



THE FEDERAL BUREAU OF PRISONS' WITNESS SECURITY PROGRAM

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**THE FEDERAL BUREAU OF PRISONS’
WITNESS SECURITY PROGRAM***

EXECUTIVE SUMMARY

The Witness Security Program (WITSEC) provides for the protection of federal witnesses who agree to testify against drug traffickers, terrorists, members of organized crime enterprises, and other major criminals. The Federal Bureau of Prisons (BOP) is one of three Department of Justice (DOJ) components involved in the WITSEC Program.¹ The BOP’s role arises when a witness is admitted to the program upon incarceration or while incarcerated in the BOP. The BOP’s primary responsibility under the program is to provide for the safety of witnesses participating in the program during their incarceration.

At the time of our fieldwork, there were approximately 500 WITSEC inmates in BOP custody. While this represents less than 1 percent of the BOP’s overall inmate population, providing for the security of these inmates presents challenges. As with all federal inmates, the BOP must maintain secure custody of WITSEC inmates. In addition, the BOP must protect WITSEC inmates from the risk of harm relating to their status as witnesses in criminal prosecutions. Those risks come from sources both within BOP facilities and external to them.

The BOP’s WITSEC program is managed by the Inmate Monitoring Section (IMS), which monitors and controls most aspects of a WITSEC inmate’s confinement. IMS reviews the background of and information about each prospective WITSEC inmate, accounting for the inmate’s offense as well as his safety risk in determining the BOP

* The full version of this Executive Summary includes information that the Federal Bureau of Prisons (BOP), the Criminal Division’s Office of Enforcement Operations (OEO), and the Office of the Inspector General (OIG) considered to be law enforcement sensitive and therefore could not be publicly released. To create this public version of the Executive Summary, the OIG redacted (deleted) portions of the Executive Summary that were considered sensitive by the BOP, OEO, and OIG and indicated where those redactions were made.

¹ Two other DOJ entities are involved in the program. OEO oversees the entire Witness Security Program, including the admission of individuals into the program. In addition, the United States Marshals Service (USMS) protects all witnesses who are relocated into the community and also transports all witnesses, including inmates who need to be protected in a “danger area,” where the protected witness may be at risk for physical harm.

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facility at which the inmate should be housed. IMS also acts as a liaison for communications between WITSEC inmates and BOP housing unit staff, and between the inmates and outside parties such as the Office of Enforcement Operations (OEO), U.S. Attorneys Offices, and the U.S. Marshals Service (USMS).

[SENSITIVE INFORMATION REDACTED] the BOP's WITSEC inmates are housed in 1 of 7 Protective Custody Units (PCU) located in BOP facilities throughout the country. Although located within BOP institutions housing non-WITSEC inmates, the PCUs are separate facilities, each of which houses only WITSEC inmates. [SENSITIVE INFORMATION REDACTED]

Audit Approach

The Office of the Inspector General (OIG) initiated this audit to determine whether the BOP is ensuring the safety of WITSEC inmates in its custody. In our audit we examined the physical safety and security of WITSEC inmates, the general security environment within the BOP's facilities housing WITSEC inmates, and other BOP systems and processes relating to the program for incarcerated witnesses.

Specifically, we reviewed the processes for managing the incarceration of WITSEC inmates; designating the institutions where WITSEC inmates serve their sentences; providing services such as mail, telephone contact, and visitation in a secure manner; maintaining security over WITSEC information; and staffing facilities where WITSEC inmates are housed.

We conducted our audit work at BOP headquarters in Washington, D.C., four PCUs, [SENSITIVE INFORMATION REDACTED]. We interviewed BOP officials, evaluated policies and procedures, and reviewed a random sampling of WITSEC inmate files.

We also distributed questionnaires to all WITSEC inmates housed in PCUs to determine their level of satisfaction with the WITSEC program and the services provided at BOP facilities.² Appendix I contains a more detailed description of our audit objectives, scope, and methodology.

² [SENSITIVE INFORMATION REDACTED]. Appendices III through V provide more information on our questionnaire and the responses that we received.

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Results in Brief

Safety and Security

Our audit found that the BOP was providing a secure environment for WITSEC inmates. We believe this is largely due to the BOP's system of [SENSITIVE INFORMATION REDACTED], and the BOP's attention to housing assignments.

However, we identified areas where we believe the BOP could make improvements in its WITSEC program. Specifically, the BOP is not entering into its SENTRY database all individuals who pose a security risk to WITSEC inmates.³ We found that at least 120 individuals identified as potential threats to WITSEC inmates were not entered into SENTRY because of the BOP's policy that complete identifying information is needed before a record can be added to SENTRY. [SENSITIVE INFORMATION REDACTED].

Enhanced background investigations for BOP employees who interact with WITSEC inmates on a daily basis or have access to WITSEC inmate information is another area that could be improved. We found that, while IMS headquarters staff and select staff at the Designation and Sentence Computation Center are required to maintain a Top Secret security clearance, other BOP employees with access to WITSEC inmates and WITSEC inmate information generally undergo only basic background checks. Although we do not believe that all BOP employees who interact with WITSEC inmates or have access to information about WITSEC inmates need a Top Secret clearance, requiring a more thorough background check for those employees would provide greater security for the inmates. In addition, our audit found that the BOP does not require employees who knowingly have access to WITSEC inmates and information to sign a secrecy agreement. This requirement would be an important internal control to ensure BOP staff with WITSEC responsibilities are aware of the need to safeguard WITSEC inmate information. [SENSITIVE INFORMATION REDACTED].

Since fiscal year (FY) 1982, 20 inmates have died while participating in the WITSEC program. Although records indicate that

³ SENTRY is the primary information system used by the BOP to manage its inmate population. SENTRY is used at all BOP locations, including headquarters, field offices, regional offices, and correctional facilities. SENTRY contains basic biographical information, as well as records of incident reports, disciplinary actions, housing history, educational information, and sentence computations.

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most died from natural causes or illness, and not as a result of homicide, death certificates showing cause of death were on file for only 12 of the deceased inmates. The absence of death certificates for the other 8 inmates was of concern in that it creates some uncertainty about whether the deaths were related to the inmates' participation in the program. Moreover, we noted that two of the deceased inmates committed suicide. While an autopsy report confirmed that one of the deaths was, in fact, a suicide, the lack of an autopsy report in the other inmate's file raised questions as to whether the death was confirmed as a suicide. BOP policy states that the Warden may order an autopsy on the body of a deceased inmate, but one is not required. This is further supported by 18 U.S.C. §4045 and BOP policy, which afford the chief executive officer of a BOP correctional facility the discretion to order an autopsy under certain circumstances. In our opinion, it would be in the Department's best interest to have an autopsy performed whenever a WITSEC inmate dies by homicide, suicide, accident, or unknown causes, and for IMS to maintain copies of those autopsy reports along with copies of death certificates for all WITSEC inmates who die in BOP custody. However, if a Warden decides not to order an autopsy to be performed, then we believe that the Warden's decision and justification should be documented.

WITSEC Services

According to BOP policy, PCUs "must provide [WITSEC inmates] with adequate programs and services to promote constructive use of time." We found that the BOP provides educational, medical, employment, library, and other services at each of the PCUs. However, the results of our inmate survey revealed a large degree of dissatisfaction among the respondents in several areas, particularly the intake process and the limited availability of certain services.⁴ Nearly half of those responding complained about receiving incomplete and inaccurate information about the WITSEC program during the intake process before they had agreed to participate. We also noted the high degree of dissatisfaction with medical services, substance abuse counseling, educational services, and employment training available at the PCUs. In addition, the survey responses included complaints about a lengthy approval process for WITSEC inmates to make telephone calls and receive visitors. Further, we learned that

⁴ It should be noted that inmate responses and criticisms of the WITSEC program may not necessarily be targeted toward the BOP. As previously stated, the USMS and the Criminal Division's OEO also play important roles in the Witness Security Program.

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non-PCU staff were monitoring the telephone calls of WITSEC inmates located in PCUs. We believe this elevates the security risk for these inmates and therefore, these telephone calls should only be monitored by PCU staff.

Program Statistics and Oversight

The BOP's IMS does not currently accumulate statistical data on WITSEC activity in several key areas, including the number of WITSEC inmates terminated from the program, the number of WITSEC inmates released from the BOP, and the number of those released inmates who transferred into the USMS's Witness Security Program for post-release services. In addition, the BOP does not separately budget or account for the operating costs of the PCUs. Without this basic program and budgetary information, BOP management cannot make fully informed decisions on how its WITSEC program affects the BOP's resources.

In this report, we make 18 recommendations to assist the BOP in managing its WITSEC program. Our recommendations include: (1) entering available identifying information into SENTRY on individuals that may pose a safety risk to WITSEC inmates; (2) [SENSITIVE INFORMATION REDACTED]; (3) requiring BOP staff who knowingly work with or handle WITSEC inmates and related information to sign secrecy agreements; (4) reviewing the policies and procedures relating to inmate services provided in the PCUs to address the high level of dissatisfaction expressed by WITSEC inmates in their survey responses; and (5) developing a method to accumulate and analyze data on program activities, including newly designated WITSEC inmates, terminated WITSEC inmates, reasons for termination, and WITSEC inmate injuries.

Our report contains detailed information on the full results of our review of the BOP WITSEC program. The remaining sections of this Executive Summary summarize in more detail our audit findings.

Safety and Security of WITSEC Inmates

Based on the results of our audit, we concluded that the BOP is providing adequate security for its WITSEC participants. In the last 26 years, we found no instance of death by homicide to WITSEC inmates as a result of their participation in the

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WITSEC program.⁵ In addition, we found that none of the inmates who responded to our survey were physically harmed while in BOP custody as a result of their participation in the program. Further, over 80 percent of WITSEC inmates who responded to our survey indicated that they felt safe in the WITSEC program. However, our audit disclosed some areas of concern with regard to WITSEC inmate safety and security.

Housing Assignments

A critical factor in creating a secure environment for WITSEC inmates is their housing assignment. [SENSITIVE INFORMATION REDACTED]. Housing protected inmates separate from the general prison population lowers the probability of harm to the inmate. Even within the PCUs, the BOP must be careful not to house WITSEC inmates with other protected inmates who may harm them, and also must not house inmates at a PCU within a facility housing inmates in the general population who pose a risk. The BOP has a procedure of identifying other inmates who pose a threat to WITSEC inmates and, therefore, should be housed separate from those inmates. These individuals are referred to as "separatees." The BOP's SENTRY database is the primary mechanism for tracking separatees. Before the BOP makes a decision on where to house a WITSEC inmate, it searches SENTRY to avoid placing a WITSEC inmate in close proximity to a separatee. This procedure has worked well for the BOP in that we did not find any instance of WITSEC inmates who responded to our survey as being harmed as result of their participation in the WITSEC program.

However, in our review of the case files for a sample of 47 WITSEC inmates, we identified at least 120 individuals who posed a threat to 23 WITSEC inmates but were not entered into SENTRY as separatees. These individuals were not entered into SENTRY because BOP did not have sufficient identifying information to complete the entry for each person.⁶ If the BOP does not have sufficient identifying

⁵ As we describe later in this report, since FY 1982, 20 WITSEC inmates died while in BOP custody. We found that their deaths were unrelated to their participation in the WITSEC program.

⁶ According to IMS officials, when entering an individual into SENTRY, the following information should be captured: full name, race, sex, date of birth, Hispanic or non-Hispanic, birth place (state or country), citizenship, city and state of residence (or country of residence), height and weight, hair color, eye color, and either an FBI number, a social security number, an alien registration number, or a state identification number.

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information for a separatee, it is not able to input the information into SENTRY and instead, maintains the available information in a central paper file at IMS. The resulting risk of not including these individuals in SENTRY is that IMS personnel may be making decisions regarding housing assignments without considering all relevant information available and thereby increasing the risk that a WITSEC inmate may be housed together with someone who poses a risk. We believe that BOP should consider allowing partial entry of information on separatees into SENTRY. Also, we believe that BOP should conduct periodic reviews of WITSEC inmate paper records and SENTRY to ensure that information on separatees is current and complete.

WITSEC Escorts

When WITSEC inmates leave their housing units for a court appearance, another prison institution, or for medical services, their safety during transport and while away from the institution is the responsibility of their escorts. The USMS and BOP share responsibility for transporting and escorting WITSEC inmates. The USMS is responsible for transporting WITSEC inmates to the BOP facility where they are initially designated to serve their sentences in the program, to court appearances, neutral site visits, and for post-release services.⁷ The BOP is responsible for all other movements, such as transfers within the BOP system and transportation for medical treatment.

To ensure the safety of WITSEC inmates during movements, the BOP developed and implemented the WITSEC Escort Training Program to provide BOP staff with specialized training for escorting WITSEC inmates. In addition to providing protection for the inmates, WITSEC Escorts also file trip reports with IMS for each transport. In reviewing the WITSEC Escort program, we found it to provide a level of security for WITSEC inmates that is appropriate to their greater vulnerability when outside the PCU.

[SENSITIVE INFORMATION REDACTED].

⁷ Neutral site visits are meetings between witnesses, in this case, WITSEC inmates, and case agents or prosecutors to prepare for testimony or court appearances.

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We attempted to examine WITSEC inmate movements more closely and requested from IMS information on the number of movements conducted by WITSEC Escorts. We were told that this information was not tracked and could not be provided. However, IMS's current assistant administrator did provide to us a total of 35 trip reports that he maintained from the period of July 2006 to June 2007. We found no incidents of injury or security breaches. Because IMS did not maintain a master list of all movements, we could not determine whether all trip reports were on file or whether there were any incidents or security breaches related to the trips we did not review.

Physical Access to PCUs

We also reviewed the physical access into PCUs. We found that each PCU has its own separate control room that regulates all entry into the unit. Entry is only permitted to individuals on a list of those authorized to have access to the PCU. The Warden of each institution determines which BOP staff and contractors, such as outside vendors and clergy, are permitted into the PCU.

BOP staff is subjected to a basic background check before being employed, and background checks are updated every 5 years. [SENSITIVE INFORMATION REDACTED].⁸ We believe this to be an internal control weakness that heightens WITSEC inmates' vulnerability to individuals with whom they should not have contact.

[SENSITIVE INFORMATION REDACTED]. Specifically, IMS maintains each WITSEC inmate's case file, which includes separatee data. This information could be reviewed to determine whether certain individuals pose a security risk to a WITSEC inmate – something that a basic background check [SENSITIVE INFORMATION REDACTED] [is] less likely to identify.

Access to WITSEC Inmate Information

[SENSITIVE INFORMATION REDACTED].⁹ [SENSITIVE INFORMATION REDACTED].¹⁰

⁸ [SENSITIVE INFORMATION REDACTED].

⁹ An institution's locator center receives telephone calls from the public requesting an inmate's location and related information. [SENSITIVE INFORMATION REDACTED].

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[SENSITIVE INFORMATION REDACTED].

Security Clearances of BOP Staff

BOP staff assigned to a PCU are in daily contact with WITSEC inmates, and in most cases have knowledge about the inmates, their families, their former associations, their crimes, and the type of testimony they provided.¹¹ Additionally, WITSEC case files maintained at the PCUs contain very sensitive information, including the names of persons who have been determined to represent a threat to a WITSEC inmate, the nature of an inmate's testimony, the names and addresses of visitors, and the telephone numbers of family members and associates.

While IMS staff at BOP headquarters are subject to Top Secret security clearance investigations, BOP employees stationed at the PCUs are subjected to a basic background investigation. The basic background investigations are less thorough than a Top Secret security clearance investigation and as a result may not expose security risks and vulnerabilities of the individuals who are entrusted with sensitive WITSEC information. We believe that requiring only the basic background investigation for staff assigned to PCUs is an internal control weakness. Although we do not believe that all BOP employees who interact with WITSEC inmates or have access to information about WITSEC inmates require a Top Secret clearance, requiring a more thorough background check than is currently afforded for those employees would provide greater security for the inmates.

We asked a BOP headquarters official why BOP staff at the institutions who have access to WITSEC information were not required to have the same level of security clearance as IMS staff. The official told us that the greater clearance was unnecessary because PCU staff only have access to those inmates housed within their PCU, not the entire WITSEC population. We did not consider that to be a sufficient distinction to justify a lower level background investigation for BOP staff working at the PCUs. The fact that PCU staff members have

¹⁰ [SENSITIVE INFORMATION REDACTED].

¹¹ Each PCU is staffed with the following personnel: (1) unit manager, (2) case manager, (3) correctional counselor, and (4) unit secretary. In addition to these staff members, correctional officers are assigned to staff the PCU on a rotating basis every 3 months. Other BOP staff provide routine food services, medical services, education, and work oversight.

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access to information on only a portion of the WITSEC population does not mitigate the risks associated with potential unauthorized disclosures. Further, over the course of their incarceration, WITSEC inmates are likely to be housed in several PCUs for medical or security reasons, thereby increasing PCU staff members' exposure to the WITSEC inmate population. Finally, PCU staff may become aware of other WITSEC inmates not housed in their own PCUs because of their access to inmate files or their interaction with inmates, in addition to discussions with IMS personnel. We believe a more thorough background check for BOP employees whose primary responsibilities include working with WITSEC inmates and having access to WITSEC information would provide greater security for the inmates.

WITSEC Secrecy Agreement

Because information about the WITSEC program and its participants is highly sensitive, the BOP has policies that generally prohibit unauthorized access to BOP records and documents as well as the unauthorized disclosure of official BOP information. Other than these policies, we found no requirement for a specific secrecy agreement between the BOP and its employees related to protecting WITSEC program information. While federal statutes and Attorney General orders provide clear restrictions and penalties for the unauthorized disclosure of WITSEC information, these WITSEC-specific restrictions are not reflected in the BOP's general policies.¹²

We believe that a separate WITSEC-specific secrecy agreement between the BOP and its employees who knowingly work with WITSEC inmates or handle WITSEC information is an important internal control that the BOP should consider establishing. This internal control would provide WITSEC program managers greater assurance that BOP staff is aware of the requirement to safeguard WITSEC information. It would also impress upon the staff the seriousness of their responsibilities by alerting them to the consequences of improperly disclosing WITSEC information.

Death Certificates and Autopsies

Although we did not find instances of WITSEC inmates being harmed as a result of their participation in the program, 20 WITSEC

¹² See 18 U.S.C. § 3521; Attorney General Order 2511-2001 and Attorney General Order 2199-98.

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inmates have died in BOP custody since FY 1982. Based on our review of various documents, e-mails, and memoranda contained in the inmate files, it appears that 18 inmates died from various illnesses. Two of the deaths were apparent suicides.

We found death certificates for only 12 of the 20 deceased inmates; the files for the remaining 8 deceased WITSEC inmates did not contain death certificates. Given the sensitivity of the WITSEC program and the significance of inmate security and safety to its success, we recommend that the BOP ensure that the cause of death is adequately supported by official documentation, such as a death certificate, and that IMS maintain these documents for all WITSEC inmates who die while in BOP custody.

In addition, we noted that one of the two WITSEC inmates who committed suicide had evidence in his case file that an autopsy was performed and the autopsy report confirmed that the cause of death was suicide. However, we did not find evidence that an autopsy was conducted in the case of the other suicide. BOP policy does not require an autopsy for every inmate death. Rather, the Warden has discretion to decide whether an autopsy should be conducted. Considering the sensitivity of the WITSEC program and the federal government's interest in maintaining the safety and security of protected witnesses, we believe that the BOP's policy governing autopsies should be strengthened so as to make autopsies presumptive when a WITSEC inmate dies due to homicide, suicide, accident, or any other circumstance where the cause of death may be open to dispute. Pursuant to both 18 U.S.C. § 4045 and BOP policy, the chief executive officer of a BOP correctional facility may order an autopsy in the event of an inmate homicide, suicide, accident, or unexplained death under certain delineated circumstances, including when "necessary to detect a crime, . . . remedy official misconduct, or defend the United States or its employees from civil liability."

Current BOP policy leaves the determination regarding whether an autopsy is necessary for any of these reasons solely to the local Warden's discretion. We believe that in the case of WITSEC inmates who die under such circumstances, it would be the extremely rare case that an autopsy would not be "necessary" within the meaning of the statute and regulation. Accordingly, we recommend that BOP revise its policy to require a Warden who declines to order an autopsy under such circumstances to prepare a written justification explaining the reasons for the declination. In addition, we recommend

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that copies of the death certificate and either the autopsy report or the written justification for the declination be maintained in IMS's files.

WITSEC Services

BOP policy requires PCUs to provide WITSEC inmates with access to adequate programs and services during their incarceration. This includes basic services such as health care, telephone, and mail services, as well as educational, vocational, and counseling programs that help inmates to make constructive use of their time in prison.

To assess the BOP's efforts in providing inmates access to these services, programs, and activities, we designed a detailed questionnaire and provided it as a confidential correspondence to each of the [SENSITIVE INFORMATION REDACTED] WITSEC inmates housed in the 7 PCUs. [SENSITIVE INFORMATION REDACTED].

[SENSITIVE INFORMATION REDACTED], we received 330 [SENSITIVE INFORMATION REDACTED] completed questionnaires. Our analysis of the survey results indicated a high degree of dissatisfaction among the respondents due to the limited availability of some programs and services. This included limited access to substance abuse counseling, educational programs, and employment training. In addition, inmates complained of the lengthy approval processes for clearance of telephone numbers for calls made by the inmates and for receiving visitors, and for the general restrictions of the program, such as housing limitations.

Telephone Services

Of the 330 WITSEC inmates who completed our questionnaire, 322 responded to the question regarding the inmate's experience with telephone services. Of those 322 WITSEC inmates who responded to the question, 57 percent stated they had encountered problems, while 43 percent stated they had not. The majority of the respondents identified the length of time it took to obtain approval for the inmate to call a requested telephone number as the primary problem with several inmates complaining of delays of up to 9 months for the approval of their telephone numbers. As of August 2008, the approval process for adding telephone numbers to an inmate's contact list requires the joint approval of IMS, OEO (which is located in the Criminal Division) and the Assistant U.S. Attorney involved in the case.

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Visitation Services

Of the 330 WITSEC inmates who completed our questionnaire, 301 responded to our question concerning visitation services. Of those 301, 111 (37 percent) respondents stated they had experienced some problem with visitation. As with telephone services, the main concern cited was the lengthy process for approval of prospective visitors.

A few respondents noted security concerns regarding visitation to the PCU [SENSITIVE INFORMATION REDACTED]. Specifically, the inmates noted that visitors for WITSEC inmates [SENSITIVE INFORMATION REDACTED] were required to wait together with visitors for non-WITSEC inmates housed in the institution's general population. This situation appears to be a result of the physical structure of the facility. Nevertheless, the mingling of WITSEC-related visitors with other visitors represents a control weakness that could jeopardize the security of WITSEC inmates and their visitors.

Medical and Health Services

Of the 330 WITSEC inmates who completed our questionnaire, 220 (66 percent) expressed some level of dissatisfaction with the medical and health services they received. Most of those responding cited the length of time it takes to receive medical treatment or medicine, and extended delays in obtaining dental treatment.

In addition, approximately 39 percent (129) of the survey respondents described themselves as "dissatisfied," "very dissatisfied," or both, with the available substance abuse counseling. The survey requested that respondents who were "dissatisfied" or "very dissatisfied" with substance abuse counseling and programs provide further comment. We received comments from 38 inmates, nearly all of whom stated that the substance abuse programs and counseling were very limited or non-existent within PCUs.

Employment and Trade Skills Programs

The survey results showed a high level of dissatisfaction with access to and quality of employment training and trade skill programs for WITSEC inmates. Of the 330 WITSEC inmates who completed our questionnaire, 206 (62 percent) expressed some level of dissatisfaction with their access to employment and trade skill programs. Additionally, 218 (66 percent) expressed dissatisfaction with the *quality* of those programs. The majority of respondents

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stated that trade skill development or vocational programs were virtually non-existent within PCUs. Meaningful employment training or trade skills development for inmates housed within PCUs can decrease the amount that the Justice Department will have to spend on these inmates if they are relocated upon release from BOP custody.

WITSEC Program Statistics and Oversight

The BOP, in coordination with OEO, has several stages of oversight for reviewing the WITSEC program. OEO conducts regular visits to the PCUs and provides WITSEC inmates with a forum for regular communication. In addition, BOP staff also visit the PCUs on a regular basis, often accompanying OEO staff. IMS and OEO also provide WITSEC inmates with a channel of communication by maintaining "Open House" hours in which inmates can call IMS or OEO to discuss any concerns or issues they may have. These calls are provided to WITSEC inmates at no cost and allow a consistent opportunity for communication. IMS also conducts program reviews at each PCU every 2 years to determine whether PCUs are in compliance with BOP policies and procedures. The majority of WITSEC inmates surveyed responded positively to questions about BOP management's responsiveness to program issues raised by the inmates, evidencing the effectiveness of the BOP's oversight of the program.

With regard to financial management of the program, we found that the BOP did not track basic program and cost data on its WITSEC operations. Without this information, the BOP cannot compare and assess the financial aspects of the program on a periodic basis and cannot project budget needs and the budgetary impact of changes to the program. As a result, BOP management lacks information that could be useful in assessing the overall effectiveness of its program.

Conclusion and Recommendations

Our audit found that no WITSEC inmate has suffered injury or death while in BOP custody because of their participation in the WITSEC program, which is a positive record for the WITSEC program.

We identified several areas in which improvements could be made to reduce the risk of harm to WITSEC inmates, including: (1) BOP policies and procedures requiring complete information about persons who should be housed separately and otherwise separated from a WITSEC inmate before such persons can be identified in SENTRY as a "separatee"; (2) [SENSITIVE INFORMATION REDACTED];

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(3) [SENSITIVE INFORMATION REDACTED]; (4) [SENSITIVE INFORMATION REDACTED]; (5) subjecting BOP staff who have access to sensitive WITSEC information only to a basic background investigation; and (6) the absence of a requirement that all BOP staff knowingly having access to WITSEC inmates and information enter into secrecy agreements for such information.

We also found some weaknesses in the BOP's documentation of WITSEC inmates who die in its custody. The lack of death certificates for all deceased WITSEC inmates' files leaves the BOP vulnerable to questions about the cause of death. The lack of an autopsy can leave the BOP vulnerable to questions about the cause of death if a WITSEC inmate is killed, commits suicide, has a fatal accident, or dies unexplainably.

Our audit also found that basic services and programs are being provided to WITSEC inmates in BOP custody. However, we found dissatisfaction among WITSEC inmates who we surveyed regarding the lengthy approval process for telephone and visitation privileges, medical and health services (in particular substance abuse counseling), and employment and trade skill development programs. We believe the BOP should examine the adequacy of these programs, and also clearly explain to inmates the limitations of the WITSEC program prior to inmates agreeing to participate in the program.

We also found that the BOP has an effective system of internal reviews and reporting processes designed to inform WITSEC managers on how the program is operating within the BOP. Yet, the BOP was not able to quantify how much it is spending on the WITSEC program. Basic financial and statistical information can help the BOP more effectively manage the WITSEC program.

As a result of our audit work, we provide 18 recommendations to assist the BOP in strengthening the management of its WITSEC program. Among our recommendations are for the BOP to enter individuals with partial identifying information into the SENTRY database so that BOP staff is better informed of individuals who pose a security risk to WITSEC inmates. [SENSITIVE INFORMATION REDACTED]. Further, we recommended that the BOP consider the results of our survey of the WITSEC inmates in assessing its programs and services offered to WITSEC inmates located in PCUs. The BOP should also maintain financial and statistical information on its WITSEC program.