



**AUDIT OF THE FEDERAL BUREAU OF PRISONS
RESIDENTIAL REENTRY CENTER CONTRACT WITH
VOLUNTEERS OF AMERICA TEXAS
CONTRACT NO. DJB200910
HUTCHINS, TEXAS**

U.S. Department of Justice
Office of the Inspector General
Audit Division

Audit Report GR-60-13-007
June 2013

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**AUDIT OF THE FEDERAL BUREAU OF PRISONS
RESIDENTIAL REENTRY CENTER CONTRACT WITH
VOLUNTEERS OF AMERICA TEXAS
CONTRACT NO. DJB200910
HUTCHINS, TEXAS**

EXECUTIVE SUMMARY*

The Office of the Inspector General (OIG), Audit Division, has completed an audit of the Federal Bureau of Prisons (BOP) Contract No. DJB200910, awarded to the Volunteers of America Texas. The purpose of the contract is to operate and manage the Residential Reentry Center (RRC) located in Hutchins, Texas (Hutchins RRC). A requirements contract was awarded for the Hutchins RRC on December 3, 2007, and as shown below, had an estimated award amount of over \$11 million for the base period and three option years. Actual costs for the base period and the first three option years (through December 31, 2012) were \$10,494,342.

EXHIBIT 1: CONTRACT PERIOD AND COSTS¹

Contract Period	From	To	Estimated Cost	Actual Cost
Base Period	03/01/08	02/28/10	\$ 4,583,370	\$ 4,064,272
Option Year 1	03/01/10	02/28/11	\$ 2,357,207	\$ 2,034,605
Option Year 2	03/01/11	02/29/12	\$ 2,427,871	\$ 2,353,064
Option Year 3 (through 12/31/12)	03/01/12	02/28/13	\$ 2,507,393	\$ 2,042,401
Total			\$ 11,875,840	\$ 10,494,342

Source: The contract and the list of contract-related expenditures

The objective of our audit was to review performance in the following areas: (1) BOP monitoring activities, (2) RRC policies and procedures, (3) RRC personnel, (4) RRC resident accountability, (5) RRC programs and activities, (6) billings, and (7) BOP contract solicitation and award.

* The full version of this report includes information that the Office of the Inspector General considered to be procurement sensitive, and therefore cannot not be publicly released. The Office of the Inspector General believes that disclosure of estimated man-days and per diem rates could impair future negotiations. To create this public version of the report, the Office of the Inspector General redacted portions of the full report.

¹ Throughout this report, differences between the aggregated costs and totals are due to rounding.

In conducting the audit, we obtained an understanding of the contract requirements along with the Hutchins RRC's controls and processes. We reviewed documents and conducted interviews at the Hutchins RRC and with BOP officials to determine if the contractor provided services in accordance with the contract and if billed costs were accurate. Our audit disclosed that the Hutchins RRC did not always comply with the BOP's Statement of Work (SOW) for RRC operations.

According to the BOP's Statement of Work (SOW) for RRC operations, an Individualized Program Plan (IPP) must be completed for each new inmate within 2 weeks of their arrival at the RRC. Out of the 51 inmate files examined, we found that IPPs were missing for 4 inmates (8 percent). Additionally, these IPPs must be updated every 2 weeks. We found the IPPs were not updated timely for 36 inmates.

The SOW requires the RRC to verify inmate employment by an on-site visit during the first 7 calendar days for all 35 inmates who were employed while at the RRC. We identified late initial employment verifications for six inmates (17 percent), and missing initial employment verifications for an additional three inmates (9 percent). The RRC is also required to conduct subsequent monthly employment checks. We found that the required subsequent monthly employment verifications were not always conducted for 12 inmates.

The SOW requires RRCs to submit a proposed release plan to the U.S. Probation Officer at least 6 weeks prior to the inmate's release date. We found that the release plans were not submitted timely to the U.S. Probation Officer for seven inmates (21 percent) out of the 33 inmates who were required to have release plans submitted at least 6 weeks prior to their release. We also found no release plans were submitted for an additional two inmates (5 percent) out of the 39 inmates for whom the RRC was required to complete a release plan.² The RRC must also complete a terminal report within 5 working days of an inmate's release. We found that terminal reports were not submitted timely for 13 inmates (26 percent) of the 50 inmates who were required to have terminal reports.³

² A total of 39 inmates in our sample were required to have release plans. However, only 33 inmates were required to have a release plan sent to the U.S. Probation Officer at least 6 weeks prior to their release because the remaining 6 inmates were at the RRC for less than 6 weeks.

³ Terminal reports are required for all inmates that successfully complete the RRC program, are sent back to the BOP, or escape. A terminal report was not required for one inmate in our sample because the inmate was still at the RRC during fieldwork.

Finally, the SOW requires inmates with a history of drug abuse, or who are suspected of illegal drug use, to be tested for illegal substances no less than four times per month. We found that not all mandatory drug tests were conducted for 2 inmates out of the 50 inmates who were required to be tested for illegal substances while at the RRC.

Based on the findings related to BOP Contract No. DJB200910, awarded to the Volunteers of America Texas, we made four recommendations to BOP to assist its management and oversight of the contract. These items are discussed in detail in the Findings and Recommendations section of the report. Our audit objectives, scope, and methodology appear in Appendix I.

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INTRODUCTION

The Office of the Inspector General (OIG), Audit Division, has completed an audit of the Federal Bureau of Prisons (BOP) Contract No. DJB200910, awarded to the Volunteers of America Texas. The purpose of the contract is to operate and manage the Residential Reentry Center (RRC) located in Hutchins, Texas (Hutchins RRC). A requirements contract was awarded for the Hutchins RRC on December 3, 2007, and as shown below, had an estimated award amount of over \$11 million for the base period and three option years. Actual costs for the base period and the first three option years (through December 31, 2012) were \$10,494,342.

EXHIBIT 1: CONTRACT PERIOD AND COSTS⁴

Contract Period	From	To	Estimated Cost	Actual Cost
Base Period	03/01/08	02/28/10	\$ 4,583,370	\$ 4,064,272
Option Year 1	03/01/10	02/28/11	\$ 2,357,207	\$ 2,034,605
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Total			\$ 11,875,840	\$ 10,494,342

Source: The contract and the list of contract-related expenditures

Background

The BOP was established in 1930 to provide more progressive and humane care for federal inmates, to professionalize the prison service, and to ensure consistent and centralized administration of the 11 federal prisons in operation at the time. Today, the BOP consists of 118 institutions, 6 regional offices, a Central Office, 2 staff training centers, and 22 residential reentry management offices.

The BOP is responsible for the custody and care of approximately 219,000 federal offenders. The BOP utilizes RRCs to transition inmates into communities prior to their release from incarceration. Inmates participating in release programming at RRCs remain in federal custody while serving the remainder of their sentences. At the same time, the inmates are allowed to work, visit with family members, and engage in a limited range of activities. According to the BOP, RRCs provide a structured, supervised environment, along with support in job placement, counseling, and other services to

⁴ Throughout this report, differences between the aggregated costs and totals are due to rounding.

facilitate successful reentry into the community after incarceration. Generally, the RRCs operate under a BOP issued Statement of Work (SOW).

On December 3, 2007, the BOP awarded the Volunteers of America Texas a requirements contract to operate an RRC in Hutchins, Texas. Hutchins, Texas is located in Dallas County, Texas, and services the Dallas metropolitan area. The Hutchins RRC is a 110-bed facility housing both male and female inmates. As shown in Exhibit 2, the BOP pays the contractor a per diem rate, which is the price per inmate, per day based on the actual inmate count at the Hutchins RRC.

EXHIBIT 2: PAYMENT RATE

Contract Period	Estimated Man-days	Per diem rate	Estimated Costs
Base Period (2 Years)			\$ 4,583,370
Option Year 1			\$ 2,357,207
Option Year 2			\$ 2,427,871
Option Year 3			\$ 2,507,393
Total			\$ 11,875,840

Source: The contract

OIG Audit Approach

The objective of our audit was to review performance in the following areas: (1) BOP monitoring activities, (2) RRC policies and procedures, (3) RRC personnel, (4) RRC resident accountability, (5) RRC programs and activities, (6) billings, and (7) BOP contract solicitation and award.

The results of our audit were based on interviews with essential personnel and documentation provided to us by both the BOP and the Hutchins RRC. Our review included reviewing inmate files at the Hutchins RRC, as well as the testing of accounting and billing records from the effective date of the contract, March 1, 2008, through July 31, 2012.

FINDINGS AND RECOMMENDATIONS

We found that for those items tested, the Hutchins RRC generally met the terms and conditions of the contract and followed applicable laws, regulations, and guidelines related to Contract No. DJB200910. However, the Hutchins RRC did not always comply with the criteria outlined in the BOP SOW for RRC operations. Specifically, the Hutchins RRC did not always complete inmates' Individualized Program Plans (IPPs), or update the IPPs in a timely manner. In addition, the Hutchins RRC did not always complete the required employment verification of inmates, or conduct them in a timely manner. We also found that release plans and terminal reports were not submitted timely for some inmates. Some inmates were missing release plans. Finally, we found that not all inmates were given mandatory drug testing. As a result, not all required inmate services were provided or provided timely. These issues, as well as other areas covered in our audit, are discussed in detail in the following sections.

Compliance with SOW Requirements

Inmate Individualized Program Plans

During an inmate's first 2 weeks at the RRC, the RRC must complete an Individualized Program Plan (IPP) that addresses all of the inmate's needs and includes a timetable for achievement of these goals. During our review of 51 inmate case files, we found that IPPs were missing for 4 inmates (8 percent). Three of these inmates were at the RRC between 26 and 59 days prior to their release. The fourth inmate was at the RRC for 19 days before escaping.

Additionally, these IPPs must be updated and signed by both the inmate and the inmate's case manager every 2 weeks. During our review of 51 inmate case files, we found the IPPs were not updated timely for 36 inmates. The updates for the IPPs which were not updated timely were between 1 and 33 days late. The number of late IPPs per inmate ranged from one to seven late IPPs.

We recommend that the Hutchins RRC comply with SOW requirements by ensuring that an IPP is completed for each inmate during their first 2 weeks at the RRC, and that the IPPs are updated every 2 weeks.

Inmate Employment

Inmates are expected to be employed 40 hours a week within 15 calendar days after their arrival at the RRC. For each job an inmate acquires, the RRC must verify employment by conducting an on-site visit during the first 7 calendar days. Thereafter, at least monthly, the RRC is required to contact the inmate's employment supervisor by phone or site visit to substantiate attendance and discuss any problems which may have arisen.

During our review of 51 inmate case files, we found that 35 inmates were employed while at the RRC. The required employment verifications were not conducted during the inmate's first week of employment for nine inmates (26 percent). Specifically, we found that initial employment verifications were not conducted within 7 calendar days for six inmates (17 percent), and missing initial employment verifications for an additional three inmates (9 percent). The initial employment verifications that were not conducted within 7 calendar days were between 2 and 108 days late. We also found that the required subsequent monthly employment verifications were not always conducted for 12 inmates. The number of missing subsequent monthly employment verifications per inmate ranged from one to four missing verifications.

We recommend that the Hutchins RRC comply with SOW requirements by ensuring that inmate employment is verified during the first 7 calendar days, and at least monthly thereafter.

Inmate Release

RRCs are required to submit a proposed release plan to the U.S. Probation Officer at least 6 weeks prior to the inmate's release date. The RRC must also complete a terminal report within 5 working days of an inmate's release. During our review of 51 inmate case files, we found that the release plans were not submitted timely to the U.S. Probation Officer for 7 inmates (21 percent) out of the 33 inmates who were required to have their release plans submitted at least 6 weeks prior to their release. We also found no release plans were submitted for an additional 2 inmates (5 percent) out of the 39 inmates for whom the RRC was required to complete a release plan.⁵ The release plans which were not submitted to the U.S. Probation Officer at least 6 weeks prior to an inmate's release were

⁵ A total of 39 inmates in our sample were required to have release plans. However, only 33 inmates were required to have a release plan sent to the U.S. Probation Officer at least 6 weeks prior to their release because the remaining 6 inmates were at the RRC for less than 6 weeks.

submitted between 2 to 6 weeks late. We found that terminal reports were not submitted timely for 13 inmates (26 percent) of the 50 inmates who were required to have terminal reports.⁶ The terminal reports that were not submitted to the BOP timely were between 3 and 66 days late. We found no instances of inmate case files missing terminal reports.

We recommend that the Hutchins RRC comply with SOW requirements by ensuring that inmate release plans are submitted to the U.S. Probation Officer timely, and that terminal reports are submitted to the BOP timely.

Inmate Drug Testing

An inmate known to have a history of drug abuse, or who is suspected of illegal drug use, must be tested for illegal substances no less than 4 times per month. During our review of the 51 inmate case files, we found that 50 inmates were required to be tested for illegal substances while at the RRC. Not all mandatory drug tests were conducted for two inmates. Of the two inmates, required drug tests were not conducted for 4 months for one inmate, while required drug tests for the other inmate were not conducted for 1 month.

We recommend that the Hutchins RRC comply with SOW requirements by ensuring that required drug testing is conducted at least four times per month for each inmate with a known history of drug abuse, or who is suspected of illegal drug use.

Employee Training and Background Checks

The BOP requires all RRC staff to obtain clearance before working with inmates. We reviewed a sample of 15 employee files, as well as the file of the RRC facility director. We found no instances of employees working with inmates prior to obtaining clearance.

The BOP requires all RRC staff to attend new employee training, as well as annual refresher training, to inform employees of the rules and regulations related to operating an RRC. We found no instances of employees not attending the required trainings.

⁶ Terminal reports are required for all inmates that successfully complete the RRC program, are sent back to the BOP, or escape. A terminal report was not required for one inmate in our sample because the inmate was still at the RRC during the time of fieldwork.

Inmate Arrival and Intake

Upon their arrival, inmates are required to be interviewed by RRC staff. In addition, the inmates are also required to sign: (1) an initial intake information form, (2) an acknowledgment of receipt of the RRC's disciplinary policies, and (3) a release of information consent form. Additionally, an acknowledgement of RRC rules and a subsistence agreement form must be completed and kept in the inmate's file. We selected a sample of 51 inmate files to review, and found no indication that arrival and intake interviews were not conducted or that required documentation was missing.

Inmate Security and Accountability

RRCs must be able to locate and verify the whereabouts of inmates at all times. RRCs must contact the inmate either by telephone or in-person at random times at work, at home, or at authorized destinations to maintain accountability. The RRC must conduct these checks at a frequency that ensures accountability and commensurate with the accountability risks of each individual inmate. RRCs can only authorize an inmate to leave the facility through sign-out procedures and only for an approved program activity. Approved program activities typically include job searches, employment, religious services, and visitations with family and friends. During authorized absences, the RRC is still responsible for inmate accountability.

Pursuant to the SOW, documentation of an inmate's movement in and out of RRCs must include, at a minimum: staff initials, the inmate's full name and register number, type of inmate, time out, destination, purpose, authorized return time, time in, and a section for special comments. Passes may be used by RRCs for approved inmate absences overnight and on weekends.

We examined the sign-out logs and passes for all 51 inmates in our sample, and discovered no instances of sign-out logs or passes being incomplete.

Billings and Invoices

According to Hutchins RRC officials, the RRC maintains its own internal database which lists all inmates housed at the RRC. RRC staff compare this list to one provided by the BOP each month. Any discrepancies are resolved before billing occurs. We compared the RRC billings with the BOP SENTRY

database for each month from March 1, 2008, through July 31, 2012, and found no discrepancies in the billings.⁷

Inmate Subsistence

To promote financial responsibility, the BOP requires inmates to make subsistence payments to RRCs each payday to help defray the cost of their confinement. Most inmates are required to pay 25 percent of their gross income. RRCs are responsible for collecting the full subsistence payments due. The RRCs are required to reduce the monthly billings to the BOP by the amount of subsistence payments collected.

Of the 35 inmates in our sample who were employed while at the RRC, we found 3 inmates for whom the RRC did not collect full subsistence. The total subsistence underpayment for these three inmates was \$38. We consider the amount of subsistence underpayments to be immaterial; therefore, we are not making any recommendations related to this issue.

Contract Solicitation and Award of Contract

On December 3, 2007, the BOP awarded a contract to the Volunteers of America Texas to provide community-based residential correctional services by operating the Hutchins RRC. These services include employment, inmate development, and other self-improvement opportunities to assist federal inmates during the transition from prison to the community.

The solicitation process used to acquire inmate residential reentry services for Hutchins, Texas, and the subsequent awarding of the contract to the Volunteers of America Texas was in accordance with the Federal Acquisition Regulation (FAR). The request for bids was advertised on FedBizOpps.gov as required, and the BOP officials properly received and evaluated bids in accordance with the FAR.

Monitoring

The BOP is required to conduct regular monitoring of all RRC contractors to ensure compliance with applicable laws, regulations, policies, contract requirements, and to ensure that fraud, waste, abuse, mismanagement, and illegal acts are prevented, detected, and reported.

⁷ Developed in-house beginning in the mid-1970s, SENTRY is used to collect, maintain, and report all inmate information that is critical to the safe and orderly operation of the BOP facilities.

These monitoring visits include pre-occupancy inspections, unannounced interim monitoring inspections, and annual full monitoring inspections.

We reviewed all 21 monitoring reports which occurred during the contract period. We found no instances of missing BOP monitoring inspections and that the BOP inspections correctly identified repeat deficiencies. We found that the Hutchins RRC took steps to address deficiencies identified by the BOP.

As a result of our findings, we made four recommendations to the BOP to assist its management and oversight of the contract.

Recommendations

We recommend that the BOP:

1. Ensure that an IPP is completed for each inmate during their first 2 weeks at the RRC, and that the IPPs are updated every 2 weeks.
2. Ensure that inmate employment is verified during the first 7 calendar days, and at least monthly thereafter.
3. Ensure that inmate release plans are submitted to the U.S. Probation Officer timely, and that terminal reports are submitted to the BOP timely.
4. Ensure that required drug testing is conducted at least four times per month for each inmate with a known history of drug abuse, or who is suspected of illegal drug use.

OBJECTIVES, SCOPE, AND METHODOLOGY

The objective of our audit was to review performance in the following areas: (1) BOP monitoring activities, (2) RRC policies and procedures, (3) RRC personnel, (4) RRC resident accountability, (5) RRC programs and activities, (6) billings, and (7) BOP contract solicitation and award.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Our audit concentrated on the inception of the contract on December 3, 2007, through July 31, 2012.

We performed sample testing on inmate case files and employee files. In this effort, we employed a judgmental sampling design to verify that SOW requirements were met for all files reviewed. We selected a sample of 51 inmate case files, as well as 16 employee case files, that were at the RRC during the contract period for Contract No. DJB200910. This non-statistical sample design does not allow projection of the test results to the universe from which the sample was selected.

We also reviewed all billing and invoice records from March 1, 2008, through July 31, 2012. Finally, we reviewed all BOP monitoring reports of the Hutchins RRC for the contract period.

In addition, we verified the Hutchins RRC invoice and payment records against BOP records to assess the accuracy of billings; however, we did not test the reliability of the financial management system as a whole. We determined that the contractor's records were sufficiently reliable to meet the objectives of this audit.

HUTCHINS RRC'S RESPONSE TO THE DRAFT REPORT



February 21, 2013

David M Sheeren
Regional Audit Manager
Denver Regional Audit Office
1120 Lincoln, Suite 1500
Denver, CO 80203

Dear Mr. Sheeren,

Attached is Volunteers of America Texas official response to the recommendations which resulted from the audit conducted by your office on our Residential Reentry Center (RRC) located in Hutchins, Texas.

It is the goal of the Hutchins RRC to provide services that are in accordance with the Statement of Work for Contract Number DJB20910. We are extremely pleased that the overall finding was "The Hutchins RRC generally met the Terms and Conditions of the Contract and followed applicable laws, regulations, and guidelines related to Contract Number DJB20910." We agree with the recommendations which address areas that were not found to be in compliance during this audit.

On behalf of myself, and the Hutchins facility staff, I would like to thank you and your staff for the professional way in which the audit was conducted.

Sincerely,

A handwritten signature in blue ink that reads "Melody Timinsky".

Melody Timinsky
President/CEO
Volunteers of America Texas

The following are Volunteers of America, Texas responses to the audit conducted on the RRC located at Hutchins for the period of March 1 2008 through July 31, 2012.

Recommendations:

1. All IPP's are being completed for each inmate in their first 2 weeks. To ensure this is occurring, all IPP's are being reviewed by the Assistant Director for compliance. All IPP's are being updated every 2 weeks in the Inmate's bi-weekly meeting with their case managers. All updates are being reviewed by the Assistant Director. This has been in place since September 2012.
2. The Employment Specialist was re-trained on the importance of verifying client's employment within 7 days, not 7 work days. This re-training took place in February 2013.
3. All release plans are being submitted to the Probation Department within 6 weeks of the inmate's release. Inmates are not allowed to change release plans in the last 6 weeks unless the plan was denied by Probation. Terminal Reports are being completed within 5 working days of clients' release. This is being tracked by the Assistant Facility Director.
4. Drug testing has been conducted 4 times per month for each inmate as verified by the monthly audits conducted by the Bureau of Prisons.

Again, Volunteers of America Texas strives to meet all aspects of the Statement of Work.

FEDERAL BUREAU OF PRISONS' RESPONSE TO THE DRAFT REPORT



U.S. Department of Justice

Federal Bureau of Prisons

Office of the Director

Washington, DC 20534

March 14, 2013

MEMORANDUM FOR DAVID SHEEREN
REGIONAL AUDIT MANAGER
OFFICE OF THE INSPECTOR GENERAL

A handwritten signature in black ink that reads "Charles E. Samuels, Jr.".

FROM: Charles E. Samuels, Jr., Director

SUBJECT: Response to the Office of Inspector General's (OIG)
Draft Report: Audit of the Federal Bureau of Prisons
Residential Reentry Center in Hutchins, Texas
Contract No. DJ200910

The Bureau of Prisons (BOP) appreciates the opportunity to respond to the open recommendations from the draft report entitled Audit of the Federal Bureau of Prisons Residential Reentry Center in Hutchins, Texas Contract No. DJ200910.

Please find the Bureau's response to the recommendations below:

Recommendation 1: "Ensuring that an IPP is completed for each inmate during their first 2 weeks at the RRC, and that the IPPs are updated every 2 weeks."

BOP's Response: The BOP concurs with the recommendation. Bureau staff conducts onsite inspections of this contract four times a year. One of these inspections is announced and the other three are unannounced. The monitoring staff will continue to ensure the "Statement of Work" requirements in this specific area is reviewed during each visit and the results are annotated on the monitoring report. The monitoring staff will follow-up with the contractor on

any deficiencies which are discovered. The Bureau requests this recommendation be closed.

Recommendation 2: "Ensuring that inmate employment is verified during the first 7 calendar days, and at least monthly thereafter."

BOP's Response: The BOP concurs with the recommendation. Bureau staff conducts onsite inspections of this contract four times a year. One of these inspections is announced and the other three are unannounced. The monitoring staff will continue to ensure the "Statement of Work" requirements in this specific area is reviewed during each visit and the results are annotated on the monitoring report. The monitoring staff will follow-up with the contractor on any deficiencies which are discovered. The Bureau requests this recommendation be closed.

Recommendation 3: "Ensuring that inmate release plans are submitted to the U.S. Probation Officer timely, and that terminal reports are submitted to the BOP timely."

BOP's Response: The BOP concurs with the recommendation. Bureau staff conducts onsite inspections of this contract four times a year. One of these inspections is announced and the other three are unannounced. The monitoring staff will continue to ensure the "Statement of Work" requirements in this specific area is reviewed during each visit and the results are annotated on the monitoring report. The monitoring staff will follow-up with the contractor on any deficiencies which are discovered. The Bureau requests this recommendation be closed.

Recommendation 4: "Ensuring that required drug testing is conducted at least four times per month for each inmate with a known history of drug abuse, or who is suspected of illegal drug use."

BOP's Response: The BOP concurs with the recommendation. Bureau staff conducts onsite inspections of this contract four times a year. One of these inspections is announced and the other three are unannounced. The monitoring staff will continue to ensure the "Statement of Work" requirements in this specific area is reviewed during each visit and the results are annotated on the monitoring report. In addition to the onsite monitorings, Residential Reentry staff will monitor the drug testing performed by the contractor on a monthly basis. The monitoring staff will follow-up with the contractor on any deficiencies which are discovered. The Bureau requests this recommendation be closed.

If you have any questions regarding this response, please contact Sara M. Revell, Assistant Director, Program Review Division, at (202) 353-2302.

**OFFICE OF THE INSPECTOR GENERAL
ANALYSIS AND SUMMARY OF ACTIONS
NECESSARY TO CLOSE THE REPORT**

The OIG provided a draft of this audit report to the BOP and the Hutchins RRC. The responses are incorporated into Appendices II and III of this final report. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

Recommendation Number

- 1. Resolved.** The BOP concurred with our recommendation that it ensure that an IPP is completed for each inmate during their first 2 weeks at the RRC, and that the IPPs are updated every 2 weeks. The BOP indicated that it will monitor this requirement during its four onsite inspections of the RRC each year.

In its response, the Hutchins RRC concurred with our recommendation and stated that IPPs are now being completed for each inmate in their first 2 weeks, and that IPPs are being updated every 2 weeks at the inmate's bi-weekly meeting with their case managers. To ensure this is occurring, the Hutchins RRC stated that since September 2012 all IPPs and bi-weekly updates are being reviewed by the Assistant Director for compliance.

This recommendation can be closed when we receive documentation supporting that the BOP has ensured that an IPP is completed for each inmate during their first 2 weeks at the RRC, and that the IPPs are updated every 2 weeks.

- 2. Resolved.** The BOP concurred with our recommendation that it ensure that inmate employment is verified during the first 7 calendar days, and at least monthly thereafter. The BOP indicated that it will monitor this requirement during its four onsite inspections of the RRC each year.

In its response, the Hutchins RRC concurred with our recommendation and stated that in February 2013 the Employment Specialist was re-trained on the importance of verifying an inmate's employment.

This recommendation can be closed when we receive documentation supporting that the BOP has ensured that inmate employment is verified during the first 7 calendar days, and at least monthly thereafter.

3. **Resolved.** The BOP concurred with our recommendation that it ensure that inmate release plans are submitted to the U.S. Probation Officer timely, and that terminal reports are submitted to the BOP timely. The BOP and indicated that it will monitor this requirement during its four onsite inspections of the RRC each year.

In its response, the Hutchins RRC concurred with our recommendation and stated that release plans and terminal reports are now being submitted timely, and being tracked by the Assistant Facility Director.

This recommendation can be closed when we receive documentation supporting that the BOP has ensured that inmate release plans are submitted to the U.S. Probation Officer timely, and that terminal reports are submitted to the BOP timely.

4. **Resolved.** The BOP concurred with our recommendation that it ensure that the required drug testing is conducted at least four times per month for each inmate with a known history of drug abuse, or who is suspected of illegal drug use. The BOP indicated it will monitor this requirement during its four onsite inspections of the RRC each year.

In its response, the Hutchins RRC concurred with our recommendation and stated that drug testing is now being conducted four times per month for each inmate.

This recommendation can be closed when we receive documentation supporting that the BOP has ensured that the required drug testing is conducted at least four times per month for each inmate with a known history of drug abuse, or who is suspected of illegal drug use.