

Exhibit 69

Appendix A

Purpose, Scope, and Methodology

The *Consolidated Appropriations Security, Disaster Assistance, and Continuing Appropriations Act of 2009* (Public Law 110-329), and attached House Report 110-862, require that we report on the performance of 287(g) agreements with state and local authorities. Pursuant to these requirements, we (1) assessed ICE controls over 287(g) program implementation, (2) determined whether the terms of 287(g) agreements had been violated by any parties, and (3) evaluated the effectiveness, efficiency, and economy of 287(g) operations.

We conducted our fieldwork, which included more than 90 interviews, from February to July 2009. We interviewed civil rights and immigration-rights NGO representatives from Arizona, California, Florida, Georgia, Maryland, Massachusetts, North Carolina, and Washington, DC, in addition to ICE and LEA senior officials and staff.

We consulted with DHS Office for Civil Rights and Civil Liberties officials on civil rights and civil liberties issues, and technical aspects of immigration law. Office for Civil Rights and Civil Liberties representatives accompanied us on three site visits and assisted with outreach efforts to NGOs.

We also accompanied an ICE OPR inspection team on a scheduled site visit, and independently observed program activities at six other 287(g) program jurisdictions. We reviewed 287(g) activities at the following jurisdictions:

- Benton County Sheriff's Office, Bentonville, AR
- City of Springdale Police Department, Springdale, AR
- Los Angeles County Sheriff's Office, Los Angeles, CA
- Maricopa County Sheriff's Office, Phoenix, AZ
- Prince William Manassas Adult Detention Center, Manassas, VA
- Rogers Police Department, Rogers, AR
- Washington County Sheriff's Office, Fayetteville, AR

We selected locations for our site visits from among program sites that had been operating for more than one year. Selection criteria included (1) the type of program model in place, (2) the number of LEA officers active in the program, (3) the number of 287(g) arrests and removals, (4) indications of possible violations based on reports of civil rights concerns in media reports, court cases,

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and complaints and investigations, and (5) whether other oversight entities had completed or planned site visits to these locations.

We performed extensive document review and analysis of 287(g) agreements, standard operating procedures, directives and policies, budgetary information, personnel security records, training materials, program data, and statistical information.

ICE renegotiated its agreements with participating jurisdictions based on an MOA template it released in July 2009. The new agreements contain requirements that were not included in prior agreements, and eliminate others that were. We did not assess compliance with the terms of these new agreements, as they were not in effect at the time of our fieldwork.

We conducted this review under the authority of the *Inspector General Act of 1978*, as amended, and according to the *Quality Standards for Inspections* issued by the Council of the Inspectors General on Integrity and Efficiency.