

From: (b)(6);(b)(7)(C)
Sent: 27 Jun 2018 19:46:44 +0000
To: (b)(6);(b)(7)(C)
Subject: FW: Permission to Publish
Attachments: ICE Audit 2014-15 re VWP 041218_Redacted.pdf

FYSA

(b)(6);(b)(7)(C) | Associate Legal Advisor
District Court Litigation Division
Office of the Principal Legal Advisor
U.S. Immigration & Customs Enforcement
202-732-(b)(6);(desk) | 202-875-(b)(6);(cell)

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Sent: Wednesday, June 27, 2018 3:45 PM
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Cc:
Subject: RE: Permission to Publish

Dear (b)(6);(b)(7)(C)

(b)(6);(b)(7)(C) asked that I respond on her behalf given her schedule today. ICE has reviewed the attached document and determined it is releasable for your use in litigation, subject to the included redactions.

Thanks,

(b)(6);(b)(7)(C)

(b)(6);(b)(7)(C) | Associate Legal Advisor
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Office of the Principal Legal Advisor
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From: (b)(6);(b)(7)(C)
Sent: Tuesday, June 26, 2018 1:47 PM

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Can I get ICE authorization to publish this document with a motion to dismiss we are filing tomorrow?

(b)(6);(b)(7)(C)

III Branches Law, PLLC
1019 Regents Blvd. Ste. 204

Fircrest, WA 98466

253-566-(b)(6) (p)

281-664-4643 (f)

(b)(6);(b)(7)(C)

Department of Homeland Security
 Immigration and Customs Enforcement: Office of Enforcement and Removal Operations

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



**Performance-Based National Detention Standards 2011 Inspection Worksheet
 for Over 72 Hour Facilities**

REVIEW TEAM USE: (Edits Permitted, ALL FIELDS REQUIRED)

Facility Information			
Facility Name: Northwest Contract Detention Facility		Review Purpose: Annual	
Facility Type: CDF <small>Intergovernmental Service Agreement (IGSA), ICE Service Processing Center (SPC), ICE Contract Detention Facility (CDF)</small>			
Address: 1623 E. J Street			
City: Tacoma	State: WA	Zip: 98421	
County: Pierce			
CEO Name: [REDACTED]		CEO Title: Warden	
Review Information (Use following format for dates: mm/dd/yyyy)			
Start Date: 4/15/2014	End Date: 4/17/2014	Review Type: Headquarters	
Lead Name: [REDACTED]		Lead Title: LCI	
Review Document Issue Summary (See Document Check Section to Review/Update)			
Error(s) Found: 0	Items Not Rated:		0

ICE HQ USE ONLY: (DO NOT EDIT*)

Form Name: G324A_PBNDS	Form Key: 8	Form Date: 11/14/2012
Form Type: PBNDS	Form Review Type: Annual	Form Over/Under 72 Status: 072

*If Edits are required, contact ICE HQ for an updated form.

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G-324A (Coded 10122010) Detention Review Worksheet - Rev: 11/14/2012 - Form Key 8

Table of Contents

INTRODUCTION TO THE G324A OVER 72 HOUR FACILITY DETENTION REVIEW

WORKSHEETS 4

 WHAT IS "PERFORMANCE-BASED"? 4

 WORKSHEET OVERVIEW 4

 WORKSHEET COMPLETION 5

SECTION I: SAFETY 6

 STANDARD 1.1. EMERGENCY PLANS (KEY: A) 7

 STANDARD 1.2. ENVIRONMENTAL HEALTH AND SAFETY (KEY: B) 10

 STANDARD 1.3. TRANSPORTATION (BY LAND) (KEY: C) 14

SECTION II: SECURITY 16

 STANDARD 2.1. ADMISSION AND RELEASE (KEY: D) 17

 STANDARD 2.2. CUSTODY CLASSIFICATION SYSTEM (KEY: E) 20

 STANDARD 2.3. CONTRABAND (KEY: F) 23

 STANDARD 2.4. FACILITY SECURITY AND CONTROL (KEY: G) 24

 STANDARD 2.5. FUNDS AND PERSONAL PROPERTY (KEY: H) 27

 STANDARD 2.6. HOLD ROOMS IN DETENTION FACILITIES (KEY: I) 31

 STANDARD 2.7. KEY AND LOCK CONTROL (KEY: J) 34

 STANDARD 2.8. POPULATION COUNTS (KEY: K) 36

 STANDARD 2.9. POST ORDERS (KEY: L) 37

 STANDARD 2.10. SEARCHES OF DETAINEES (KEY: M) 39

 STANDARD 2.11. SEXUAL ABUSE AND ASSAULT PREVENTION AND INTERVENTION (KEY: N) 41

 STANDARD 2.12. SPECIAL MANAGEMENT UNITS (KEY: O) 47

 STANDARD 2.13. STAFF-DETAINEE COMMUNICATION (KEY: P) 55

 STANDARD 2.14. TOOL CONTROL (KEY: Q) 58

 STANDARD 2.15. USE OF FORCE AND RESTRAINTS (KEY: R) 60

SECTION III: ORDER 64

 STANDARD 3.1. DISCIPLINARY SYSTEM (KEY: S) 65

SECTION IV: CARE 68

 STANDARD 4.1. FOOD SERVICE (KEY: T) 69

Performance-Based National Detention Standards 2011 Inspection Worksheet for Over 72 Hour Facilities

STANDARD 4.2. HUNGER STRIKES (KEY: U) 76

STANDARD 4.3. MEDICAL CARE (KEY: V)..... 79

STANDARD 4.4. MEDICAL CARE (WOMEN) (KEY: W) 99

STANDARD 4.5. PERSONAL HYGIENE (KEY: X) 102

STANDARD 4.6. SIGNIFICANT SELF-HARM AND SUICIDE PREVENTION AND INTERVENTION (KEY: Y)..... 105

STANDARD 4.7. TERMINAL ILLNESS, ADVANCE DIRECTIVES, AND DEATH (KEY: Z) 109

SECTION V: ACTIVITIES 113

STANDARD 5.1. CORRESPONDENCE AND OTHER MAIL (KEY: AA)..... 114

STANDARD 5.2. TRIPS FOR NON-MEDICAL EMERGENCIES (KEY: AB) 117

STANDARD 5.3. MARRIAGE REQUESTS (KEY: AC)..... 118

STANDARD 5.4. RECREATION (KEY: AD)..... 119

STANDARD 5.5. RELIGIOUS PRACTICES (KEY: AE)..... 122

STANDARD 5.6. TELEPHONE ACCESS (KEY: AF) 125

STANDARD 5.7. VISITATION (KEY: AG) 129

STANDARD 5.8. VOLUNTARY WORK PROGRAM (KEY: AH)..... 132

SECTION VI: JUSTICE 135

STANDARD 6.1. DETAINEE HANDBOOK (KEY: AI)..... 136

STANDARD 6.2. GRIEVANCE SYSTEM (KEY: AJ) 140

STANDARD 6.3. LAW LIBRARIES AND LEGAL MATERIALS (KEY: AK) 144

STANDARD 6.4. LEGAL RIGHTS GROUP PRESENTATIONS (KEY: AL)..... 148

SECTION VII: ADMINISTRATION & MANAGEMENT 151

STANDARD 7.1. DETENTION FILES (KEY: AM)..... 152

STANDARD 7.2. INTERVIEWS AND TOURS (KEY: AN) 154

STANDARD 7.3. STAFF TRAINING (KEY: AO)..... 156

STANDARD 7.4. DETAINEE TRANSFERS (KEY: AP)..... 161

DOCUMENT CHECK..... 165

Performance-Based National Detention Standards 2011 Inspection Worksheet for Over 72 Hour Facilities

STANDARD 5.8. VOLUNTARY WORK PROGRAM (Key: AH)

This detention standard provides detainees opportunities to work and earn money while confined, subject to the number of work opportunities available and within the constraints of safety, security, and good order of the facility. While not legally required to do so, ICE/ERO affords working detainees basic Occupational Safety and Health Administration (OSHA) protections.

Standard N/A

Click the above button if ICE detainees are not authorized to work at the IGSA facility. (All Line Items and standard will be rated "N/A")

Components	Rating	Remarks (1000 Char Max)
9. The facility administrator shall establish procedures for informing detainee volunteers about on-the-job responsibilities and reporting procedures.	Meets Standard	
10. When a detainee is removed from a work detail, staff place the written justification for the action in the detainee's detention file. Detainees are permitted to file a grievance to the facility administrator or local Field Office Director if they believe they were unfairly removed from work.	Meets Standard	A detainee may be removed from a work detail for cause. Upon such a removal, a written justification for the action is generated and subsequently placed in the detainee's detention file. Detainees are permitted to file grievances at any time to any facility or ICE employee regarding any concern.
11. All detention facilities shall comply with all applicable health and safety regulations and standards, to include training.	Meets Standard	
12. The facility administrator shall ensure that all department heads, in collaboration with the facility's safety/training officer, develop and institute appropriate training for all detainee workers.	Meets Standard	The warden, in conjunction with the training director, requires each department to provide training for its detainee workers, specific to their assigned duties.
13. Upon a detainee's assignment to a job or detail, the supervisor shall provide thorough instructions regarding safe work methods and, if relevant, hazardous materials.	Meets Standard	
14. The facility shall provide detainees with safety equipment that meets OSHA and other standards associated with the task performed.	Meets Standard	
15. The facility administrator shall implement procedures for immediately and appropriately responding to on-the-job injuries, including immediate notification of ICE/ERO.	Meets Standard	Policy establishes procedures for a detainee's work supervisor and medical personnel to follow in the event of an on-the-job injury. Procedures include prompt notification of ICE/ERO.

STANDARD 5.8. VOLUNTARY WORK PROGRAM – Reviewer Summary

(Use following format for dates: mm/dd/yyyy)

Performance-Based National Detention Standards 2011 Inspection Worksheet for Over 72 Hour Facilities

STANDARD 5.8. VOLUNTARY WORK PROGRAM (Key: AH)

This detention standard provides detainees opportunities to work and earn money while confined, subject to the number of work opportunities available and within the constraints of safety, security, and good order of the facility. While not legally required to do so, ICE/ERO affords working detainees basic Occupational Safety and Health Administration (OSHA) protections.

Standard N/A

Click the above button if ICE detainees are not authorized to work at the IGSA facility. (All Line Items and standard will be rated "N/A")

Components	Rating	Remarks (1000 Char Max)
1. Detainees who are physically and mentally able to work shall be provided the opportunity to participate in a voluntary work program.	Meets Standard	
2. The detainee's classification level shall determine the type of work assignment for which he/she is eligible. Generally, high custody detainees shall not be given work opportunities outside their housing units/living areas.	Meets Standard	
3. ICE detainees may not work outside the secure perimeter of non-dedicated IGSA facilities.	Meets Standard	No detainees are permitted to work outside the secure perimeter of the facility.
4. The facility administrator shall develop site-specific rules for selecting work detail volunteers in a facility procedure that will include a voluntary work program agreement.	Meets Standard	Policy identifies classification levels for specific work assignments and prescribes the selection process for the assignments. Procedures include use of a voluntary work program agreement.
5. Detainees shall not be denied voluntary work opportunities on the basis of such factors as a detainee's race, religion, national origin, gender, sexual orientation or disability.	Meets Standard	Policy states that detainee volunteers will not be denied work opportunities based upon non-merit factors such as social group, race, religion, gender, physical and/or mental disabilities, national origin or sexual orientation.
6. While medical or mental health restrictions may prevent some physically or mentally challenged detainees from working, those with less severe disabilities shall have the opportunity to participate in the voluntary work program in appropriate work assignments.	Meets Standard	
7. Detainees who participate in the volunteer work program are required to work according to a fixed schedule that does not exceed 8 hours daily, 40 hours weekly.	Meets Standard	Fixed work schedules are established for all detainee work assignments. Work schedules do not exceed eight hours a day or 40 hours a week.
8. Detainees shall receive monetary compensation for work completed in accordance with the facility's standard policy of at least \$1.00 (USD) per day.	Meets Standard	Per policy, detainees receive monetary compensation for work performed. A stipend of \$1.00 per day is paid.

Performance-Based National Detention Standards 2011 Inspection Worksheet for Over 72 Hour Facilities

STANDARD 5.8. VOLUNTARY WORK PROGRAM – Reviewer Summary

(Use following format for dates: mm/dd/yyyy)

Overall Remarks: *(Record significant facts, observations, other sources used, etc.) (5000 Character Max)*

Review of policy and departmental training records, interviews with the trust fund clerk, the training director and department/detail supervisors and a cross-check of the classification levels for specific detainee work details revealed that detainees have the opportunity to work and earn money in a structured, safe work environment.

Overall Rating: Meets Standard

Reviewer Name (Printed): [REDACTED]

Completion Date: 4/17/2014

Reviewer Signature (for printed form submission): [REDACTED]

Department of Homeland Security
 Immigration and Customs Enforcement: Office of Enforcement and Removal Operations

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



**Performance-Based National Detention Standards 2011 Inspection Worksheet
 for Over 72 Hour Facilities**

REVIEW TEAM USE: (Edits Permitted, ALL FIELDS REQUIRED)

Facility Information			
Facility Name: Northwest Contract Detention Center		Review Purpose: Annual	
Facility Type: CDF <small>Intergovernmental Service Agreement (IGSA), ICE Service Processing Center (SPC), ICE Contract Detention Facility (CDF)</small>			
Address:	1623 E. J Street		
City: Tacoma	State: WA	Zip: 98421	
County:	Pierce		
CEO Name:	[REDACTED]		CEO Title: Warden
Review Information (Use following format for dates: mm/dd/yyyy)			
Start Date: 4/14/2015	End Date: 4/16/2015	Review Type: Headquarters	
Lead Name:	[REDACTED]		Lead Title: LCI
Review Document Issue Summary (See Document Check Section to Review/Update)			
Error(s) Found:	0	Items Not Rated:	0

ICE HQ USE ONLY: (DO NOT EDIT*)

Form Name: G324A_PBNDS	Form Key: 8	Form Date: 11/14/2012
Form Type: PBNDS	Form Review Type: Annual	Form Over/Under 72 Status: 072

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Table of Contents

INTRODUCTION TO THE G324A OVER 72 HOUR FACILITY DETENTION REVIEW

WORKSHEETS.....4

 WHAT IS “PERFORMANCE-BASED”?4

 WORKSHEET OVERVIEW4

 WORKSHEET COMPLETION5

SECTION I: SAFETY6

 STANDARD 1.1. EMERGENCY PLANS (KEY: A)7

 STANDARD 1.2. ENVIRONMENTAL HEALTH AND SAFETY (KEY: B)11

 STANDARD 1.3. TRANSPORTATION (BY LAND) (KEY: C)15

SECTION II: SECURITY.....18

 STANDARD 2.1. ADMISSION AND RELEASE (KEY: D)19

 STANDARD 2.2. CUSTODY CLASSIFICATION SYSTEM (KEY: E)23

 STANDARD 2.3. CONTRABAND (KEY: F)26

 STANDARD 2.4. FACILITY SECURITY AND CONTROL (KEY: G)28

 STANDARD 2.5. FUNDS AND PERSONAL PROPERTY (KEY: H)31

 STANDARD 2.6. HOLD ROOMS IN DETENTION FACILITIES (KEY: I)35

 STANDARD 2.7. KEY AND LOCK CONTROL (KEY: J)39

 STANDARD 2.8. POPULATION COUNTS (KEY: K)42

 STANDARD 2.9. POST ORDERS (KEY: L)44

 STANDARD 2.10. SEARCHES OF DETAINEES (KEY: M)46

 STANDARD 2.11. SEXUAL ABUSE AND ASSAULT PREVENTION AND INTERVENTION (KEY: N).....48

 STANDARD 2.12. SPECIAL MANAGEMENT UNITS (KEY: O)54

 STANDARD 2.13. STAFF-DETAINEE COMMUNICATION (KEY: P)64

 STANDARD 2.14. TOOL CONTROL (KEY: Q)68

 STANDARD 2.15. USE OF FORCE AND RESTRAINTS (KEY: R).....71

SECTION III: ORDER76

 STANDARD 3.1. DISCIPLINARY SYSTEM (KEY: S)77

SECTION IV: CARE.....81

 STANDARD 4.1. FOOD SERVICE (KEY: T)82

Performance-Based National Detention Standards 2011 Inspection Worksheet for Over 72 Hour Facilities

STANDARD 4.2. HUNGER STRIKES (KEY: U).....90

STANDARD 4.3. MEDICAL CARE (KEY: V)94

STANDARD 4.4. MEDICAL CARE (WOMEN) (KEY: W)116

STANDARD 4.5. PERSONAL HYGIENE (KEY: X).....120

STANDARD 4.6. SIGNIFICANT SELF-HARM AND SUICIDE PREVENTION AND INTERVENTION (KEY: Y)123

STANDARD 4.7. TERMINAL ILLNESS, ADVANCE DIRECTIVES, AND DEATH (KEY: Z)128

SECTION V: ACTIVITIES132

STANDARD 5.1. CORRESPONDENCE AND OTHER MAIL (KEY: AA)133

STANDARD 5.2. TRIPS FOR NON-MEDICAL EMERGENCIES (KEY: AB).....136

STANDARD 5.3. MARRIAGE REQUESTS (KEY: AC)137

STANDARD 5.4. RECREATION (KEY: AD)139

STANDARD 5.5. RELIGIOUS PRACTICES (KEY: AE)142

STANDARD 5.6. TELEPHONE ACCESS (KEY: AF).....145

STANDARD 5.7. VISITATION (KEY: AG).....149

STANDARD 5.8. VOLUNTARY WORK PROGRAM (KEY: AH)152

SECTION VI: JUSTICE155

STANDARD 6.1. DETAINEE HANDBOOK (KEY: AI).....156

STANDARD 6.2. GRIEVANCE SYSTEM (KEY: AJ)159

STANDARD 6.3. LAW LIBRARIES AND LEGAL MATERIALS (KEY: AK)163

STANDARD 6.4. LEGAL RIGHTS GROUP PRESENTATIONS (KEY: AL)168

SECTION VII: ADMINISTRATION & MANAGEMENT171

STANDARD 7.1. DETENTION FILES (KEY: AM)172

STANDARD 7.2. INTERVIEWS AND TOURS (KEY: AN)174

STANDARD 7.3. STAFF TRAINING (KEY: AO)176

STANDARD 7.4. DETAINEE TRANSFERS (KEY: AP)181

DOCUMENT CHECK185

Performance-Based National Detention Standards 2011 Inspection Worksheet for Over 72 Hour Facilities

STANDARD 5.8. VOLUNTARY WORK PROGRAM (Key: AH)		
<p>This detention standard provides detainees opportunities to work and earn money while confined, subject to the number of work opportunities available and within the constraints of safety, security, and good order of the facility. While not legally required to do so, ICE/ERO affords working detainees basic Occupational Safety and Health Administration (OSHA) protections.</p>		
<p>Standard N/A</p>		
<p>Click the above button if ICE detainees are not authorized to work at the IGSA facility. (All Line Items and standard will be rated "N/A")</p>		
Components	Rating	Remarks (1000 Char Max)
1. Detainees who are physically and mentally able to work shall be provided the opportunity to participate in a voluntary work program.	Meets Standard	Policy and the detainee handbook describe the voluntary work program. Physically and mentally disabled detainees may participate.
2. The detainee's classification level shall determine the type of work assignment for which he/she is eligible. Generally, high custody detainees shall not be given work opportunities outside their housing units/living areas.	Meets Standard	
3. ICE detainees may not work outside the secure perimeter of non-dedicated IGSA facilities.	Meets Standard	Policy prohibits detainees from working outside the secure perimeter.
4. The facility administrator shall develop site-specific rules for selecting work detail volunteers in a facility procedure that will include a voluntary work program agreement.	Meets Standard	Policy outlines the voluntary work program and worker selection criteria. Detainees must sign a voluntary work program agreement before they can participate in the program.
5. Detainees shall not be denied voluntary work opportunities on the basis of such factors as a detainee's race, religion, national origin, gender, sexual orientation or disability.	Meets Standard	
6. While medical or mental health restrictions may prevent some physically or mentally challenged detainees from working, those with less severe disabilities shall have the opportunity to participate in the voluntary work program in appropriate work assignments.	Meets Standard	Policy and the detainee handbook describe the voluntary work program. Detainees with physical and/or mental disabilities may participate.
7. Detainees who participate in the volunteer work program are required to work according to a fixed schedule that does not exceed 8 hours daily, 40 hours weekly.	Meets Standard	
8. Detainees shall receive monetary compensation for work completed in accordance with the facility's standard policy of at least \$1.00 (USD) per day.	Meets Standard	
9. The facility administrator shall establish procedures for informing detainee volunteers about on-the-job responsibilities and reporting procedures.	Meets Standard	Every ICE detainee participating in the voluntary work program completes a training program that addresses on-the-job responsibilities and reporting procedures.

Performance-Based National Detention Standards 2011 Inspection Worksheet for Over 72 Hour Facilities

STANDARD 5.8. VOLUNTARY WORK PROGRAM (Key: AH)		
<p>This detention standard provides detainees opportunities to work and earn money while confined, subject to the number of work opportunities available and within the constraints of safety, security, and good order of the facility. While not legally required to do so, ICE/ERO affords working detainees basic Occupational Safety and Health Administration (OSHA) protections.</p>		
<p>Standard N/A</p>		
<p>Click the above button if ICE detainees are not authorized to work at the IGSA facility. (All Line Items and standard will be rated "N/A")</p>		
Components	Rating	Remarks (1000 Char Max)
10. When a detainee is removed from a work detail, staff place the written justification for the action in the detainee's detention file. Detainees are permitted to file a grievance to the facility administrator or local Field Office Director if they believe they were unfairly removed from work.	Meets Standard	
11. All detention facilities shall comply with all applicable health and safety regulations and standards, to include training.	Meets Standard	
12. The facility administrator shall ensure that all department heads, in collaboration with the facility's safety/training officer, develop and institute appropriate training for all detainee workers.	Meets Standard	The warden, in conjunction with the training administrator, requires each department to provide training for its detainee workers, specific to their assigned duties.
13. Upon a detainee's assignment to a job or detail, the supervisor shall provide thorough instructions regarding safe work methods and, if relevant, hazardous materials.	Meets Standard	Review of records indicated that detainees receive thorough training regarding safe work methods and hazardous substances upon assignment to a job or detail.
14. The facility shall provide detainees with safety equipment that meets OSHA and other standards associated with the task performed.	Meets Standard	
15. The facility administrator shall implement procedures for immediately and appropriately responding to on-the-job injuries, including immediate notification of ICE/ERO.	Meets Standard	Policy establishes procedures for a detainee's work supervisor and medical personnel to follow in the event of an on-the-job injury. Procedures include prompt notification of ICE/ERO.

STANDARD 5.8. VOLUNTARY WORK PROGRAM – Reviewer Summary
<p><i>(Use following format for dates: mm/dd/yyyy)</i></p>
<p>Overall Remarks: <i>(Record significant facts, observations, other sources used, etc.) (5000 Character Max)</i></p> <p>Detainees are required to maintain their immediate living area in a neat and orderly manner. A detainee can work in only one work detail per day. Detainees who are not classified cannot work in the voluntary work program. The facility has a system that ensures that detainees receive the pay owed them prior to the detainee being released or transferred. Detainees can be removed from work assignments for various reasons that include unsatisfactory performance, physical inability to do the work, prevention of injury and removal sanctions imposed by the Institutional Disciplinary Panel.</p> <p>During the evaluation of this standard, policy and the standard were reviewed, employees were interviewed and documentation was reviewed. The facility allows ICE detainees to work within the constraints of their security level. They</p>

Performance-Based National Detention Standards 2011 Inspection Worksheet for Over 72 Hour Facilities

STANDARD 5.8. VOLUNTARY WORK PROGRAM – Reviewer Summary <i>(Use following format for dates: mm/dd/yyyy)</i>	
receive appropriate training as required prior to starting their assignments. Policy and practice address all areas required by the detention standard.	
Overall Rating: Meets Standard	
Reviewer Name (Printed): ██████████	Completion Date: 4/16/2015
Reviewer Signature (for printed form submission):	