



U.S. Department of Homeland Security
Immigration and Customs Enforcement
Office of Professional Responsibility
Management Inspections and Detention Oversight
Washington, DC 20536-5501

Office of Detention Oversight Compliance Inspection

Enforcement and Removal Operations
Atlanta Field Office
North Georgia Detention Center
Gainesville, Georgia

May 8 - 10, 2012

~~FOR INTERNAL USE ONLY. This document may contain sensitive commercial, financial, law enforcement, management, and employee information. It has been written for the express use of the Department of Homeland Security to identify and correct management and operational deficiencies. In reference to ICE Policy 17006.1, issued 09/22/05; any disclosure, dissemination, or reproduction of this document, or any segments thereof, is prohibited without the approval of the Assistant Director, Office of Professional Responsibility.~~

**COMPLIANCE INSPECTION
NORTH GEORGIA DETENTION CENTER
ATLANTA FIELD OFFICE**

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
INSPECTION PROCESS	
Report Organization.....	6
Inspection Team Members.....	6
OPERATIONAL ENVIRONMENT	
Internal Relations	7
Detainee Relations	7
ICE PERFORMANCE BASED NATIONAL DETENTION STANDARDS	
Detention Standards Reviewed.....	8
Detainee Handbook.....	9
Food Service	10
Staff-Detainee Communication	11

EXECUTIVE SUMMARY

The Office of Professional Responsibility (OPR), Office of Detention Oversight (ODO) conducted a Compliance Inspection (CI) of the North Georgia Detention Center (NGDC) in Gainesville, Georgia, from May 8-10, 2012. NGDC, which opened in October 1, 2009, is owned by Hall County, Georgia, and operated by the Corrections Corporation of America (CCA). U.S. Immigration and Customs Enforcement (ICE), Office of Enforcement and Removal Operations (ERO) began housing detainees at NGDC on October 1, 2009, under an Intergovernmental Service Agreement (IGSA) between ICE and Hall County. Only ICE detainees are housed at NGDC. Male and female detainees of security classification Level II and Level III (Level I – lowest threat; Level II – medium threat; Level III – highest threat) are detained at the facility for periods in excess of 72 hours. NGDC has a maximum capacity of 502 detainees. At the time of the CI, NGDC housed 259 ICE detainees (219 male; 40 female). The average daily detainee population is 349. The average length of stay is 16 days. Trinity Correctional Services provides food service, and CCA provides medical care. The facility holds accreditation from the American Corrections Association (ACA).

The ICE ERO Field Office Director in Atlanta, Georgia (FOD/Atlanta), is responsible for ensuring facility compliance with ICE policies and the 2008 Performance Based National Detention Standards (PBNDS). ODO confirmed with the Contracting Officer's Technical Representative (COTR) that in January 2010 the NGDC transitioned from the National Detention Standards (NDS) to the PBNDS. An Assistant Field Office Director (AFOD) located at the FOD/Atlanta has oversight responsibility for NGDC. ICE personnel are assigned to NGDC on a permanent basis. ICE staff is comprised of (b)(7)e Supervisory Detention and Deportation Officer (SDDO), (b)(7)e Immigration Enforcement Agents (IEA), (b)(7)e Deportation Officers (DO), and (b)(7)e Detention and Removal Assistant (DRA). There is no DSM assigned to the facility.

The Warden is the highest ranking official at NGDC and is responsible for oversight of daily operations. In addition to the Warden, supervisory staff at NGDC consists of an Assistant Warden, a Chief of Security, a Chief Unit Manager, a Quality Assurance Manager, a Safety Manager, a Training Manager, (b)(7)e Shift Supervisors, (b)(7)e Unit Managers (b)(7)e Assistant Unit Managers, a Human Resources Manager, and a Business Manager. The total number of non-ICE staff employed at NGDC is (b)(7)e The medical staff consists of a Health Services Administrator (HSA), a Medical Director, a Dentist, a Nurse Practitioner, a Mental Health Coordinator, (b)(7)e Registered Nurses (RN) (b)(7)e Licensed Practical Nurses (LPN), a Dental Assistant, a Medical Assistant, and a Medical Records Technician. There is currently a vacancy for a contract Psychiatrist.

In January 2011, ODO conducted a Quality Assurance Review (QAR) at NGDC of 24 NDS. Of the standards reviewed, 18 were in full compliance. The remaining six standards accounted for nine deficiencies. Use of the NDS during the January 2011 QAR was in error.

In July 2011, ERO Detention Standards Compliance Unit contractor, MGT of America, Inc., conducted an annual review of the PBNDS at NGDC. The facility received an overall rating of "Meets Standards" and was found compliant with all 39 standards reviewed.

During this CI, ODO reviewed 16 PBNDS. Thirteen standards were determined to be fully compliant. Three deficiencies were identified in the following three standards: Detainee Handbook (1 deficiency), Food Service (1), and Staff-Detainee Communication (1). None of the deficiencies identified during this CI were repeated deficiencies from the 2011 QAR.

This report details all deficiencies and refers to the specific, relevant sections of the PBNDS. ERO will be provided a copy of this report to assist in developing corrective actions to resolve the three identified deficiencies. These deficiencies were discussed with NGDC personnel on-site during the inspection, as well as during the closeout briefing conducted on May 10, 2012.

Overall, ODO found NGDC to be well-managed and in compliance with the standards inspected. ODO attributes the low number of deficiencies encountered during this inspection to the two inspections conducted during the 18 months preceding this CI, and consistent monitoring of detention conditions by the ICE employees located at the facility. The three identified deficiencies included an omission from the detainee handbook regarding procedures for requesting interpretive services, a lack of special menu items for each of the ten recognized federal holidays, and failure to use a Telephone Serviceability Worksheet to document weekly testing on telephones designated for detainee use.

During this CI, ODO observed the admission and release processing area at NGDC. All detainees are booked and properly searched for contraband and other prohibited items. Personal belongings are searched, inventoried, and documented as required. All detainees undergo medical screenings. Detainees are provided appropriate clothing and bedding based on current climatic conditions. Personal hygiene supplies are gender-specific and are replenished as needed without charge to detainees.

NGDC classification policy is comprehensive and adequately addresses the PBNDS requirement for an objective and uniformly applied classification process. All detainees received at NGDC are classified by ICE at the FOD/Atlanta prior to arrival at NGDC. NGDC staff reviews and abides by the classification determination made by ICE. Facility case managers complete an internal classification form, orientation checklist, and sexual abuse screening tool for each arriving detainee. ODO verified ten of ten detention files reviewed contained required classification documentation. A review of the detainee handbook confirmed it included information on the classification process and appeal procedures.

The NGDC disciplinary system includes progressive levels of review and appeal procedures. Prohibited acts are divided into four severity categories: Greatest, High, High-Moderate, and Low-Moderate. ODO reviewed three randomly-selected disciplinary packets, dated between July 19, 2011, and April 6, 2012, and verified all incidents were investigated by a supervisor within 24 hours. The Unit Manager chairs the Unit Disciplinary Committee (UDC), and the Chief of Security chairs the Institution Disciplinary Panel (IDP). All IDP hearings are conducted on the first business day after receipt of the UDC referral. ODO verified sanctions are imposed in accordance with established guidelines.

NGDC has processes and procedures in place to ensure detainees have the opportunity to file informal, formal, and emergency grievances, and to appeal the decisions. Grievance forms are

readily available in the housing units. The Chief of Operations is the designated Grievance Coordinator and is responsible for ensuring grievance activity is reported to NGDC executive staff. Grievance mailboxes are available in each housing unit, and detainees are instructed to contact their case managers if they require assistance completing grievance forms. ODO confirmed staff receives annual training on handling of grievances and procedures for forwarding allegations of staff misconduct through the chain of command. A review of the NGDC grievance log listed ten grievances filed since June 1, 2011, in the following categories: NGDC staff behavior (60%), sanitation (10%), mail (10%), and other (10%). Each grievance was responded to by the NGDC Grievance Officer within 15 calendar days, in accordance with the standards. Emergency grievances were resolved within 24 hours of receipt, also in accordance with the standards.

ODO found the food service area well-organized and clean. The food service operation at NGDC was confirmed to be in compliance with State regulations during the most recent annual inspection conducted by the Georgia Department of Community Health on February 24, 2012. NGDC management provided documentation confirming internal sanitation inspections are conducted daily, weekly, and monthly by NGDC food service and safety staff. Cleaning schedules are posted in all areas of the food service department. ODO verified pest control inspections and treatment are conducted monthly by an outside contractor. Walk-in freezers and coolers are maintained at proper temperatures. NGDC rotates stock using the first-in, first-out method. NGDC has a satellite system of meal service; meals are prepared in the central kitchen and delivered on thermal trays to housing areas. ODO verified food temperatures are in compliance with the PBNDS. The food quality was determined to be acceptable, and portions were adequate. A five-week cycle is followed for rotation of meals. A registered dietician completes a nutritional analysis and a statement of nutritional adequacy for each five-week meal cycle. NGDC has policies and procedures to ensure special diets are provided to detainees, as necessary.

ODO confirmed the medical care at NGDC is well-managed. The Medical Director is available 24 hours a day for medical and psychiatric consultations. Staffing is sufficient to meet detainee health needs. Tuberculosis screening, medications, treatment for special and chronic care needs, and follow-up care are provided in accordance with the Medical Care PBNDS. Consent is obtained prior to medical treatment. A physical examination (PE) of each detainee is completed within the required 14-day timeframe. The facility uses AT&T Language Line interpretation services for detainees who do not speak English or Spanish. Detainees access healthcare by placing written medical request forms available in English and Spanish in a secure "Sick Call" box located in each housing unit. Medical request forms are collected seven days a week and triaged on a timely basis to determine priority for care. Detainees in the Special Management Unit are seen daily by medical staff. Pharmacy services are provided by Diamond Pharmacy on a contractual basis. ODO inspected (b)(7)e custody, and (b)(7) medical staff records, and confirmed that all receive cardiopulmonary resuscitation (CPR) and first aid training during orientation and on an annual basis.

ODO reviewed transfer summaries for 21 detainees transferred from NGDC to other facilities. Each summary contained relevant medical information regarding tuberculosis screening, medications, and any required special instructions.

ODO reviewed NGDC records concerning Suicide Prevention and Intervention, and determined there were nine suicide watches and no suicides since the previous ODO inspection. Screening for suicide potential occurs as part of intake screening, and detainees at risk for suicide are referred to medical staff, housed, and monitored in accordance with the standard. The NGDC Suicide Prevention training curriculum covers required elements: recognizing signs of suicidal thinking, facility referral procedures, suicide-prevention techniques, responding to an in-progress suicide attempt, and identification of suicide risk factors. Inspection of records for (b)(7)c custody and (b)(7)e medical staff confirmed all received training during orientation and on an annual basis. A random record review of four detainees on suicide watch confirmed all records contained documentation required by the PBNDS, and suicide management was consistent with NGDC policy. ODO conducted a review of the logbook used for suicide watch and confirmed entries were made documenting 15-minute checks as required by the PBNDS.

ODO verified written procedures are in place to temporarily segregate detainees for administrative and disciplinary reasons. Inspection of the SMU verified the two units used for ICE detainees are well ventilated, adequately lit, appropriately heated, and maintained in a sanitary condition. All cells are equipped with beds securely fastened to the floor, toilets, wash basins, writing tables and chairs, and intercoms for direct communication with the officer in the SMU control station. There are showers and recreation cages. At the time of the review, there was a detainee in disciplinary segregation and a detainee in administrative segregation. The detainee in administrative segregation was pending an investigation for allegedly creating disturbances in multiple housing units. The detainee in disciplinary segregation was serving a sanction for threatening staff. Both detainees stated they received regular recreation, showers, meals, and telephone access, and that NGDC staff were responsive to their needs.

NGDC has a comprehensive use of force policy addressing all requirements of the Use of Force PBNDS. Confrontation avoidance and use of force as a last resort are features of the NGDC policy. NGDC conducts an annual policy review to ensure compliance with the PBNDS and to verify current practices. Review of training records for (b)(7)e officers confirmed completion of use of force training prior to assuming duty and annual training thereafter. All NGDC officers are authorized to carry Oleoresin Capsicum (OC) spray. Current training in OC was documented in all (b)(7)c records reviewed. The Special Operation and Response Team (SORT) at NGDC is comprised of (b)(7)e members assigned to rotating shifts to ensure availability.

The use of force and medical restraint policies include specific requirements and adequate controls for use of four point restraints. All NGDC correctional officers attend an initial two-hour class covering progressive and medical restraints, and annual refresher training thereafter. NGDC had not used four point restraints on detainees. There were two calculated use of force incidents, and one immediate use of force incident at NGDC involving detainees since the previous ODO inspection. An immediate use of force situation is created when a detainee's behavior constitutes a serious and immediate threat to self, staff, another detainee, property, or the security and orderly operation of the facility. In that situation, staff may respond without a supervisor's direction or presence. A calculated use of force occurs when a detainee is in a location where there is no immediate threat to the detainee or others. Prior to a calculated use of force, staff shall take the time to assess the possibility of resolving the situation without resorting to force. A calculated use of force needs to be authorized in advance by the facility

administrator. Review of written documentation and video recordings by ODO confirmed full compliance with the standard in all cases.

NGDC is in compliance with all requirements of the Telephone Access PBNDS. The total number of telephones for detainee use at NGDC is 38. That is a ratio of one telephone for every seven detainees. The PBNDS requires one telephone for every 25 detainees. All telephones were confirmed to be in working order. Separate rooms are available to provide privacy for detainees placing telephone calls to legal representatives.

All detainees have access to indoor and outdoor recreation areas. NGDC has a law library with two computers equipped with the most recent version of LexisNexis. Detainees have visitation privileges and access to religious services. NGDC provides elective classes in English as a Second Language (ESL), life skills, and anger management. These classes are well-received by the detainee population, and promote positive interaction between staff and detainees. ODO cites the availability of these classes as a best practice.

INSPECTION PROCESS

ODO inspections evaluate the welfare, safety, and living conditions of detainees. ODO primarily focuses on areas of noncompliance with the ICE NDS or the ICE PBNDS, as applicable. The PBNDS apply to NGDC. In addition, ODO may focus its inspection based on detention management information provided by ERO Headquarters (HQ) and ERO field offices, and on issues of high priority or interest to ICE executive management.

ODO reviewed the processes employed at NGDC to determine compliance with current policies and detention standards. Prior to the inspection, ODO collected and analyzed relevant allegations and detainee information from multiple ICE databases, including the Joint Integrity Case Management System (JICMS), the ENFORCE Alien Booking Module (EABM), and the ENFORCE Alien Removal Module (EARM). ODO also gathered facility facts and inspection-related information from ERO HQ staff to prepare for the site visit at NGDC.

REPORT ORGANIZATION

This report documents inspection results, serves as an official record, and is intended to provide ICE and detention facility management with a comprehensive evaluation of compliance with policies and detention standards. It summarizes those PBNDS that ODO found deficient in at least one aspect of the standard. ODO reports convey information to best enable prompt corrective actions and to assist in the on-going process of incorporating best practices in nationwide detention facility operations.

OPR classifies program issues into one of two categories: deficiencies and areas of concern. OPR defines a deficiency as a violation of written policy that can be specifically linked to the PBNDS, ICE policy, or operational procedure. OPR defines an area of concern as something that may lead to or risk a violation of the PBNDS, ICE policy, or operational procedure. When possible, the report includes contextual and quantitative information relevant to the cited standard. Deficiencies are highlighted in bold throughout the report and are encoded sequentially according to a detention standard designator.

Comments and questions regarding the report findings should be forwarded to the Deputy Division Director, OPR, ODO.

INSPECTION TEAM MEMBERS

(b)(6), (b)(7)c	Special Agent (Team Leader)	ODO, Houston
	Special Agent	ODO, Houston
	Special Agent	ODO, Houston
	Contract Inspector	Creative Corrections
	Contract Inspector	Creative Corrections
	Contract Inspector	Creative Corrections

OPERATIONAL ENVIRONMENT

INTERNAL RELATIONS

ODO interviewed supervisory ICE and NGDC staff, including the NGDC Warden, Assistant Warden, Chief of Security, the ERO AFOD, and an SDDO. NGDC and ICE staff stated that the working relationship between the two entities is excellent, and morale is high.

During the CI, ODO confirmed through a review of housing unit visitation logbooks and interviews with ICE and NGDC staff and detainees, that ICE staff and the Warden conduct regular and unscheduled visits to the housing units on a daily basis to address detainee concerns and inquiries. A review of NGDC visitation logs for 2012 indicated the AFOD visited NGDC on a monthly basis, and the Deputy Field Office Director has visited the facility twice this year.

The Warden stated he would welcome more detainees at NGDC, because the current detainee population is approximately half of the total housing capacity of 502.

In 2009, NGDC built a courtroom within the facility for the purpose of holding immigration hearings. The courtroom has Video Conferencing (VTC) and all the necessary equipment to make the courtroom fully functional; however, no immigration hearings have taken place at NGDC since the courtroom was built. ICE management stated that the FOD/Atlanta and the Office of Chief Counsel (OCC) remain in the planning phase for VTC operations with the Executive Office for Immigration Review (EOIR) in Atlanta, Georgia. EOIR is responsible for conducting immigration court proceedings. Conducting immigration court proceedings at NGDC would eliminate the need to transport detainees from NGDC to the Immigration Court in Atlanta, Georgia, and would likely reduce the average length of stay for detainees at NGDC.

DETAINEE RELATIONS

ODO randomly selected 25 detainees (17 males; 8 females) at NGDC to provide their assessment of the detention conditions at NGDC. The detainees stated they were treated with dignity and respect. Detainees stated they are able to send and receive mail, use the telephones, access religious services, engage in recreation, and use the law library. The detainees did not express any complaints about medical care.

All detainees were dissatisfied with the food served at the facility. The detainees stated that they were tired of eating beans, which are always on the menu. ODO verified that a five-week cycle is followed for rotation of meals, and a registered dietician completes a nutritional analysis and a statement of nutritional adequacy for each five-week cycle. The Warden informed ODO he was aware of dissatisfaction with the food variety among detainees; therefore, beginning May 18, 2012, a new menu will be implemented. The new menu will include popular items such as hamburgers, hot dogs, pasta, potatoes, vegetables, and fewer beans.

ICE PERFORMANCE BASED NATIONAL DETENTION STANDARDS

ODO reviewed a total of 16 PBNDS and found NGDC fully compliant with the following 13 standards:

- Admission and Release
- Classification System
- Disciplinary System
- Funds and Personal Property
- Grievance System
- Law Libraries and Legal Material
- Medical Care
- Personal Hygiene
- Special Management Units
- Suicide Prevention and Intervention
- Telephone Access
- Transfer of Detainees
- Use of Force and Restraints

As these standards were compliant at the time of the review, a synopsis for these areas was not prepared for this report.

ODO found deficiencies in the following three standards:

- Detainee Handbook
- Food Service
- Staff-Detainee Communication

Findings for these standards are presented in the remainder of this report.

DETAINEE HANDBOOK (DH)

ODO reviewed the Detainee Handbook standard at NGDC to determine if the facility provides each detainee with a handbook, written in English and any other languages spoken by a significant number of detainees housed at the facility, describing the facility's rules and sanctions, disciplinary system, mail and visiting procedures, grievance system, services, programs, and medical care, in accordance with the ICE PBNDS. ODO observed the admissions process, interviewed NGDC staff and detainees, and reviewed policies, procedures, the detainee handbook, and detention files.

NGDC local detainee handbooks are available in English and Spanish, and are provided to each detainee upon admission to the facility. Detainee handbooks are also available in each housing unit. ODO confirmed that if a detainee speaks a language other than English or Spanish, interpretation services are provided to explain the detainee handbook, but the procedures for requesting interpretive services are not contained in the detainee handbook (**Deficiency DH-1**). NGDC corrected the deficiency by adding an addendum to undistributed detainee handbooks. The updates to the detainee handbook were posted in each housing unit for detainees who had received a handbook that did not contain the addendum.

ODO randomly inspected 30 detention files to determine if detainees had received the handbook. All files contained documentation signed by the detainee acknowledging receipt of the detainee handbook.

STANDARD/POLICY REQUIREMENTS FOR DEFICIENT FINDINGS

DEFICIENCY DH-1

In accordance with the ICE PBNDS, Detainee Handbook, section (V)(2), the FOD must ensure, while all applicable topics from the ICE National Detainee Handbook must be addressed, it is particularly important that each local supplement notify each detainee of procedures for requesting interpretive services for essential communication.

FOOD SERVICE (FS)

ODO reviewed the Food Service standard at NGDC to determine if detainees are provided with a nutritious and balanced diet, in a sanitary manner, in accordance with the ICE PBNDS. ODO interviewed food service staff, reviewed documentation, inspected food storage areas, and observed food service operations.

The facility contracts Trinity Services Group (TSG) for management of the food service operation. The department is staffed by (b)(7)e employees, including the Food Service Manager (FSM), Assistant FSM, and (b)(7)e supervisors. There are 45 ICE detainees working in the food service area. TSG personnel and detainee workers were medically cleared to work in the food service area. Training records confirmed staff and detainees received training in food service operations.

The food service area is well-organized and clean. The food service operation at NGDC was confirmed to be in compliance with State regulations during the most recent annual inspection conducted by the Georgia Department of Community Health on February 24, 2012. NGDC management provided documentation confirming internal sanitation inspections are conducted daily, weekly, and monthly by NGDC food service and safety staff. Cleaning schedules are posted in all areas of the food service department. ODO verified pest control inspections and treatments are conducted monthly by an outside contractor. Material Safety Data Sheets (MSDS) and chemical accountability logs comply with policy and the PBNDS. Walk-in freezers and coolers operate at proper temperatures. NGDC rotates stock using the first-in, first-out method.

NGDC has a satellite system of meal service. Meals are prepared in the food service area, placed on thermal trays, and delivered to housing units. ODO verified food temperatures are in compliance with the PBNDS. A five-week cycle is followed for rotation of meals. A registered dietician provides a nutritional analysis and a statement of nutritional adequacy for each five-week meal cycle. Food quality is acceptable, and portions are adequate. Records of menu substitutions are documented on logs and reviewed by the FSM.

NGDC has policies and procedures to ensure special diets are provided to detainees for religious or medical reasons. Review of the common fare menu revealed it has special menus for only four of ten recognized federal holidays. The common fare menu does not include special menus for all ten recognized federal holidays (**Deficiency FS-1**).

STANDARD/ POLICY REQUIREMENTS FOR DEFICIENT FINDINGS

DEFICIENCY FS-1

In accordance with the ICE PBNDS, Food Service, section (V)(G)(2), the FOD must ensure Common Fare is intended to accommodate detainees whose religious dietary needs cannot be met on the mainline. The Common Fare menu is based on a 14-day cycle, with special menus for the 10 Federal holidays. The menus must be certified as exceeding minimum daily nutritional requirements and meeting daily allowances (RDAs). Beverages shall be selected from the regular menu.

STAFF-DETAINEE COMMUNICATION (SDC)

ODO reviewed the Staff-Detainee Communication standard at NGDC to determine if procedures are in place to allow formal and informal contact between detainees and key ICE and facility staff; and if ICE detainees are able to submit written requests to ICE staff and receive responses in a timely manner, in accordance with the ICE PBNDS. ODO interviewed ICE and NGDC staff and detainees, and reviewed the ICE detainee request electronic log and NGDC housing unit logbooks. ODO also reviewed telephone serviceability worksheets, facility liaison visit checklists, housing unit postings, drop box accessibility, and communication logbooks.

ICE staff is assigned to visit the facility on a weekly basis. The FOD/Atlanta has written policies and procedures to ensure and document that ICE supervisory and non-supervisory personnel conduct frequent unannounced and unscheduled visits. ODO verified there is one scheduled and one unscheduled visit conducted each week. The visits are documented. Schedules for weekly ICE staff visits are conspicuously posted in English and Spanish in each housing unit. These visits are documented on a Facility Liaison Visit Checklist.

NGDC has written procedures for detainees to submit written questions, requests, or concerns to ICE. There are secure boxes located in each housing unit for detainees to submit their ICE request forms. The secure boxes are only accessible by ICE staff. Detainee requests are logged and responded to within 72 hours of receipt.

ODO checked all telephones in the housing units and found them to be in working order. NGDC and ICE staff stated the telephones are tested each week by ERO staff, but a Telephone Serviceability Worksheet is not being used to document those weekly tests (**Deficiency SDC-1**). Documenting the serviceability of all telephones in detainee housing units ensures inoperable telephones are repaired in a timely manner.

STANDARD/POLICY REQUIREMENTS FOR DEFICIENT FINDINGS

DEFICIENCY SDC-1

In accordance with the ICE PBNDS, Staff-Detainee Communication, section (V)(C), the FOD must ensure that staff shall document each serviceability test on a form that has been provided by DRO [ERO], and each field office shall maintain those forms, organized by month, for three years. The Detention Standards Compliance Unit shall conduct random audits of field office compliance.