.

**J. Private/Contract Repair and Maintenance Workers**

All visitors, including repair and maintenance workers who are not INS or facility employees, members of sports teams, etc., shall submit to an inspection and inventory of all tools, tool boxes, and equipment that could be used as weapons before entering and leaving the facility.

In SPCs/CDFs:

An officer shall accompany non-employee workers when in the facility, to ensure that security and safety precautions/procedures are followed at all times, including removing tools at the end of each shift.

Before a detainee or housing officer carrying tool(s) or other item(s) can enter a housing unit, everything he/she is carrying (including, but not limited to, tools) shall be inventoried by a staff member. The Housing Officer shall verify the tools' removal from the housing area in a second inventory before allowing the detainee or housing officer to exit the unit. The Housing Officer shall immediately report discrepancies to the shift supervisor.

**IV. AMERICAN CORRECTIONAL ASSOCIATION STANDARDS REFERENCED:**

American Correctional Association 3rd Edition Standards for Adult Local Detention Facilities: 3-ALDF-3A-22

**Approval of Standard**



**Michael D. Cronin  
Acting Executive Associate Commissioner  
Office of Programs**

SEP 20 2000

**Date**



**Michael A. Pearson  
Executive Associate Commissioner  
Office of Field Operations**

SEP 20 2000

**Date**

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

**Policy:** 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.

<b>TOOL CONTROL</b>			
<b>Components</b>	<b>Yes</b>	<b>No</b>	<b>Remarks</b>
1. Is there an individual who is responsible for developing a tool control procedure and an inspection system to insure accountability?			
2. Are department heads responsible for implementing this standard in their departments?			
3. Are tool inventories required for: a. Maintenance Department b. Medial Department c. Food Service Department d. Electronics Shop e. Recreation Department f. Armory			
4. Does the facility have a facility policy for the regular inventory of all tools? a. Does the policy set minimum time lines for physical inventory and all necessary documentation? b. Do INS facilities use AMIS bar code labels when required?			
5. Are the tool inventories conducted as specified in the detention standard?			
6. In SPCs/CDFs, who is responsible for developing a tool control procedure and an inspection system to insure compliance?			

TOOL CONTROL			
Components	Yes	No	Remarks
<p>7. Does the facility have a tool classification system? If so, are the tools classified according to:</p> <p>a. Restricted (dangerous/hazardous)</p> <p>b. Non Restricted (non-hazardous).</p>			
<p>8. Are department heads responsible for implementing tool-control procedures? If so, are they required to:</p> <p>a. Prepare a computer-generated inventory of all class "R" tools?</p> <p>b. Post a copy of the class "R" tool inventory with the equipment, in a prominent position?</p> <p>c. Post a copy of the class "R" tool inventory with the equipment, in a prominent position?</p> <p>d. Submit a second copy of the inventory to the CDEO</p> <p>e. Retain a third copy in the department</p> <p>f. Repeat the class "R" tool inventory on a regular schedule (at least weekly, monthly, or quarterly), as follows:  Food service department–weekly  Maintenance department  medical facility–monthly  Electronics work area, recreation area(s), armory–quarterly</p> <p>g. Send a copy of the inventory report to the OIC.</p> <p>h. Report missing tools in accordance with procedures in the standard? (see section III.H., below).</p>			
<p>9. Does the facility have policies and procedures in place to ensure that all tools are marked and readily identifiable?</p>			

<b>TOOL CONTROL</b>			
<b>Components</b>	<b>Yes</b>	<b>No</b>	<b>Remarks</b>
<p>10. Does the facility have an approved tool storage system?</p> <p>a. Does the system ensure that all stored tools are accountable?</p> <p>b. Are commonly used tools (tools that can be mounted) stored in such a way that missing tool are readily notice?</p>			
<p>11. Does each facility have procedures for the issuance of tools to staff and detainees?</p> <p>a. Is the restricted tool issued only to the individual who will be using it?</p> <p>b. Are detainees permitted to use non-restricted tools under intermittent supervision?</p> <p>c. Is a metal or plastic chit receipt used to sign out tools?</p> <p>d. Has the OIC established site-specific procedures for the control of ladders, extension cords, and ropes.</p> <p>e. Does the CDEO or contract equivalent approve the issuance of tools to a specified project for extended periods.</p>			
<p>12. Does the facility have policies and procedures to address the issue of lost tools? If so:</p> <p>a. Does the policy and procedures include</p> <p>i. Verbal and written notification?</p> <p>ii. Procedures for detainee access?</p> <p>iii. Necessary documentation/review for all incidents of lost tools?</p>			
<p>12. Are broken or worn out tools surveyed and disposed of in an appropriate and secure manner?</p>			
<p>13. Do all private or contract repair and maintenance workers under contract to the INS, or other visitors, submit an inventory of all tools prior to admittance into or departure from the facility?</p>			

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

**TOOL CONTROL**

**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. Tool inventories			
B. Review of facility policy and procedure			
C. Housing unit log books			
D. Observation of tool issuance			
E. Detainee and staff interviews			

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

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

\_\_\_\_\_  
Auditor's Signature

\_\_\_\_\_  
Date