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**Office of Detention Oversight
Special Review
2024-003-266**

**Enforcement and Removal Operations
ERO Atlanta Field Office**

**Robert A Deyton Detention Facility
Lovejoy, Georgia**

November 14-16, 2023

**SPECIAL REVIEW
of the
ROBERT A DEYTON DETENTION FACILITY
Lovejoy, Georgia**

TABLE OF CONTENTS

FACILITY OVERVIEW	4
SPECIAL REVIEW PROCESS	5
FINDINGS BY NATIONAL DETENTION STANDARDS 2019 MAJOR CATEGORIES	6
DETAINEE RELATIONS	7
SPECIAL REVIEW FINDINGS	7
SAFETY	7
ENVIRONMENTAL HEALTH AND SAFETY	7
SECURITY	7
SPECIAL MANAGEMENT UNITS	7
SEXUAL ABUSE AND ASSAULT PREVENTION AND INTERVENTION	7
CONCLUSION	8

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FACILITY OVERVIEW

The U.S. Immigration and Customs Enforcement (ICE) Office of Professional Responsibility (OPR) Office of Detention Oversight (ODO) conducted a special review of the Robert A Deyton Detention Facility (RADDF) in Lovejoy, Georgia, from November 14 to 16, 2023.¹ The facility opened in 2007 and is owned by Clayton County and operated by The GEO Group, Inc. (GEO). The ICE Office of Enforcement and Removal Operations (ERO) began housing detainees at RADDF in 2018 under the oversight of ERO’s Field Office Director in Atlanta (ERO Atlanta). ICE is an authorized user of this facility under a United States Marshals Service intergovernmental agreement contract, which does not specify an ICE National Detention Standard (NDS), and ODO inspected to the NDS listed on the ERO Custody Management Division Authorized Facility List as of October 30, 2023. RADDF was inspected against NDS 2019, and ODO’s assigned rating is for ERO’s informational purposes only.

[REDACTED] A facility administrator handles daily operations and manages [REDACTED] support personnel. GEO provides food services and medical care, and Keefe Commissary provides commissary services at the facility. The facility was accredited by the American Correctional Association in January 2019 and the National Commission on Correctional Health Care in June 2020. In June 2020, RADDF was audited for the Department of Justice (DOJ) Prison Rape Elimination Act (PREA) and was DOJ PREA certified.

Capacity and Population Statistics	Quantity
ICE Bed Capacity ²	[REDACTED]
Average ICE Population ³	[REDACTED]
Adult Male Population (as of November 14, 2023)	[REDACTED]
Adult Female Population (as of November 14, 2023)	[REDACTED]

During its last special review, in Fiscal Year (FY) 2023, ODO found 5 deficiencies in the following areas: Environmental Health and Safety (1); Food Service (1); and Sexual Abuse and Assault Prevention and Intervention (3).

¹ This facility holds male and female detainees with medium-low, medium-high, and high security classification levels for periods greater than 72 hours.

² Data Source: ERO Custody Management Division Authorized Facility List as of October 30, 2023.

³ *Ibid.*

⁴ Despite a zero population count during the inspection, RADDF has an active contract to house ICE detainees and an FY 2023 average daily population of 3 detainees, which met ODO’s requirement for a special review.

SPECIAL REVIEW INSPECTION PROCESS

ODO conducts oversight inspections of ICE detention facilities with an average daily population of 10 or more, and where detainees are housed for over 72 hours, to assess compliance with ICE national detention standards. While these inspections focus on facility compliance with detention standards that directly affect detainee life, health, safety, and/or well-being, in FY 2024 ODO added additional standards to the scope of each full inspection to ensure ODO inspects every standard at each facility at least once every other year.⁵

ODO identifies violations of ICE detention standards, ICE policies, or operational procedures as “deficiencies.” ODO also highlights instances in which the facility resolves deficiencies prior to completion of the ODO inspection. Where applicable, these corrective actions are annotated with “C” under the *Special Review Findings* section of this report.

In FY 2022, ODO began conducting special reviews of under 72-hour ICE detention facilities with an ADP of 1 or more detainees and over 72-hour ICE detention facilities with an ADP of 1 to 9 detainees. Additionally, ODO began conducting unannounced inspections of ICE detention facilities, regardless of ADP of detainees, as well as reviews of ICE special/emerging detention facilities/programs. As such, these facility inspections will result in an ODO Inspection Compliance Rating; however, for facilities that are not contractually obligated to an ICE NDS, those ratings will be for ERO’s informational purposes. ODO will conduct a complete review of several core standards, in accordance with the facility’s contractually required ICE NDS or in accordance with the ICE NDS listed in the current ERO Custody Management Division Authorized Facility List for facilities that are not contractually obligated to an ICE NDS, which may include but are not limited to Medical Care/Health Care, Medical Care (Women)/Health Care (Females), Significant Self-Harm and Suicide Prevention and Intervention, Hunger Strikes, Food Service, Environmental Health and Safety, Special Management Units (SMU) or Hold Rooms (if the facility does not have an SMU), Use of Force and Restraints/Use of Physical Control Measures, and Sexual Abuse and Assault Prevention and Intervention.

Upon completion of each special review or unannounced inspection, ODO conducts a closeout briefing with facility and local ERO officials to discuss preliminary findings. A summary of these findings is shared with ERO management officials. Thereafter, ODO provides ICE leadership with a final compliance inspection report to: (i) assist ERO in developing and initiating uniform corrective action plans (UCAPs); and (ii) provide senior executives with an independent assessment of facility operations. ODO’s findings inform ICE executive management in their decision-making to better allocate resources across the agency’s entire detention inventory.

⁵ ODO reviews the facility’s compliance with selected standards in their entirety.

FINDINGS BY NATIONAL DETENTION STANDARDS 2019 MAJOR CATEGORIES

NDS 2019 Standards Inspected ^{6,7}	Deficiencies
Part 1 - Safety	
Environmental Health and Safety	1
Sub-Total	1
Part 2 - Security	
Use of Force and Restraints	0
Special Management Units	0
Sexual Abuse and Assault Prevention and Intervention	1
Sub-Total	1
Part 4 - Care	
Food Service	0
Hunger Strikes	0
Medical Care	0
Significant Self-Harm and Suicide Prevention and Intervention	0
Sub-Total	0
Part 5 - Activities	
Recreation	0
Sub-Total	0
Part 6 - Justice	
Detainee Handbook	0
Sub-Total	0
Total Deficiencies	2

⁶ For greater detail on ODO's findings, see the *Special Review Findings* section of this report.

⁷ During a special review, ODO will review a facility's compliance with at least 10 individual standards.

DETAINEE RELATIONS

The facility's ICE detainee population count was zero during the entire inspection; therefore, ODO did not conduct any detainee interviews. Despite the facility housing no detainees during the inspection, the facility maintains an active contract to house ICE detainees and had an FY 2023 ADP of 3, meeting the ODO requirement for special reviews.

SPECIAL REVIEW FINDINGS

SAFETY

ENVIRONMENTAL HEALTH AND SAFETY (EHS)

ODO interviewed the fire and safety manager, toured the facility, and found stained and discolored paint on the shower wall due to leaking water from behind a stainless-steel shower panel in one out of four shower stalls of the ICE detainee housing unit (**Deficiency EHS-64⁸**). **This is a repeat deficiency.**

SECURITY

SPECIAL MANAGEMENT UNIT (SMU)

ODO interviewed facility leadership, toured the SMU, reviewed SMU policies, and found no policy nor procedure pertaining to ICE detainee telephone access to attorneys, other legal representatives, and government offices such as the DHS Office of the Inspector General, DHS Office for Civil Rights and Civil Liberties, ICE/OPR Joint Intake Center, and embassies or consulates. Since the facility housed no detainees in the SMU during this inspection, ODO noted this finding as an **Area of Concern**.

ODO interviewed facility leadership, toured the SMU, reviewed SMU policies, and found no policy nor procedure pertaining to ICE detainee telephone access to family for personal emergencies, attorneys, other legal representatives, and government offices. Since the facility housed no detainees in the SMU during this inspection, ODO noted this finding as an **Area of Concern**.

SEXUAL ABUSE AND ASSAULT PREVENTION AND INTERVENTION (SAAPI)

ODO toured the facility and found no posting of the current SAAPI program coordinator's name (**Deficiency SAAPI-48⁹**). **This is a repeat deficiency.**

Corrective Action: Before the conclusion of the inspection, the facility initiated corrective

⁸ "General: Facility cleanliness and sanitation shall be maintained. All surfaces, fixtures, and equipment shall be kept clean and in good repair." See ICE NDS 2019, Standard, Environmental Health and Safety, Section (II)(I)(2).

⁹ "The facility shall provide detainees with the name of the program coordinator or designated staff member and information on how to contact him or her." See ICE NDS 2019, Standard, Sexual Abuse and Assault Prevention and Intervention, Section (II)(F)(1).

action by updating the name of the current SA-API program coordinator on postings in the housing units (C-1).

CONCLUSION

During this special review, ODO assessed the facility’s compliance with 10 standards under NDS 2019 and found the facility in compliance with 8 of those standards. ODO found two deficiencies in the remaining two standards. Since RADDF’s last special review in March 2023, the facility’s overall compliance has trended upward. RADDF went from 3 deficient standards and 5 deficiencies in March 2023 to 2 deficient standards and 2 deficiencies in the most recent special review. ODO notes one out of the two deficiencies found during this inspection are repeat deficiencies with no priority component(s). ODO found both administrative and operational deficiencies, as well as administrative **Areas of Concern**. The administrative deficiency was due to no postings with updated contact information of the interim SA-API Coordinator in the housing units. The administrative **Areas of Concern** included no SMU policies of detainee telephone access while in disciplinary segregation. ODO has not received the UCAP for ODO’s last special review of RADDF in March 2023 so ODO cannot assess the UCAP’s impact on the facility’s improved performance. ODO recommends ERO Atlanta continue to work with the facility to resolve deficiencies in accordance with contractual obligations.

Compliance Inspection Results Compared	FY 2023 Special Review NDS 2019	FY 2024 Special Review NDS 2019
Standards Reviewed	10	10
Deficient Standards	3	2
Overall Number of Deficiencies	5	2
Priority Component Deficiencies	1	0
Repeat Deficiencies	0	1
Areas Of Concern	0	2
Corrective Actions	1	1
Facility Rating	Good	Good ¹⁰

¹⁰ ODO revised their rating system at the end of FY 2023 and beginning in FY 2024, facilities rated as “Superior” will have no or very minimal deficiencies and will have no repeat or priority component deficiencies.