

**OIG ANALYSIS OF BOP'S RESPONSE**

OIG provided a draft of this report to BOP for its comment. BOP's response is included in Appendix 3 to this report. OIG's analysis of BOP's response and the actions necessary to close the recommendations are discussed below. Please provide a status update on the 10 recommendations by December 31, 2018.

**Recommendation 1:** Fully implement ongoing plans to create a permanent program review for the Female Offender Manual that includes in-person visits and an institution-specific rating.

**Status:** Resolved.

**BOP Response:** BOP concurred with the recommendation and stated that it would fully implement ongoing plans to create a permanent program review for the Female Offender Manual that includes in-person visits and an institution-specific rating.

**OIG Analysis:** BOP's planned actions are responsive to our recommendation. Please provide a copy of program review guidelines for the Female Offender Manual that include in-person visits and an institution-specific rating, as well as a schedule of Female Offender Manual program reviews by institution for calendar year 2019.

**Recommendation 2:** Determine the appropriate level of staffing that should be allocated to the Women and Special Populations Branch based on an analysis of its broad mission and responsibilities.

**Status:** Resolved.

**BOP Response:** BOP concurred with the recommendation and stated that it would determine the appropriate level of staffing that should be allocated to the Women and Special Populations Branch based on an analysis of its broad mission and responsibilities.

**OIG Analysis:** BOP's planned actions are responsive to our recommendation. Please provide a copy of the analysis BOP performed of the branch's mission and responsibilities, including a conclusion about the appropriate staffing level for the work identified.

**Recommendation 3:** Ensure that all officials who enter into National Executive Staff positions have taken appropriate, current training specific to the unique needs of female inmates and trauma-informed correctional care.

**Status:** Resolved.

**BOP Response:** BOP concurred with the recommendation and stated that it would ensure that all officials who enter into National Executive Staff positions have

taken appropriate, current training specific to the unique needs of female inmates and trauma-informed correctional care.

**OIG Analysis:** BOP's planned actions are responsive to our recommendation. Please provide an update to the Bureau Mandatory Training Standards or other relevant policy showing how BOP will ensure that all officials entering into National Executive Staff positions have taken BOP's current training specific to the unique needs of female inmates and trauma-informed correctional care.

**Recommendation 4:** Identify ways to expand the staffing of the Resolve program.

**Status:** Resolved.

**BOP Response:** BOP concurred with the recommendation and stated that it would identify ways to expand the staffing of the Resolve program.

**OIG Analysis:** BOP's planned actions are responsive to our recommendation. Please provide OIG with a copy of BOP's analysis of the Resolve program's staffing needs and the option BOP selected.

**Recommendation 5:** Improve the communication of its pregnancy program availability and eligibility criteria to relevant staff and pregnant inmates to ensure consistent understanding across BOP institutions.

**Status:** Resolved.

**BOP Response:** BOP concurred with the recommendation and stated that it would improve the communication of its pregnancy program availability and eligibility criteria to relevant staff and pregnant inmates to ensure consistent understanding across BOP institutions.

**OIG Analysis:** BOP's planned actions are responsive to our recommendation. Please provide a copy of any notices, operations memoranda, program statements, or other written materials used to communicate information about pregnancy program availability and eligibility criteria to inmates and institution staff. Please also include a description of how the materials were disseminated and a list of the institutions and position titles of the addressees who received them.

**Recommendation 6:** Improve data tracking to allow it to more easily identify inmates who are aware of, interested in, eligible for, or participating in pregnancy programs, as well as to assess barriers to participation.

**Status:** Resolved.

**BOP Response:** BOP concurred with the recommendation and stated that it would improve data tracking to allow it to more easily identify inmates who are

aware of, interested in, eligible for, or participating in pregnancy programs, as well as to assess barriers to participation.

**OIG Analysis:** BOP's planned actions are responsive to our recommendation. Please describe how BOP intends to track pregnant inmates to more easily identify inmate awareness of, interest in, eligibility for, participation in, and barriers to participation in BOP's two pregnancy programs.

**Recommendation 7:** Clarify guidance on the distribution of feminine hygiene products to ensure sufficient access to the amount of products inmates need free of charge.

**Status:** Resolved.

**BOP Response:** BOP concurred with the recommendation and stated that it would clarify guidance on the distribution of feminine hygiene products to ensure sufficient access to the amount of products inmates need free of charge.

**OIG Analysis:** BOP's planned actions are responsive to our recommendation. Please provide a copy of BOP policy clarifying that female inmates should have sufficient access to the amount of feminine hygiene products they need, free of charge, and a description of how the policy was disseminated, including a list of the institutions and position titles of the addressees who received it.

**Recommendation 8:** Improve the availability of female staff at locations in female institutions where inmate searches are common, through the establishment of gender-specific posts or other methods.

**Status:** Resolved.

**BOP Response:** BOP concurred with the recommendation and stated that it would improve the availability of female staff at locations in female institutions where inmate searches are common, through the establishment of gender-specific posts or other methods.

**OIG Analysis:** BOP's planned actions are responsive to our recommendation. Please describe the method BOP selected to improve the availability of female staff at locations in female institutions where inmate searches are common.

**Recommendation 9:** Establish policy that determines how long sentenced inmates can be confined in a detention center, or ensures that the conditions of confinement and inmate programming at a detention center more closely approximate those of a non-detention center when sentenced inmates are housed there.

**Status:** Resolved.

**BOP Response:** BOP concurred with the recommendation and stated that it would establish policy that determines how long sentenced inmates can be confined

in a detention center, or ensures that the conditions of confinement and inmate programming at a detention center more closely approximate those of a non-detention center when sentenced inmates are housed there.

**OIG Analysis:** BOP's planned actions are responsive to our recommendation. Please provide a copy of BOP policy that defines the length of time sentenced inmates can be confined in a detention center or describe how BOP would ensure that the conditions of confinement and inmate programming at detention centers more closely approximates those of a non-detention center when sentenced inmates are housed there.

**Recommendation 10:** Explore options to procure female Special Housing Unit space closer to Federal Correctional Institution Danbury.

**Status:** Resolved.

**BOP Response:** BOP concurred with the recommendation and stated that it would explore options to procure female Special Housing Unit space closer to Federal Correctional Institution Danbury.

**OIG Analysis:** BOP's planned actions are responsive to our recommendation. Please describe the options BOP considered to procure female Special Housing Unit space closer to Federal Correctional Institution Danbury, research conducted by BOP to assess each option considered, and the option BOP selected.