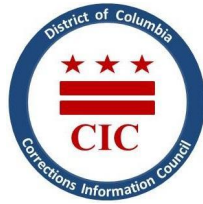


District of Columbia
Corrections Information Council

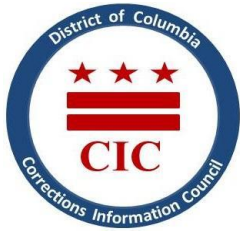


USP & ADX Florence
Report on Findings and Recommendations



USP Florence Administrative building

September 13, 2023



District of Columbia Corrections Information Council

Charles Thornton, Board Chair
Katharine A. Huffman, Board Member
Nkechi Taifa, Board Member

About the District of Columbia Corrections Information Council

The District of Columbia Corrections Information Council (CIC) is an independent oversight body mandated by the United States Congress and the Council of the District of Columbia to inspect, monitor, and report on the conditions of confinement in correctional facilities where residents from the District of Columbia are incarcerated. This includes facilities operated by the Federal Bureau of Prisons (BOP), the District of Columbia Department of Corrections (DOC), and private contractors.

The CIC reports its observations and recommendations to the District of Columbia Representative in the United States Congress, the Mayor of the District of Columbia, the Council of the District of Columbia, the District of Columbia Deputy Mayor for Public Safety and Justice, the Director of the BOP, the Director of the DOC, and the community.

Although the CIC does not handle individual complaints or provide legal representation or advice, individuals are still encouraged to contact the CIC. Reports, concerns, and general information from incarcerated D.C. residents and the public are very important to the CIC, and they greatly inform our inspection schedule, recommendations, and reports. However, unless expressly permitted by the individuals or required by law, names and identifying information of residents, corrections staff not in leadership, and members of the general public are kept anonymous and confidential.

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USP¹ Facility Overview

Facility Profile

Dates of Inspection: April 19-20, 2023

Location: Florence, Colorado

Security Level: High

Rated Capacity: 621

Population: 863

DC Code Offenders: 21

DC Code Survey Respondents: 17

Introduction

United States Penitentiary Florence (USP Florence) is part of Federal Correctional Complex Florence (FCC Florence), which includes Federal Prison Camp Florence (FPC Florence), Federal Correctional Institution Florence (FCI Florence), and USP Florence Administrative-Maximum (ADX Florence). The FCC Florence complex is approximately 1,673 miles from Washington, DC.

The DC Code offender population at USP Florence consists of 16 black male residents and 1 black transgender male resident. Fifteen residents have resided at USP Florence for less than three years. Nine residents identify as Muslim and six identify as Christian. Eight residents have their high school diploma or GED, and one resident has an Associate's degree. One resident received his GED while at USP Florence.

During the interview process, staff lost two Special Housing Unit (SHU) residents' confidential surveys. There were multiple reports indicating the involvement of a specific officer, as well as allegations of physical abuse of residents by the same officer. The CIC communicated the officer's name and allegations to USP Florence executive staff and requested a full search and follow-up regarding the whereabouts of the surveys. The surveys were not recovered, and the institution has not provided additional information.

BOP Response: The surveys were not recovered. In the future, when surveys are provided with the instruction for the inmates to return the survey directly to the intended recipient, staff and inmates will receive emphasized guidance on the instructions. The CIC may also mail the surveys to the inmates consenting to be interviewed in advance of the visit and request they bring it with them to the interview. This would avoid staff's role in handling the CIC's paperwork and ensure confidentiality.

¹ United States Penitentiary.

Key Findings

General

- On April 19th, the CIC discussed residents' problems with sending and receiving mail. Florence executive staff stated that they were unsure about the cause of the issue. On April 20th, executive staff communicated that mail room officers were not trained properly, and they received training that morning on how to properly handle incoming and outgoing mail.

BOP Response: An impromptu training was conducted during the CIC's visit for Correctional Systems staff regarding proper handling of incoming and outgoing mail.

- The facility is over capacity. The population is 863. USP Florence has a rated capacity of 631.

BOP Response: The CIC was advised that the BOP began an audit in 2020 to evaluate and maximize bedspace in BOP facilities. This audit is near completion, and the BOP is transitioning from relying on rated capacity to leveraging physical capacity and optimal capacity. Therefore, USP Florence currently operates at an appropriate capacity, based on the audit revisions.

- All residents referenced a practice of freezing inmate funds at USP Florence. If an outside person who is not incarcerated attempts to send money to an inmate at Florence, those funds are frozen if the outside person is also sending money to another person incarcerated in any BOP facility. Florence freezes the funds and prevents the Florence inmate from using them until the inmate is transferred or released.

BOP Response: Program Statement 4500.12, Trust Fund/Deposit Fund Manual outlines encumbrance of inmate funds for various reasons is essential. Careful consideration is given before any action; encumbrances are not made indiscriminately. An encumbrance may be made for various reasons (e.g., to ensure inmates do not seriously deplete their funds before release, disciplinary measures, inmate's request, claims). Encumbrances are at the Warden's discretion or the result of a disciplinary hearing sanction or notification of a pending Federal court order. FCC Florence reviews transactions where multiple outside contacts are involved, specifically with incoming and outgoing funds, to combat the introduction of contraband. If it is suspected money exchanges are being utilized to fund illicit activity, a temporary encumbrance of funds will be implemented until a thorough review can be conducted. Once a determination has been made that there is no illicit conduct, funds are released.

- If an outside person who is not incarcerated wants to call or email an inmate at Florence, the outside person is barred from the inmate's contact lists if they are already listed as an email or phone contact of anyone also incarcerated in any BOP facility. Most DC residents reported that CorrLinks² and phone contacts were removed from their accounts.

² CorrLinks is an email system that residents use to communicate.

BOP Response: In February 2023, the USP initiated a full contact review process. The process was communicated to the inmates, and it was specifically stated that contacts found to be active on any other accounts throughout the BOP will be approved on a case-by-case basis, e.g., verified family in BOP custody, approved inmate-to-inmate communication, and verified legal resources. Inmates can request through an Inmate Request to Staff Member form to the Special Investigative Services Department to have their contacts reviewed for approval.

- Residents who refuse to participate in the Inmate Financial Responsibility Program (IFRP) have their commissary restricted and phone time limited to five minutes per week.³ It is a Florence-specific practice that reportedly began in early March of 2023.

BOP Response: Inmates in FRP Refuse status have accounts encumbered for the amount owed. Commissary restrictions and phone restrictions are not applied for the reason of FRP non-compliance.

- Florence staff referenced the BOP Trust Fund policy⁴ as the justification for IFRP punishments and stated that limitations were up to the Warden’s discretion per this policy.

BOP Response: Inmates in FRP Refuse status have accounts encumbered for the amount owed. Commissary restrictions and phone restrictions are not applied for the reason of FRP non-compliance.

- Residents informed the CIC that they could receive privileges back in stages based on their length of participation in the IFRP. One resident stated that all residents start with five-minute phone calls, and he earned 15-minute phone calls after participating in the IFRP.

BOP Response: Inmates in FRP Refuse status have accounts encumbered for the amount owed. Commissary restrictions and phone restrictions are not applied for the reason of FRP non-compliance.

- Ten residents stated that they are completely unable to contact their family since their funds were frozen and CorrLinks contacts were removed.

BOP Response: Inmates in FRP Refuse status have accounts encumbered for the amount owed. Commissary restrictions and phone restrictions are not applied for the reason of FRP non-compliance. In some cases, contacts are reviewed by the Special Investigative Services (SIS) Department for security reasons and to ensure the orderly running of the institution. If the SIS

³ According to BOP Program Statement P5380.08, standard sanctions for not participating in IFRP include Parole Board notification and limitations or reductions related to furloughs, pay, work detail, UNICOR, commissary, housing status, community-based programs, release gratuities, and RDAP. However, the policy states that even “more stringent” commissary spending limitations exclude telephone credits.

⁴ BOP Program Statement “Trust Fund/Deposit Fund Manual” 4500.12 § 2.1(b), p. 16, Mar.14, 2018 (“Use of Trust Fund services is, however, a privilege; the Warden...may limit or deny the privilege of a particular inmate.”); *Compare with Ibid.* P5380.08.

Department determines there are no concerns that could potentially affect the security of the institution, the contact is approved and added to the approved contact list. Reviews of contacts can be requested via Inmate Request to Staff form to SIS.

- Eleven residents used the grievance process at USP Florence. The two most common issues are medical concerns and the disciplinary process. All residents who filed concerning the disciplinary process referenced the freezing of funds.

BOP Response: Program Statement 4500.12, Trust Fund/Deposit Fund Manual outlines encumbrance of inmate funds for various reasons is essential. Careful consideration is given before any action; encumbrances are not made indiscriminately. An encumbrance may be made for various reasons (e.g., to ensure inmates do not seriously deplete their funds before release, disciplinary measures, inmate's request, claims). Encumbrances are at the Warden's discretion or the result of a disciplinary hearing sanction or notification of a pending Federal court order.

- Of the 11 residents who filed a grievance, seven did not receive a response to their grievance.

BOP Response: Procedures for administrative remedy response due dates are monitored, documented, and discussed weekly with Executive Staff by the respective Associate Warden of each facility. Although the CIC did not provide specific inmate information regarding delays in the administrative remedy process, FCC Florence is conducting a review of the process in totality, to assess any oversights.

Housing

- The general population housing unit held 127 residents with a capacity of 128. Staff stated that the following day, the housing unit would receive an additional 30 to 35 residents.

BOP Response: There are currently no housing units maintaining an inmate population outside of their capacity, nor is there any future plans of any housing units to exceed their bed space capacity.

- The CIC observed four showers within the unit. Staff stated that the showers in the unit had plumbing issues and did not know how many were operable at the time.

BOP Response: Inmate showers have been repaired at USP Florence. All repair orders are monitored and tracked by the Facilities Department.

- The unit had four phones. Staff stated this was consistent across the facility.
- Vents were full of dust. Residents attributed it to the lack of air circulation.

BOP Response: Air vents at USP Florence have been cleaned. However, dust on air vents does not restrict the air circulation.

- Residents stated that there are not enough phones in the unit, which often causes verbal and physical fights.

BOP Response: All housing units currently maintain 4 phones in the common area. There have been no documented inmate altercations, either verbal or physical due to the current number of inmate phones. The Trust Fund Department ensures all reports of phone outages are assessed for resolution the same day or the following day (Monday-Friday) and ordinarily remedied no later than the next business day.

Stages

- This Florence-specific unit is composed of individuals with care level 3 mental health issues, particularly those with a history of harming themselves or others, and companions. There are four stages in the Stages program.
- There is one companion for every mental health resident. All residents and companions are housed as one person per cell.
- Companions are residents from general population who undergo an extensive interview process and live in-unit. They serve as peer specialists, and at the completion of the program they are certified by the Department of Labor. Companions receive compensation for their support.
- This housing unit is isolated from the general population. Residents have their own recreation yard, eat their meals in-unit, and program in the housing unit.
- When beginning the Stages program, mental health residents participate in programming while inside of cages. Residents complete the program by working through the programming stages. Additionally, residents are given privileges as they complete the stages, such as programming outside of the cages.
- Upon completion of the program, residents are eligible to go to another facility or into general population. Residents usually transfer to USP Allenwood where there is a Transitional Care Unit (TCU)⁵.
- Once a month, the executive staff, the medical department, and psychology department meet to discuss residents' individual progress.

Special Housing Unit (SHU)

- The psychology department reportedly makes weekly rounds in the SHU.
- Staff stated that it takes two to three weeks for the psychology department to see an individual in SHU after a request is made by the resident.

⁵ The Transitional Care Unit (TCU) exists to meet the needs of high security offenders with serious mental illness. It aids them in transitioning out of extended placement in restrictive housing.

BOP Response: There is a Staff Psychologist assigned to the Special Housing Unit (SHU), and SHU rounds are made throughout the course of the day, Monday through Friday, to address inmate mental health needs.

- Nurses make rounds to provide medication twice a day.
- Multiple residents stated that when they left the SHU, their personal property was missing, and they never received a property inventory slip (BP-A08321).⁶

BOP Response: Inmates released from the Special Housing Unit are issued their personal property either the same day or the following day. In the event an inmate identifies an issue with his property, i.e., damaged and/or missing items, a Tort Claim can be initiated and investigated for appropriate disposition.

Medical

- Staff stated that residents may not see a medical professional for weeks after submitting a sick call slip, but it depends on the medical issue.

BOP Response: Sick call requests are reviewed and triaged by health care providers, according to the nature of the concern. If a concern requires an outside provider, the scheduler will finalize an appointment accordingly. According to Program Statement 6031.04, Patient Care, "Virtually all clinical services provided to the inmates will be by appointment, scheduled several days to weeks in advance through a request from the inmate or follow-up appointments determined by the providers." Inmates approved and scheduled for an outside provider are notified via TRULINCS message when the scheduler has completed the appointment with an outside provider. For security reasons, the specific date, time, and location is not disclosed to the inmate. Urgent medical concerns are addressed immediately.

- Twelve of 17 residents stated that the medical department does not respond to sick call within 48 hours.

BOP Response: Sick call requests are reviewed and triaged by health care providers, according to the nature of the concern. Clinical services provided to inmates will be by appointment, which are accomplished within several days to weeks.

- There is one physician, two paramedics, one staff nurse, and one infection nurse. Lab and optometry are conducted by contractors.

⁶ The mandatory completion of a BP-A08321 is discussed in BOP program statement "Special Housing Units" 5270.11 §541.22, p. 4, Nov. 23, 2016. This form requires the signature of a resident indicating that their property has been returned.

- Pill line⁷ is two times a day and residents must have physical identification with them.
- There are three pharmacists for the entire complex. They operate from a central hub where pharmacists sort medication by its appropriate facility.
- All prescription medication is brought to the facility once a day by staff.
- Chronic care residents are seen once a year unless deemed otherwise by a doctor.
- There are three dentists and one hygienist.
- The medical department holds an open house on Mondays and Wednesdays. Staff stated that during open house residents can access the medical department with a sick call slip.

Mental Health Services

- There is a Deputy Chief Psychologist, two staff psychologists, and two treatment specialists.
- The psychology department has three care levels.
- Mental health care level one residents can request psychological services as needed. Care level two residents are to see the psychology department twice a month. Care level three residents see the psychology department weekly.
- During visits, care level two and three mental health residents participate in a review of individual therapy plans created during intake, as well as medication evaluations.
- Psychology programs include an anger management group and a course on criminal thinking.
- Eight out of 17 survey respondents reported knowledge of how to request mental health services.
- Two survey respondents stated that they were removed from their mental health medication.

BOP Response: Inmate's compliance with medication is reviewed by health services. If an inmate is non-compliant, misuses medications, or it is deemed no longer necessary, medical staff may discontinue. FCC Florence has an onsite Psychiatrist that can also review and evaluate the need for psychiatric medications and may discontinue, or change psychotropic medication, as deemed necessary.

- One resident stated he was given mental health medication although he requested individual therapy. He was not participating in any therapy at the time of the interview.

BOP Response: All inmates upon arrival are assessed by a Psychologist to determine the need for Mental Health Services. The treatment needs are determined by Psychology staff to include medication, individual therapy, or a combination of both.

⁷ Pill line is when staff gives residents medication.

Education & Programming

- GED and English as a Second Language (ESL) classes are conducted six days a week.
- Law library and educational computers are provided in the educational department.
- The USP partners with Pueblo Community College for post-secondary education. These classes are paid for by the resident and proctored by the education staff at the USP.
- Seven DC residents are enrolled in GED classes.
- Residents can purchase tablets through their trust fund account.
- Twelve out of 17 respondents stated that they were not enrolled in vocational programming.

Recreation

- The recreation department has a leather shop, painting, movie room, health & wellness resource room, food smart, tour de Florence cycling class, ceramics class, and board games.
- To request entrance to a program, residents must fill out a cop-out⁸ on TruLincs. Residents can also manually submit a request to recreation staff.

Religious Services

- The Islamic community is the largest religious group in the facility.
- There is one Muslim chaplain, three Christian chaplains, and one volunteer from the Jehovah's Witness community.
- No religious First Step Act (FSA) programs are currently at the USP.

⁸ "Cop-Out" is the Bureau form BP-Admin-70 Inmate Request to Staff. This form is used for residents to make a variety of requests to correctional staff.

USP Recommendations

- Punitive allocations of five minutes per week for telephone credits should be prohibited and consistent with the IFRP policy that even “more stringent” commissary spending limitations exclude telephone credits.⁹

BOP Response: Inmates are not restricted to five phone minutes per week. A request to the CIC was made to provide additional, specific information to review this claim.

- Inmates in FRP Refuse status have accounts encumbered for the amount owed.
- Commissary restrictions and phone restrictions are not applied for the reason of FRP noncompliance.

BOP Response: Contacts are reviewed by the Special Investigative Services (SIS) department for approval. If interactions external to Florence are not determined to disrupt the orderly running of the institution or present safety and security concerns, the contact(s) will be approved.

- It is recommended that the facility develop a less restrictive way to evaluate inmate contacts, which should not result in a complete freeze of financial support solely because of interactions external to Florence.

BOP Response: Contacts are reviewed by the Special Investigative Services (SIS) department for approval. If interactions external to Florence are not determined to disrupt the orderly running of the institution or present safety and security concerns, the contact(s) will be approved. There has not been a complete ban of phone or email communication at FCC Florence.

- The medical department should be audited regarding the time it takes to address sick call requests, then hire the staff necessary to facilitate timely compliance with stated protocols.

BOP Response: Sick call submissions by the inmate population are reviewed daily by health care providers and are triaged according to the nature of the medical concern. If a concern requires an outside provider, the scheduler will complete the appointment making process. According to Program Statement 6031.04, Patient Care, "Virtually all clinical services provided to the inmates will be by appointment, scheduled several days to weeks in advance through a request from the inmate or follow-up appointments determined by the providers." Inmates who are approved and scheduled for an outside provider are notified via TRULINCS message when the scheduler has completed the appointment with an outside provider. For security reasons, the specific date, time, and location is not disclosed to the inmate. Urgent medical concerns are addressed immediately.

⁹ See BOP Program Statement P5380.08

ADX¹⁰ Facility Overview

Facility Profile

Dates of Inspection: April 19-20, 2023

Location: Florence, Colorado

Security Level: Administrative Maximum¹¹

Distance from DC: 1,673 miles

Year of Opening: 1994

Rated Capacity: 551

Population: 325

DC Code Offenders: 16

Survey Respondents: 12

COVID Operations: Level 1

Introduction

United States Penitentiary (USP) Florence Administrative Maximum (ADX or ADMAX) is an administrative maximum-security facility located in Florence, Colorado. ADX is a lockdown facility, meaning residents are housed in single cells for 23 hours per day.

The CIC conducted interviews at ADX on April 19-20, 2023. Initially, the CIC was denied entry to ADX based upon the facility's similarity to BOP's Special Housing Units (SHU).¹² However, after further consideration from BOP executive staff and a letter of support from DC's Congresswoman Eleanor Holmes Norton, the CIC was granted access. Residents housed in ADX require the highest security protocols of all BOP facilities; the facility is regarded as the "supermax". The CIC was not able to tour the facility, but permission was granted to conduct interviews with DC Code offenders.

The total population at ADX is 325 residents, which represents 13% of the FCC. Currently, ADX holds 16 residents sentenced under the DC Code, which represents approximately 5% of the population.

The CIC conducted interviews in the gym on the first day of the inspection, and in the visitation hall on the second day of the inspection. Eleven of the sixteen residents sentenced under the DC Criminal Code were interviewed. Four residents declined to complete surveys and interview with the CIC. One resident did not come to the visitation hall for an interview due to time constraints; however, he was able to complete a survey.

¹⁰ Administrative Maximum.

¹¹ Commonly referred to as "super-maximum" or "supermax".

¹² In accordance with the current MOU between the CIC and BOP, CIC is not permitted to tour non-programming areas of facilities, which has been interpreted to include the SHU.

Key Findings

- The facility is comprised of seven housing units: Bravo (B) the control unit, Charlie (C), Delta (D), Echo (E), Fox (F), Golf (G), the Special Security unit (H); and two intermediate/transition units: Joker (J) and Kilo (K).
- Each resident is single celled. ADX residents are not permitted to integrate with other members of the population.
- Programming and religious services are provided on the televisions within cells.¹³ Some “group” programming is held in the gym, where each resident is placed in an individual cage-like enclosure to ensure separation.
- Due to security measures, each resident was accompanied by two corrections officers and a lieutenant for each interview.

Interviews

- Residents stated that there is very little programming available on the in-cell televisions.
- Residents stated that the facility is encumbering funds and restricting access to money in their accounts at the discretion of the current warden.

BOP Response: Program Statement 4500.12, Trust Fund/Deposit Fund Manual outlines encumbrance of inmate funds for various reasons is essential. Careful consideration is given before any action; encumbrances are not made indiscriminately. An encumbrance may be made for various reasons (e.g., to ensure inmates do not seriously deplete their funds before release, disciplinary measures, inmate's request, claims). Encumbrances are at the Warden's discretion or the result of a disciplinary hearing sanction or notification of a pending Federal court order. FCC Florence reviews transactions where multiple outside contacts are involved, specifically with incoming and outgoing funds, to combat the introduction of contraband. If it is suspected money exchanges are being utilized to fund illicit activity, a temporary encumbrance of funds will be implemented until a thorough review can be conducted. Once a determination has been made that there is no illicit conduct, funds are released.

- Residents communicated that the encumbrance is a result of refusing to participate in the Inmate Financial Responsibility Program (IFRP) and First Step Act (FSA) programs.¹⁴

BOP Response: Inmates in FRP Refuse status have accounts encumbered for the amount owed. Commissary restrictions and phone restrictions are not applied for the reason of FRP non-compliance. Participation in FSA programming is not mandatory; inmates can elect to opt-out of FSA programming but may not receive all the receive the additional privileges afforded to them.

¹³ In-cell televisions are typically not allowed at Bureau of Prisons' facilities.

¹⁴ As of this inspection, DC residents do not receive FSA credits from FSA eligible programs.

- One resident said, “I have a TV in my cell, but it’s currently unplugged because I won’t participate in the IFRP.”

BOP Response: A television in the cell is a privilege and may be removed if an inmate refuses to participate in programming, alters the television and/or refuses to participate in IFRP. If the inmate decides to participate in programming or IFRP, the television may be returned. Programming is made available to an inmate by request via an Inmate Request to Staff form.

- Residents who refuse to participate in FSA programming have a sign posted on their cell door, which indicates that they are FSA non-compliant.

BOP Response: Participation in FSA programming is very beneficial to an inmate's re-entry to the community, but it is also voluntary. Inmates are encouraged to participate in FSA programming. However, it is the responsibility of the inmate to inquire, sign up and actively participate to receive the benefits. If an inmate refuses to participate in FSA programming, no action is taken, and no restrictions are assessed. However, at a minimum, completion of the FSA Questionnaire and Assessment is a mandatory requirement for all inmates. Inmates who do not complete the FSA Questionnaire and Assessment do not receive the additional privileges afforded to them.

- Due to the encumbrance of funds, residents indicated that they are unable to purchase items such as hygiene supplies, stamps, and over-the-counter medication.

BOP Response: If an inmate needs hygiene items, a request can be made to the Unit Team to receive personal hygiene items, if they do not have them. Additionally, if an inmate requires over-the-counter medications a sick call request can be submitted, and a medical provider will assess their medical concern and prescribe the medications, if deemed medically necessary.

- Interviewees indicated that the Muslim chaplain has not made any rounds in the units, which are required for prayer or support services.

BOP Response: FCC Florence has a Muslim chaplain that makes rounds with the executive staff to each housing unit weekly, at a minimum. For specific religious requests outside of rounds, inmates may also submit an Inmate Request to Staff to the Chaplain, either electronically or via a paper form.

- Residents stated that their phone lists are altered or blocked by ADX.¹⁵

BOP Response: For security reasons, all inmates who arrive at the ADX are subject to a thorough review of contacts. Any approved contacts prior to arrival at the ADX are void, upon arrival. This process is communicated to the inmates during intake screening. Inmates are instructed to complete

¹⁵ Similar to the aforementioned phone policy issues at USP Florence.

a new contact request form for phone numbers they wish to add to their contact list. The SIS Department reviews the phone numbers for safety and security reasons and to ensure the orderly running of the institution. Contacts found to be active on any other accounts throughout the BOP will be approved on a case-by-case basis, e.g., verified family in BOP custody, approved inmate-to-inmate communication, and verified legal resources. Inmates may request, through an Inmate Request to Staff Member form to the Special Investigative Services Department, to have their contact reviewed for approval. The inmate is made aware of the reason for any denials.

- One resident said, “I filled out a phone slip, which took six months for a reply. When I got it back, SIS said I had to provide a phone bill to verify that [the] person is real and this is a real phone number.”

BOP Response: Due to the unique security concerns of ADX Florence, all contact lists are reviewed and will be verified before the contact is approved.

ADX Recommendations

- It is recommended that the facility develop a less restrictive way to evaluate inmate contacts, which should not result in a complete freeze of financial support solely because of interactions external to Florence.

BOP Response: Contacts are reviewed by the (SIS) department for approval. If interactions external to Florence are not determined to disrupt the orderly running of the institution or present safety and security concerns, the contact(s) will be approved.

- It is recommended that the facility develop a less restrictive way to evaluate inmate contacts, which should not result in a complete ban on phone or email communications solely because of their communications external to Florence.

BOP Response: Contacts are reviewed by the Special Investigative Services (SIS) department for approval. If interactions external to Florence are not determined to disrupt the orderly running of the institution or present safety and security concerns, the contact(s) will be approved. There has not been a complete ban of phone or email communication at FCC Florence.

- The Muslim chaplain should make rounds in the units.

BOP Response: FCC Florence has a Muslim chaplain that makes rounds with the executive staff to each housing unit weekly, at a minimum. For specific religious requests outside of rounds, inmates may also submit an Inmate Request to Staff to the Chaplain, either electronically or via a paper form.

- If ADX Florence is short-staffed, the facility should seek community partners that can supplement any religious leader vacancies. Potential partners include the Islamic Society of Colorado Springs, Colorado Islamic Center, and various groups located in nearby cities with diverse populations.

BOP Response: We routinely request outside assistance from community resources. However, Chaplains within the Bureau of Prisons are required to provide services to all faith groups regardless of the Chaplains denomination. FCC Florence encourages the CIC to direct interested candidates to the USAJOBS website for BOP employment opportunities. Likewise, interested volunteers may inquire with our facility.