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FCI Allenwood Medium Inspection Report

**District of Columbia
Corrections Information Council**

JANUARY 9, 2017

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 inmates from the District of Columbia are incarcerated. This includes facilities operated by the Federal Bureau of Prisons (FBOP), 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 FBOP, 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 DC inmates 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 inmates, corrections staff not in leadership, and members of the general public will be kept anonymous and confidential.

DC Corrections Information Council

2901 14th Street, NW
Ground Floor
Washington, DC 20009
Phone: (202) 478-9211
Email: dc.cic@dc.gov

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Executive Summary

FCI Allenwood Medium

Date of Inspection: April 22, 2016
Location: White Deer, Pennsylvania
Distance from DC: 193 Miles from DC
Transportation: 3 Hours 40 Minutes by Car /
5 Hours 35 Minutes by Bus

INSTITUTION PROFILE

Security Level: Medium
Rated Capacity: 919
Occupancy: 1252 (136% capacity)
DC Inmates: 101 (8.06% of total population)
Average Age of DC Inmates: 41 years old
Average Sentence of DC Inmates: 173 months
Inmate-to-Staff Ratio 4.26 : 1

FINDINGS

- **Mental Health Care:** FCI Allenwood Medium has driven DC inmates with mental health needs at Care Level III to DC to CSOSA, Community Connections, and other service providers.
- **Employment:** Three out of every four inmates at the facility are employed.
- **Dental Care:** The CIC observed that the dental department had an array of new and state-of-the-art equipment.
- **Recreation:** Regarding various aspects of daily life, DC inmates were most satisfied with recreation programs.
- **Staff:** The CIC received reports of physical abuse.
- **Administrative Remedies:** Most common reasons why DC inmates do not file grievances include that the grievance process not working and fear of staff retaliation.
- **RDAP:** At the time of the inspection, 112 inmates actively participated in RDAP Unit, only three of whom were DC inmates.
- **SHU:** Staff reported that one inmate had been in SHU for over a year and that three inmates in SHU were diagnosed with a mental health issue.
- **Hygiene:** DC inmates reported not having enough clean clothes for the week and that the units are unclean.
- **DC Specific Issues:** The majority of DC inmates reported that staff treats them worse than other inmates. DC inmates reported staff harassment due to their DC residency status. DC inmates also complained that they are discriminated against with regards to programming and employment. DC inmates were nearly unanimous in expressing their desire to move closer to home.

RECOMMENDATIONS

1. Investigate claims about dirty laundry to ensure efficient and reliable laundry services.
2. Provide sentence reductions for completing the RDAP to DC inmates who committed their crimes before August 5, 2000 and/or sentenced for a “crime of violence” under D.C. Code § 23-1331(4).
3. Ensure that all areas accessible to inmates are also accessible to inmates with disabilities.
4. Ensure that medically appropriate and adequate meal options and snacks are available, especially for diabetic and chronic care inmates.
5. Recruit Public Health Service Officers to address the mental health care vacancies at FCI Allenwood and to minimize treatment delays.
6. Ensure inmate access to administrative remedy request forms and assess units to determine whether some provide better access to forms than others.
7. Ensure that the warden responds within 20 calendar days, the regional director responds within 30 calendar days, and the general counselor responds within 40 calendars to administrative remedy requests.
8. Stress the importance of zero tolerance of staff retaliation or intimidation of inmates who wish to file an administrative remedy, with meaningful personnel consequences for staff who violate the FBOP’s objectives.
9. Report all claims of threats by staff and staff retaliation for filing an administrative remedy request to OIA, OIG, and BJS.
10. FCI Allenwood Medium should incorporate developmentally responsive policies and practices for young adults and limit the severe sanctions placed on young adults housed in the SHU.
11. Complete routine disciplinary investigations within seven working days of the filing and all other disciplinary investigations within 30 days of the issuance of an incident report (absent compelling circumstances). Require approval by the Warden for investigations lasting longer than 30 days.
12. Reduce maximum penalties for disciplinary segregation and impose a sanction of disciplinary segregation only as necessary and only after determining, in writing, that other available sanctions are insufficient to serve purpose of punishment.
13. Implement a cultural diversity sensitivity training program.
14. The FBOP should investigate for illegal use of force at FCI Allenwood Medium. FCI Allenwood should monitor the staff to ensure the safety of inmates.
15. Establish a standardized curriculum for the Release Preparation Program (RPP) across all FBOP facilities.
16. Provide opportunities for DC agencies and other organization to compile and disseminate reentry resources to DC inmates.
17. Use front number of indeterminate sentence to determine programming eligibility.
18. Review and update information in the Inmate Information Handbook, specifically update the address listed for the USPC.
19. Ensure that CIC’s Special Mail privileges are followed by staff and listed in the Inmate Information Handbook.
20. FCI Allenwood Medium should restrict the use of conducting visual searches on DC inmates wishing to interview with the CIC in accordance with FBOP policies.

I. Facility Profile

Federal Correctional Institution (FCI) Allenwood Medium is an all-male, medium security level facility located in White Deer, Pennsylvania. It is 193 miles from DC and three and a half hours from DC by car. The institution has four general population housing units, and a Special Housing Unit (SHU).

According to an American Correctional Association (ACA) audit conducted in July 2013, the rated capacity of FCI Allenwood is 938 with the average daily population being 1289. Documents provided to the CIC by the Bureau of Prisons state rated capacity of FCI Allenwood as 919. At the time of the CIC inspection, the facility population was 1252, which represents 136% capacity. A total of 101 DC inmates comprised 8.06% of the population.

II. Inmate Feedback Summary

When DC inmates were asked to provide the most positive aspect of FCI Allenwood Medium, the most popular answers included safety, education, and UNICOR. With regards to safety, DC inmates stated that FCI Allenwood Medium is “not as high strung or stressful as other facilities” and that safety is promoted by the “overall cool, calm, and collected attitudes” of the inmates. The CIC also received responses that recreation and the fish tank in the education department are positive aspects of the facility.

When DC inmates were asked about the most negative aspects of FCI Allenwood Medium, the most popular answer was the staff. In particular, DC inmates reported that staff is disrespectful, racist, and unprofessional. Additional concerns regarding staff include the stereotyping of DC inmates as “007”s¹ and that staff are more likely to pat down inmates from DC, particularly those who are younger. One DC inmate noted that staff does not know how to handle 1987 guidelines and another that the DHO deals with shots in the extreme.

Other responses regarding the most negative aspects of FCI Allenwood Medium include hygiene: that the facility is not clean and that clothes are dirtier after going through laundry. DC inmates who were interviewed were also concerned with the poor quality of the food, lack of notification of parole hearings, co-payment for healthcare, and the SHU.

¹ Each inmate entering into federal custody are assigned an eight-digit federal register number by the U.S. Marshals Service. The last three digits of the federal register number signify the district where the individual was arrested or processed into the system. Typically, DC inmates will have a federal register number ending in “000,” “007,” or “016.”

III. Methodology

The CIC conducted an onsite inspection of FCI Allenwood Medium on April 22, 2016. Prior to the onsite inspection, the CIC communicated with all DC inmates at FCI Allenwood Medium, informing them of the impending inspection and offering them the opportunity for a confidential interview with a member of the CIC. During the onsite inspection, the CIC was escorted by the Executive Assistant. The onsite inspection consisted of confidential interviews with DC inmates, a tour of the facility, limited dialogue with facility staff, and a closing session with executive staff.

Both before and after the onsite inspection, the CIC reviewed general inmate and DC inmate data, significant incidents, urine surveillance, and disciplinary records. The CIC also reviewed an education report, menus, the most recent American Correctional Association (ACA) Audit, and administrative remedy filings and responses at the facility, regional, and central office levels.

After the CIC inspection process was completed, the CIC requested from FBOP responses to follow-up questions. The FBOP responses to the CIC draft report are included in the final published report.

IV. Housing

FCI Allenwood Medium has three buildings with a total of six housing units. Excluding the RDAP unit, each building consists of two housing units that are staffed by two Unit Managers, two Correctional Officers, two Case Managers, and two Counselors during the day Monday through Friday. For evenings and weekends, each building has one Unit Manager and one Correctional Officer.

The CIC conducted an onsite inspection of Unit 1A. The capacity of Unit 1A, as well as of every other housing unit, is 156. The housing unit has 12 open showers, eight televisions, six computers, five tables, four phones, one microwave, and one ice machine. Each individual cell has a toilet. Currently, there are four six-man cells in each housing unit. During the inspection, the Warden stated the facility plans to convert the six-man cells to three-man handicapped cells within the year. According to the FBOP response to this report providing an update on this project, FCI Allenwood Medium has converted 63% of the six-man cells.

A. Hygiene

As stated by the FBOP, washer/dryer services for inmates may be operated at the Warden's discretion under the Trust Fund Program to meet the FBOP's objective to provide efficient and reliable laundry services.² Washing machines and dryers have been removed in Unit 1A in an

² FED. BUREAU OF PRISONS, U.S. DEP'T OF JUSTICE, PROGRAM STATEMENT NO. 4500.11, TRUST FUND/DEPOSIT FUND MUTUAL (April 9, 2015).

effort to centralize the laundry. The centralized area contains four 160-pound washing machines and four 190-pound dryers. Laundry services are available Monday through Friday, and inmates can exchange clothing, sheets, and blankets during the morning “Open House” period from 6:00 A.M. to 7:30 A.M..

DC inmates reported that hygiene was satisfactory regarding access to showers, clean sheets, and cleaning chemicals. Twelve out of the 20 DC inmates interviewed, however, reported not having enough clean clothes for the week. Regarding overall cleanliness, DC inmates on average reported that the units are unclean.

DC inmates provided specific examples to support reports of not having enough clean laundry for the week. According to one DC inmate, clothing that has been cleaned remain unclean. Others indicated that it takes one week to get clothes replaced, that the three underwear and three shirts provided are inadequate, and that blankets are exchanged once a month. One DC inmate reported not being able to change sheets even after spills or getting sick.

Recommendations

1. *Investigate claims about dirty laundry to ensure efficient and reliable laundry services.*

- DC inmates reported that the clothes are washed and come back dirty due to the facility using recycled water in the washing machines. According to the FBOP response to this report, FCI Allenwood Medium does not use recycled water during any phase of the laundry process. Investigating claims about dirty laundry to ensure efficient and reliable laundry services are available to inmates would satisfy the FBOP’s objectives for the Trust Fund Program.³

V. RDAP

The Residential Drug Abuse Program (RDAP) is a minimum of 500-hours with a duration of 9 to 12 months available to inmates with a verifiable substance abuse disorder who have signed an agreement acknowledging program responsibility who are able to complete all three components of the program and, ordinarily, have 24 months or more remaining on their sentence.⁴ Furthermore, inmates admitted to RDAP must not have a cognitive impairment or learning disability precluding participation or be unable to participate in the language in which it is conducted.⁵ Inmates must also be eligible for halfway house placement. Programming is conducted from 7:30 A.M. to 10:30 A.M. every day. If inmates successfully complete the program and cannot release directly to a halfway house, they are required to participate in continuing treatment.

³ Id.

⁴ FED. BUREAU OF PRISONS, U.S. DEP’T OF JUSTICE, PROGRAM STATEMENT NO. 5330.11, PSYCHOLOGY TREATMENT PROGRAMS (May 26, 2016).

⁵ Id.

The program is available to individuals meeting the admission criteria stated above, however, the criteria stated above presents several concerns as they apply specifically to DC inmates. Because some DC inmates are serving indeterminate sentences, they do not know the exact date when they will be released. A DC inmate serving a split sentence (e.g. 10-30 years) will not have a halfway house date until after they have a parole hearing, receive a notice of action, and have necessary paperwork completed by his case manager. Consequently, current policy prevents some DC inmates from enrolling in the RDAP.

Moreover, due to the nature of their local offenses, many DC inmates do not qualify to receive the incentives for RDAP participation, including early release.⁶ Inmates who have a current felony conviction for a crime of violence – including homicide, forcible rape, robbery, aggravated assault, arson, and kidnapping – are not eligible for early release.⁷ As reported by the DC Department of Corrections, approximately 35% of male DC inmates and 23% of female inmates are incarcerated on violent or dangerous offenses.⁸ Given the nature of local DC code offenders being placed in the federal system, the eligibility requirements for early release preclude many DC inmates from receiving the incentives provided by FBOP for RDAP participation.

Active participants in the RDAP are placed in Unit 1B, which has a capacity of 120 inmates. During the CIC inspection, 112 inmates actively participated in RDAP, three of whom were DC inmates. The unit is staffed by one psychologist, one unit manager, one case manager, one drug treatment coordinator, four drug treatment specialists, and one counselor. The program also has four to six inmate mentors. The RDAP unit has only two-man cells. The unit also has six computers and four phones.

Recommendations

2. ***Provide sentence reductions for completing the RDAP to DC inmates who committed their crimes before August 5, 2000 and/or sentenced for a “crime of violence” under D.C. Code § 23-1331(4).***
 - The FBOP should encourage and incentivize DC inmates to enroll in the RDAP to further the FBOP’s efforts to address criminogenic needs related to substance abuse and thereby ensuring DC inmates’ successful transition back to the community upon release.⁹ Due to the nature of their local offenses, many DC inmates do not qualify for the RDAP incentive. The FBOP should provide sentence reductions for completing the RDAP to DC inmates who committed their crimes before August 5, 2000 and/or sentenced for a “crime of violence” under D.C. Code § 23-1331(4).

⁶ Id.

⁷ FED. BUREAU OF PRISONS, U.S. DEP’T OF JUSTICE, PROGRAM STATEMENT NO. 5331.02, EARLY RELEASE PROCEDURES UNDER 18 U.S.C. § 3621(E) (May 26, 2016).

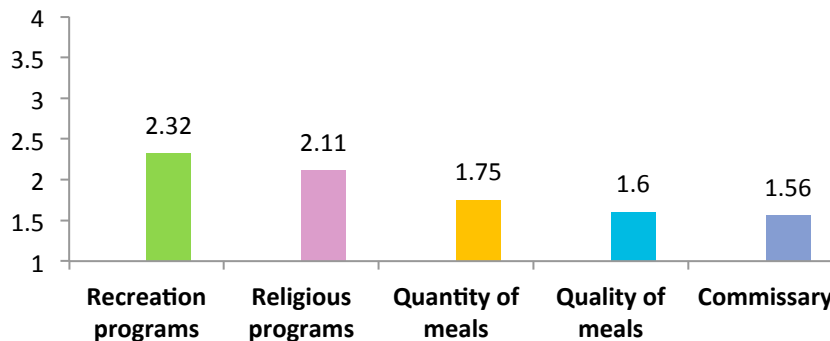
⁸ Facts and Figures, “Offenses by Most Serious Active Charge,” DC Department of Corrections (June 2016).

⁹ FBOP, <https://www.bop.gov/about/agency/>.

VI. Daily Life

DC inmates reported below average levels of satisfaction regarding the quality of meals, quality of meals, recreation, religious services, and commissary. From a scale of 1-4 (with 4 as the most satisfied), recreation programs were ranked highest at 2.32, and the commissary was ranked lowest at 1.56 (Figure 1).

Figure 1
Inmate Satisfaction: Daily Life
(Out of 4 points)



A. Religious Services

There are 16 active faiths at FCI Allenwood Medium, the largest of which are Protestant, Muslim, and Messianic Judaism. The facility has two chaplains and more than five Moorish and Jewish volunteers per week. For the past seven months, the facility only had one Protestant chaplain but has recently hired a Jewish chaplain. Chaplains at FCI Allenwood Medium currently facilitate the Life Connections Program, Bible Study every Monday, and the Threshold Program (upcoming), which is a voluntary non-residential, faith-based reentry program. According to the FBOP response, FCI Allenwood Medium currently has the Threshold Program, but there is not a Life Connections Program. At the time of the CIC's inspection, 20-30 participants were anticipated for the Threshold Program. The facility has two chapels and one classroom, as well as a Protestant choir that offers both English and Spanish services.

The Life Connections Program at FCI Allenwood Medium is an 18-month program. To be eligible for the Life Connections Program, the individual is required to have more than 24 months left in his sentence. At the time of the CIC's inspection, the Chaplain reported a total of two participants in the Life Connections Program but was unable to confirm the number of DC inmates participating in the program. Afterwards, the facility stated that zero DC inmates participate in the Life Connections Program at FCI Allenwood Medium. Currently there is a wait list for the program, but zero DC inmates are on it.

Regarding religious services, one DC inmate reported that the facility did not follow the memo regarding Passover. One commented that there is not enough time for worship. Another reported

limited access to Islamic literature and that Islamic religious teachers are scrutinized more than other religious teachers.

B. Commissary

Each inmate, whether in general population or Special Housing Units, is allowed to make purchases at the Commissary once a week during the noon meal and after the 4:00 P.M. count clears. The maximum spending limit is \$320 per month. After the CIC inspection, FCI Allenwood provided the CIC with a commissary brochure listing the available items available and their prices at the Commissary.

According to the facility's Inmate Handbook, the Commissary employs a limited number of inmates and has a separate pay scale than that of most job assignments falling under the parameters of the Inmate Performance Pay (IPP) System. Typically, job assignments in Commissary have a higher pay rate. At the time of CIC's inspection, zero DC inmates were employed in the Commissary.

Nearly half of all DC inmates interviewed expressed concerns about the high prices of commissary items in general and the lack of variety provided. One particular concern was that the cost of shower shoes is too high.

C. Recreation

FCI Allenwood Medium's recreation areas include the recreation yard, hobby shop, gymnasium, and music area. According to the ACA Audit conducted in 2013, indoor activity areas include a gymnasium, equipment room, fitness room, game area, hobby craft room, ceramic kiln room, music band room, wellness resource room, two small multi-purpose rooms, television viewing area, and a piano room. Outdoor activity areas include two softball fields, a flag football field, a soccer field, a sand volleyball pit, six fitness stations, four handball/racquetball courts, a circular track, a handicapped walking track, three basketball courts, an eight-table pavilion area, a courtyard, two bocce ball courts, and two horseshoe pits. The Recreation Department is led by the Complex Recreation Supervisor, two Assistant Recreation Supervisors and 15 Recreation Specialists.

The Recreation Department promotes and encourages the use of inmate assistants. Inmates may submit a request to Staff indicating his interest in becoming an inmate assistant, and those who successfully complete the requirements can be recommended through the Inmate Performance Pay System for achievement pay. Recreation programs are supervised by the Education Department. Programs include intramural team sports as well as physical fitness and weight reduction programs.

DC inmates commented that options for recreation are limited. One DC inmate suggested that the facility needs more equipment and a recreation specialist. Another DC inmate could not access most equipment in recreation because it is not wheelchair-accessible. The CIC received positive feedback from an inmate who expressed that recreation is good and provides holiday events, basketball, baseball, and football.

D. Meals

FCI Allenwood Medium follows standard FBOP menu guidelines¹⁰ and offers heart-healthy, vegetarian, kosher, and halal diet options. Religious diets are prepared in a separate room. Inmates in the SHU eat the same meals as inmates in general population. Inmates are provided with one serving of main entrée, one serving of starches, one serving of dessert (when served), and one piece of fruit (when served). Breakfast is served at 6:30 a.m., and lunch is served at 10:30 a.m. Dinner is served at 5:00 p.m. No food items may be removed from food service. After the inspection, the facility stated that the cost per inmate per day for meals is \$3.24. At the time of CIC's inspection, five DC inmates were employed in Food Services.

Regarding food, DC inmates reported inadequate meal sizes; in particular, two diabetic inmates indicated that food choices and portions are both lacking. In lieu of adequate portions, inmates noted that they are often encouraged to buy food instead at the commissary and that prices of commissary food are too high. Inmates also indicated that the food is not always cooked completely, and one inmate reported gaining 40 pounds in the past three years at FCI Allenwood Medium due to unhealthy food.

Recommendations

3. Ensure that all areas accessible to inmates are also accessible to inmates with disabilities.

- A DC inmate said he could not access most of the equipment in recreation. FCI Allenwood Medium should ensure that all areas accessible to inmates are also accessible to inmates with disabilities. A primary recommendation is to install ramps or elevators for the use of inmates with disabilities. For further guidance, the facility should refer to the requirements under the Rehabilitation Act of 1973 concerning accessibility for disabled persons that are applicable to federal facilities as explained in the "Uniform Federal Accessibility Standards/Fed. Std. – 795, 4/1/88 Edition" (UFAS).¹¹

4. Ensure that medically appropriate and adequate meal options and snacks are available, especially for diabetic and chronic care inmates.

- DC inmates reported inadequate meal sizes and options for diabetic inmates. DC inmates stated that they are, instead, encouraged to buy food at the Commissary. Because of high prices of commissary food, this alternative is not viable. A primary recommendation is to offer adequate amounts of medically appropriate options at mainline self-selection and directly provide supplemental snacks. Following FBOP policy, FCI Allenwood should ensure that appropriate and adequate amounts of

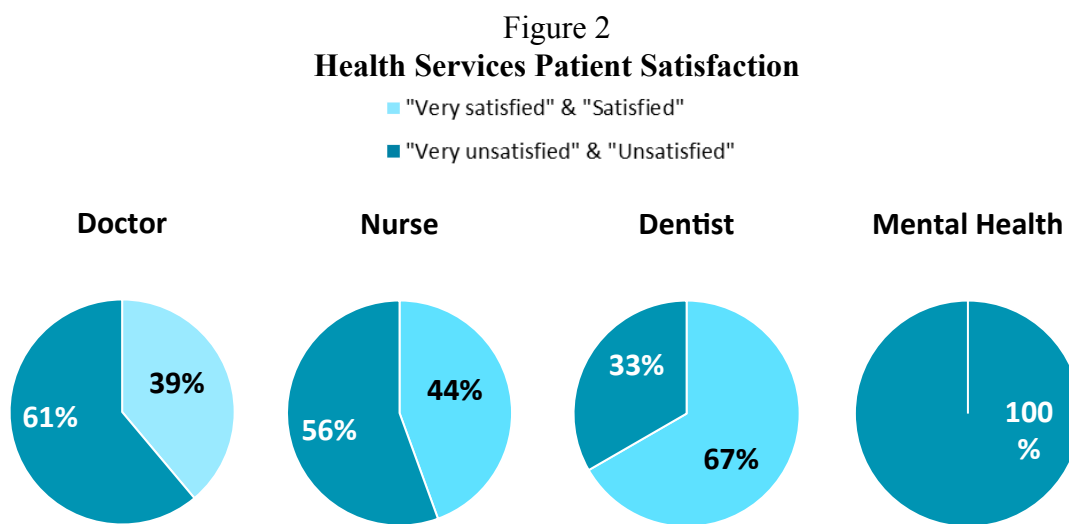
¹⁰ FED. BUREAU OF PRISONS, U.S. DEP'T OF JUSTICE, NATIONAL MENU FY 2016.

¹¹ FED. BUREAU OF PRISONS, U.S. DEP'T OF JUSTICE, PROGRAM STATEMENT NO. 4220.05, DESIGN AND CONSTRUCTION PROCEDURES (July 29, 2016).

medical diets are available for mainline self-selection.¹² Additionally, health conscious snacks can be provided directly rather than through the Commissary.

VII. Health Services

The CIC asked DC inmates to rate their satisfaction with various health services staff, including the doctor, nurse, dentist, and mental health staff. Satisfaction ratings encompassed both accessibility and quality of care. The dentist had the highest number of satisfied DC inmates (67%), and mental health had the lowest, with 0% of inmates reporting satisfaction (Figure 2).



A. Medical Care

FCI Allenwood Medium is a Medical Care Level III facility. While onsite, medical staff informed the CIC that 25% of the inmates at the facility are Level III. Through requested follow-up information, the facility reported that there were six Level III DC inmates. During the inspection, the medical staff was asked to report on the number of chronic care inmates at the facility but was unable to do so. Through follow-up information, the facility stated that chronic care inmates are seen yearly or sooner if indicated. The physician determines whether an inmate is placed on the chronic care caseload based upon a clinical history and diagnostic testing.

The Health Services Department at FIC Allenwood includes two doctors, a contract optometrist, two nurse practitioners, four medical technicians, five physician assistants, four paramedics, three or four licensed practical nurses and three registered nurses. One of the doctors is the administrator over the FCC. A doctor generally conducts between 20-30 chronic care visits per

¹² FED. BUREAU OF PRISONS, U.S. DEP'T OF JUSTICE, PROGRAM STATEMENT NO. 4500.06, FOOD SERVICE MANUAL (July 29, 2016).

day. Mid-level providers (MLP)¹³ see 40-50 inmates per day. Throughout the day, a doctor is available from 7:30 A.M. to 3:30 P.M. MLPs are available from 5:30 A.M. to 3:30 or 4:00 P.M. Emergency staff is available in person until 10:00 P.M. and afterwards on call. The average wait time for physicals is two weeks. Routine sick calls are handled within a few days, and eye care is handled within one month. Most other procedures, if urgent, are triaged within one day. Inmates pay \$2.00 for each sick call and do not pay for emergency care, chronic care, or care for indigent inmates.

The medical department is equipped with an audiology/hearing lab, a radiology room, an examination room, a suicide watch room equipped with cameras and call buttons, an urgent care room, and a laboratory. If necessary, inmates are sent to Evangelical Hospital in Lewisburg, Williamsport Hospital, or Danville Hospital. Lab work is done in house by contract Monday through Thursday. Many procedures have been contracted out, such as MRI, ophthalmology, and optometry, but the facility follows FBOP Directives for Preventative Care.

At FCI Allenwood Medium, medication is provided three times a day through a pill line. Inmates are able to self-carry medication with pickup at 3:00 P.M. Diabetic inmates may also have blood sugar checks at pill line. Diabetic patients, of which FCI Allenwood Medium has many, have a local endocrinologist and internist in the facility who prescribe medications. For all patients, sick call triage is Monday, Tuesday, Thursday, and Friday from 6:30 to 7:30 A.M.

Overall, DC inmates reported delays in receiving care and poor quality of care. More than half of the DC inmates interviewed reported that health services rarely responds to sick call slips within 48 hours. One DC inmate commented that he had to wait for a week and another that he had to wait four days. One DC inmate indicated that response to sick call slips depends on who is working. DC inmates interviewed also reported poor quality of care, including referrals to the commissary in lieu of receiving medication from health services.

A total of 12 DC inmates interviewed are on the chronic care caseload. Four of these DC inmates reported receiving timely follow-ups while eight did not. The CIC received several examples of problems regarding chronic health care, including one DC inmate who is HIV positive and has not been receiving information about his status; one who requires one-on-one therapy but has not received it; and one who is concerned about losing sight in his eye because his eye surgery was approved, canceled, and then scheduled too late.

B. Dental Care

Dental care is provided onsite at FCI Allenwood Medium. The Dental Department is staffed by one dentist, one dental hygienist, and one contract dental assistant. A regional dentist or oral surgeon visits the facility every two months. Staff is available Monday through Friday from 7:30 A.M. to 3:30 P.M.

¹³ The MLP serves as the primary point of contact for inmates assigned to their caseload. They serve as the primary provider for (1) routine requests for evaluation of new complaints; (2) ongoing management of reoccurring conditions; and (3) emergencies when clinically indicated. FED. BUREAU OF PRISONS, U.S. DEP'T OF JUSTICE, PROGRAM STATEMENT NO. 6031.004, PATIENT CARE (June 3, 2014).

The Dental Department provides full-service treatment including instructional hygiene care, diagnosis of dental disease, restorations, extractions, dental prostheses, and other treatment. The office has four chairs, but the average wait time for hygiene appointments is two months, and the average wait time for dentures or partials is about six months. On average, the dentist sees between 12 and 14 inmates a day, six to seven sick calls, and six to seven routine care. The hygienist sees ten inmates per day. Dentures or partials appointments are seen on average 30 to 40 times a week. On the day of the CIC inspection, the hygienist saw 10 inmates, and the dentist saw 12 inmates (six sick calls and six routine). During the inspection, staff reported problems with getting medical records from DC Department of Corrections to FBOP for DC inmates even though all medical records at the facility are electronic.

The majority of DC inmates interviewed reported positive experiences with the dentist. The CIC received only one specific example, which was from a DC inmate who indicated he waited one year for a teeth cleaning.

C. Mental Health Care

FCI Allenwood Medium is a Mental Health Care Level II facility. The Psychology Services staff includes four psychologists, two nonresidential drug treatment specialists, administrative staff, and one intern. The mental health staff sees mental health patients monthly who are at a Care Level II. At the time of the CIC inspection, two inmates had mental health needs at Care Level III and were seen weekly. One DC inmate has mental health needs at Care Level III. For these DC inmates, the facility has driven them to DC to CSOSA, Community Connections, and other providers. University Legal Services (ULS) has coordinated transport plans with the Psychology Department and have met with DC inmates at provider locations in DC. Psychology services staff conducts rounds in the SHU at least once a week. Psychology Services also offers an open house period and utilizes telepsychology for more complicated cases.

The department is responsible for providing comprehensive psychological services, as well as Employee Assistance counseling as needed. According to a 2013 ACA audit, inmate psychological services include intake and diagnostic screening interviews, individual and group psychotherapy, crisis intervention, Prison Rape Elimination Act (PREA)-related cases, a Suicide Prevention program, and a Management of the Mentally Ill program. Three DC inmates are enrolled in a non-residential drug program. At the time of the CIC inspection, group therapy sessions were one hour long and discussed topics such as drug groups, anger management, coping skills, seeking strength, and safety. Individual therapy sessions occurred about once a month for 30 to 45 minutes. The Challenge program and the Sex Offender Management Program (SOMP) are not offered at FCI Allenwood Medium.

FBOP policy requires facilities to implement suicide prevention practices.¹⁴ Inmates who pose a suicide risk are placed on Suicide Watch. At the time of the CIC inspection, one non-DC inmate was on Suicide Watch. Staff receives four hours of initial training, four hours of semi-annual training, and one hour of quarterly training on suicide prevention. Inmates placed on Suicide

¹⁴ FED. BUREAU OF PRISONS, U.S. DEP'T OF JUSTICE, PROGRAM STATEMENT NO. 5324.08, SUICIDE PREVENTION PROGRAM (Apr. 5, 2007), *available at* http://www.bop.gov/policy/progstat/5324_008.pdf.

Watch are monitored constantly by trained inmates in the Companion Watch Program. There are at least 15 companions serving four hour shifts who are required to not have any low-level disciplinary infractions in the past year and must be vetted by interview.

Additionally, of the 11 DC inmates interviewed during the inspection who required mental health services, nine felt they do not have adequate access to these services and two felt they did. None of the DC inmates interviewed during the inspection reported feeling satisfied about the quality of mental health care. In particular, one inmate reported that his mental health issues have been ignored and that he has never had any interaction with a psychiatrist. One DC inmate requested a visit to the mental health department six months ago and has not yet been seen despite having PTSD and depression. Another DC inmate indicated that his depression medication does not work and that he has had only one contact with the mental health department in the past five months.

Recommendations

5. *Recruit Public Health Service Officers to address the mental health care vacancies at FCI Allenwood and to minimize treatment delays.*

- The CIC received numerous concerns regarding access to mental health services and about the quality of care. The CIC recognizes the serious challenges faced by the FBOP to recruit mental health care professionals. Following the review of the FBOP's medical staffing challenges set forth by the Office of the Inspector General (OIG), the CIC recommends that the FBOP address recruiting challenges in an agency-wide and strategic manner.¹⁵ As stated by the OIG, the U.S. Public Health Service (PHS) provides public health services to underserved and vulnerable populations, which includes inmates housed in the FBOP. The OIG recommended that the FBOP use PHS services as they offer staffing flexibility.¹⁶ Assigning more PHS Officers to address the medical vacancies at FCI Allenwood would assist the facility in providing adequate mental health care and ensure that DC inmates who require mental health services are provided with the appropriate required care.

VIII. Discipline and Administrative Remedies

A. Discipline

Violations of Bureau of Prisons rules and regulations are dealt with by the Unit Discipline Committee (UDC) or the Discipline Hearing Officer (DHO). An incident report is made if a staff

¹⁵ OFFICE OF THE INSPECTOR GENERAL, U.S. DEP'T OF JUSTICE, REVIEW OF THE FEDERAL BUREAU OF PRISONS' MEDICAL STAFFING CHALLENGES (March 2016).

¹⁶ As of September 2014, FBOP was already employing over 800 PHS officers to provide medical care. Id.

member observes or believes an inmate has breached rules and/or regulations. Avenues for the incident report include an informal resolution, an initial hearing with the UDC for low moderate or moderate offenses, or a disciplinary hearing with the DHO for high severity offenses. Initial hearings must be given within five work days of the staff becoming involved, and the UDC must provide its decision by the close of business the next work day. The facility reported fighting, assaults, and narcotics as the three most frequent issues brought before the DHO.

The Unit Team conducts hearings for 300-400 level disciplinary sanctions and may impose sanctions. Alternatively, 100-200 level disciplinary infractions are referred automatically to the DHO. The DHO conducts hearings weekly, but, at the time of inspection, zero DC inmates have been seen in the past six months. Zero DC inmates had cases currently pending. The average length of a Special Investigative Services (SIS) investigation was also unknown because, according to staff, citing variation depends on the case.

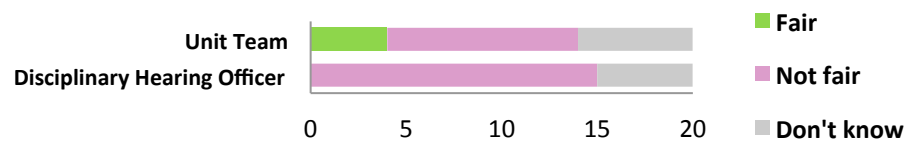
Significant Incidents Table

Facility locked down	0
Inmate suicides	0
Inmate homicides	0
Inmate deaths from natural causes	0
Inmate assault on inmate, with weapon	1
Inmate assault on inmate, without weapon	8
Inmate assault on staff, with weapon	0
Inmate assault on staff, without weapon	6
Inmate attempted assault on inmate, with weapon	0
Inmate attempted assault on inmate, without weapon	1
Inmate attempted assault on staff, with weapon	0
Inmate attempted assault on staff, without weapon	8
Inmate escape from secure facility	0
Inmate escape from non-secure facility	0
Inmate sexual act, non-consensual, on inmate	0
Inmate sexual assault on staff	0
Inmate sexual contact, abusive, on inmate	0
Staff uses of chemicals	14
Staff uses of force	20
Staff uses of restraints	20
Form 583 reports filed by staff (reports to Central Office)	67

Source: Federal Bureau of Prisons. Statistics dated March 2015 to February 2016

The CIC asked DC inmates about the fairness of disciplinary decisions by Disciplinary Hearing Officer (DHO) and the unit team (Figure 3). In many cases, disciplinary actions are first handled by the inmate's unit team before referral to the DHO. Four DC inmates responded that the unit team's decisions are fair, 10 that they are unfair, and six did not know. Zero DC inmates responded that the DHO's decisions are fair, 15 that they are unfair, and five did not know.

Figure 3
Fairness of Disciplinary Decisions



Regarding the disciplinary process, one DC inmate placed a call out for a DHO hearing and stood outside for two and a half hours with nowhere to use a bathroom. The CIC also received reports that the “punishments are too extreme,” specifically that the DHO will take away visitation, commissary, and good time credit in addition to issuing excessive fines. One DC inmate reported that the DHO gives fair punishments and takes money from personal accounts in response to disciplinary infractions.

B. Administrative Remedies

The Administrative Remedy Program allows inmates to seek formal review of issues related to their confinement. The process provides for three levels of review with corresponding filing forms: Facility (BP-9), Regional Office (BP-10), and Central Office (BP-11). At each level, an inmate submits a request or appeal, which is reviewed by FBOP officials and either rejected or filed. All requests or appeals that are filed must be answered within specific time frames, and remedy of the issue may be granted at any level. The tables below provide an overview of the categories with the most numerous administrative remedy filings submitted at each level regarding FCI Allenwood Medium, as well as filings related to the SHU.

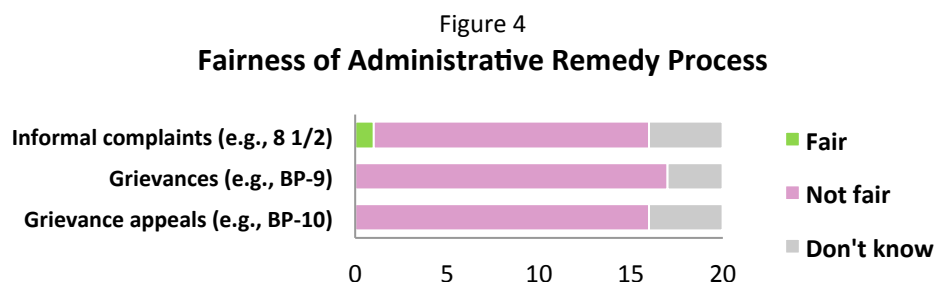
Facility Level (BP-9s)					
	Submitted	Rejected	Filed	Answered	Granted
Staff	100	45	55	53	1
UDC Actions	25	5	20	5	0
DHO Appeals	5	5	0	20	0
Transfer	12	2	10	2	1
Regional Office (BP-10s)					
	Submitted	Rejected	Filed	Answered	Granted
DHO Appeals	254	109	145	28	25
Jail Time	6	3	3	7	1
Sentence Computation	11	5	6	1	0
UDC Actions	14	9	5	5	1
Central Office (BP-11s)					
	Submitted	Rejected	Filed	Answered	Granted
DHO Appeals	51	23	28	0	0
Jail Time	4	2	2	5	2
Sentence Computation	6	3	3	1	0
UDC Actions	1	1	0	0	0

Source: Federal Bureau of Prisons. February 2015 to January 2016.

Administrative Remedy Filings Related to the SHU					
	Submitted	Rejected	Filed	Answered	Granted
BP-9s (facility level)	8	1	7	2	0
BP-10s (Regional Office)	8	4	4	0	0
BP-11s (Central Office)	4	3	1	0	0

Source: Federal Bureau of Prisons. Statistics dated February 2015 to January 2016.

The majority of DC inmates (14 out of 20) reported having used the administrative remedy process at FCI Allenwood Medium. When the CIC asked DC inmates regarding their perception of the fairness of how complaints and grievances are addressed, one stated that the informal complaints are treated fairly, and no DC inmate reported that formal grievances and appeals are treated fairly (Figure 4). Five DC inmates reported not having access to administrative remedy forms.



To understand barriers to using the grievance process, the CIC asked the six DC inmates who have not used the grievance process to provide their reasons why not. Top reasons include that the grievance process does not work and that inmates are afraid of staff retaliation.

During the interviews, DC inmates emphasized repeatedly that the administrative process does not work and that responses to grievance forms never come back in the appropriate amount of time. DC inmates also provided examples of staff retaliation, including DC inmates being put into the SHU for filing a grievance form or for helping another inmate file a grievance. DC inmates also noted that staff charges inmates with fake statements for reports of staff misconduct and staff prevents inmates from filing, either by withholding forms or by giving inmates the “run-around.” One DC inmate could not receive a grievance form while in the SHU.

Recommendations

6. Ensure inmate access to administrative remedy request forms and assess units to determine whether some provide better access to forms than others.

- DC inmates reported not having access to administrative remedy request forms. Following the FBOP’s program statement regarding the administrative remedy program, inmates shall obtain administrative remedy request forms from institution

staff.¹⁷ Providing access to administrative remedy request forms from institution staff would follow the FBOP's policy and afford inmates with a proper opportunity to begin the process. FCI Allenwood Medium should conduct an assessment of all units to guarantee all inmates have the opportunity use the administrative remedy program.

7. *Ensure that the warden responds within 20 calendar days, the regional director responds within 30 calendar days, and the general counselor responds within 40 calendars to administrative remedy requests.*

- The CIC received concerns that most responses to administrative remedy requests are not responded to in a timely manner, if at all. DC inmates who used the administrative remedy program also expressed concerns that administrative remedy requests, particularly those against staff, are either ignored or lost. Ensuring that the warden responds within 20 calendar days, the regional director responds within 30 calendar days, and the general counselor responds within 40 calendars would comply with the FBOP's policy¹⁸ and promote a fair application of the administrative remedy program.

8. *Stress the importance of zero tolerance of staff retaliation or intimidation of inmates who wish to file an administrative remedy, with meaningful personnel consequences for staff who violate the FBOP's objectives.*

- DC inmates reported threats by staff and staff retaliation. Incidents of threats by staff and staff retaliation discourage inmates from using the Administrative Remedy Program. Several courts have held that when a prison official's threats or intimidation inhibits an inmate from using the Administrative Remedy process, the inmate's administrative remedies at the facility are unavailable.¹⁹ The FBOP should stress the importance of zero tolerance of staff retaliation or intimidation of inmates who wish to file an administrative remedy, with meaningful personnel consequences for staff who violate the FBOP's objectives. Such measures will increase transparency and improve efforts to deter staff retaliation and promote the availability for inmates to use the Administrative Remedy process.

9. *Report all claims of threats by staff and staff retaliation for filing an administrative remedy request to OIA, OIG, and BJS.*

- Reporting all claims of threats by staff and staff retaliation for filing an Administrative Remedy Request to the Office of Internal Affairs (OIA), the Office of the Inspector General (OIG), and the Bureau of Justice Statistics (BJS) to ensure the safety of inmates and staff.

¹⁷ FED. BUREAU OF PRISONS, U.S. DEP'T OF JUSTICE, PROGRAM STATEMENT NO. 1330.18, ADMINISTRATIVE REMEDY PROGRAM (Jan. 16, 2014).

¹⁸ Id. at §542.18.

¹⁹ See *Turner v. Burnside*, 2009 U.S. Dist. LEXIS 89488; *Tuckel v. Grover*, U.S.D.C. (D. Col.), Case No. 1:10-cv-00215-KLM-MEH; 2012 WL 5904209.

IX. Special Housing Unit (SHU)

The SHU, often referred to as segregated housing, is designed to securely separate inmates from the general inmate population. The two categories of Special Housing are administrative detention²⁰ and disciplinary segregation.²¹ According to FBOP policy, an inmate may be placed in administrative detention for the following reasons:

- a) Pending classification or reclassification of custody level;
- b) Holdover status while awaiting redesignation to another facility;
- c) Investigation of alleged violation of agency regulation or criminal law;
- d) Awaiting transfer to another facility;
- e) Administrative detention for the inmate's own protection ; or
- f) Post-disciplinary detention.

The SHU at FCI Allenwood Medium is designed to house 145 inmates. At the time of the inspection, staff reported 86 inmates were in the SHU, seven of whom were DC inmates. Inmates in disciplinary segregation and administrative detention were not differentiated. Through follow-up questions, the facility reported that 110 total inmates were in the SHU, 10 of whom were DC inmates. The facility also reported through follow-up questions that nine total inmates were in administrative segregation who were not awaiting disciplinary action, six of whom were DC inmates. In follow-up questions, staff reported that one DC inmate had been in SHU for over a year and that three DC inmates in SHU were diagnosed with a mental health issue. At the time of the inspection, the average length of stay in the SHU was not known.

Staff assignments in the SHU are rotated quarterly. The unit staff, religious services, and education staff conduct rounds weekly. Psychology staff conducts mental health rounds daily, even though only weekly rounds are required. Medical staff conducts rounds usually twice daily. General population education classes are available in the SHU, and books are provided via book carts on the ranges. Inmates also have access to the law library on a first come first serve basis. Priority is given to inmates with cases pending.

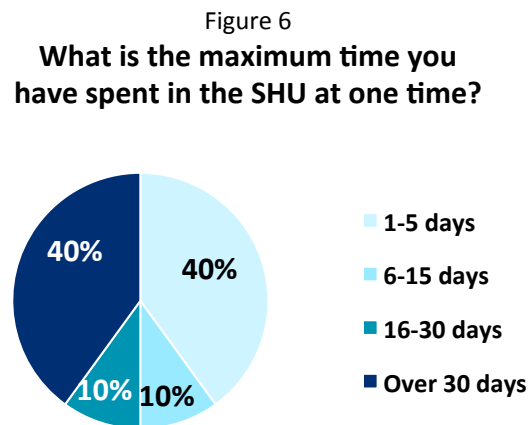
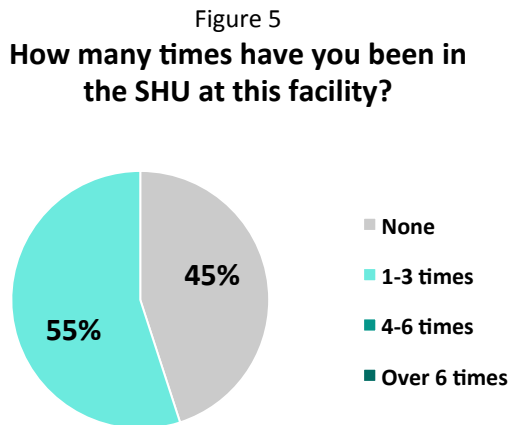
Inmates in the SHU are generally confined to their cells for 23 to 24 hours a day. FBOP policy provides for five hours of recreation time per week, which ordinarily should occur in one-hour

²⁰ FED. BUREAU OF PRISONS, U.S. DEP'T OF JUSTICE, PROGRAM STATEMENT NO. 5270.10, SPECIAL HOUSING UNITS (August 1, 2011)

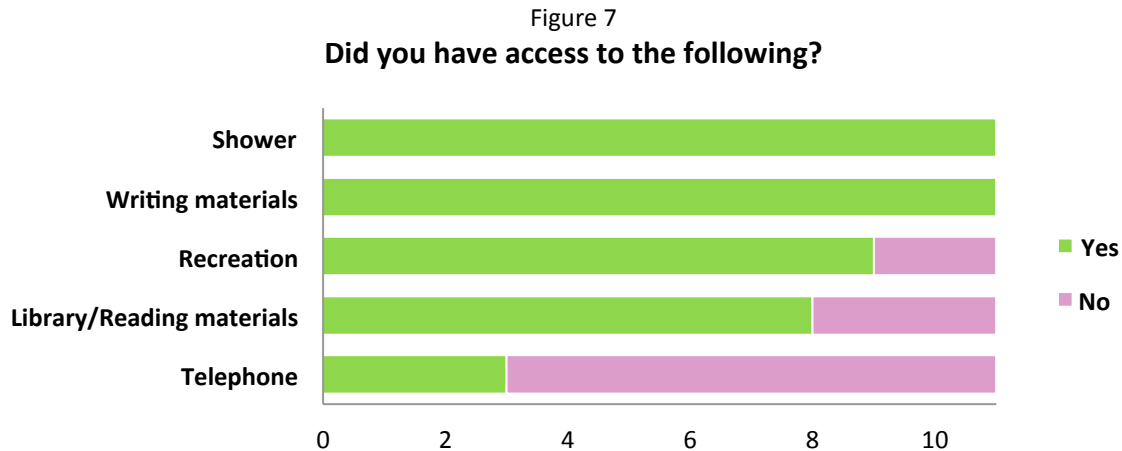
²¹ Disciplinary segregation is imposed as a sanction for violations of FBOP rules and regulations.

periods on separate days.²² Inmates are also permitted to receive one non-contact visit per month and make one 15-minute phone call per month. Inmates may be allowed to make additional calls in the event of an emergency or death. At FCI Allenwood Medium, inmates in the SHU are currently receiving five hours a week for recreation and receive up to five visitors per month and one phone call every 30 days.

Just over half of the DC inmates (11 out of 20) interviewed by the CIC had been in the SHU at FCI Allenwood Medium between one to three times, and none had been in the SHU at the facility for more than three times (Figure 5). Four spent over 30 days in the SHU at one time, one between 16-30 days, one between 6-15 days, and four between 1-5 days, (Figure 6). One DC inmate did not provide data on length of stay.



The majority of DC inmates also confirmed that the chaplain, education department, medical staff, and mental health staff conducted regular rounds in the SHU. All DC inmates reported access to showers and writing materials, and most had access to recreation and reading materials. Three out of the 11 DC inmates had access to the telephone (Figure 7).



²² FED. BUREAU OF PRISONS, U.S. DEP'T OF JUSTICE, PROGRAM STATEMENT NO. 5270.11, SPECIAL HOUSING UNITS (August 1, 2011)

DC inmates reported poor access to medical and mental health care. One DC inmate noted that mental health staff visits every Wednesday, but sick call slips take weeks to respond. One DC inmate who was in the SHU for nine months reported that the head of the SIS told him “You’re going to rot down here” and that the DHO took away his phone and visitation privileges for 16 months. His mattress was taken away from 8AM to 8PM, and he had no radio to participate in programming. One DC inmate reported that he and numerous DC inmates were taken directly to the SHU when they arrived because their central files were not there, and they were kept in SHU for two to three weeks.

Recommendations

In January 2016, President Barack Obama formally adopted the Department of Justice’s (DOJ) recommendations to safely reduce the overuse of restrictive housing.²³ The DOJ issued a report concluding that the practice of restrictive housing should be used rarely, applied fairly, and subject to reasonable constraints.²⁴ Following the “Guiding Principles” as well as the policy recommendation changes directed to the FBOP from the DOJ report, the CIC provides the following recommendations:

10. FCI Allenwood Medium should incorporate developmentally responsive policies and practices for young adults and limit the severe sanctions placed on young adults housed in the SHU.

- One DC inmate who is a young adult reported being in the SHU for nine months and having no phone or visitation privileges, no radio to participate in programming, and mattress restriction from 8 A.M. to 8 P.M. Young adults housed in the FBOP may require special consideration to address the effects of restrictive housing.²⁵ Research has shown that young adults between the age of 18 and 24 have not fully developed a future-oriented method of adult-quality decision-making and are more likely to engage in risk-seeking behavior.²⁶ In providing special consideration for young adults incarcerated at FCI Allenwood Medium, the facility should incorporate developmentally responsive policies and practices for young adults and limit the severe sanctions placed on young adults housed in the SHU.²⁷ The facility should not deprive young adults, or any inmate, from his mattress when he is placed in his cell for 24 hours while also being denied programming and visitation privileges. Such severe sanctions create a cause for concern as to the safety of inmates placed in the SHU at FCI Allenwood Medium.

11. Complete routine disciplinary investigations within seven working days of the filing and all other disciplinary investigations within 30 days of the issuance of an incident report

²³ Available at <https://www.whitehouse.gov/the-press-office/2016/01/26/fact-sheet-department-justice-review-solitary-confinement>

²⁴ U.S. DEPT OF JUSTICE, EXECUTIVE SUMMARY, REPORT AND RECOMMENDATIONS CONCERNING THE USE OF RESTRICTIVE HOUSING (Jan. 2016) (“After extensive study, we have concluded that there are occasions when correctional officials have no choice but to segregate inmates from the general population, typically when it is the only way to ensure the safety of inmates, staff, and the public. But as a matter of policy, we believe strongly this practice should be used rarely, applied fairly, and subjected to reasonable constraints.”)

²⁵ Id.

²⁶ Id.

²⁷ See Id.

(absent compelling circumstances). Require approval by Warden for investigations lasting longer than 30 days.

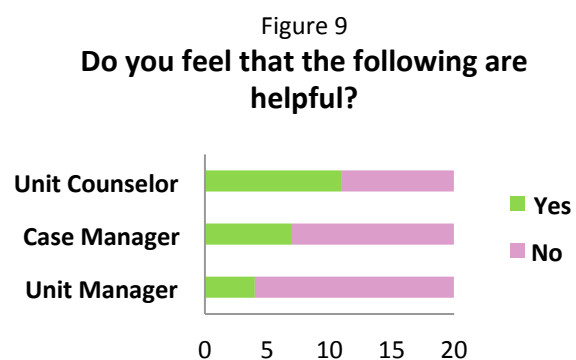
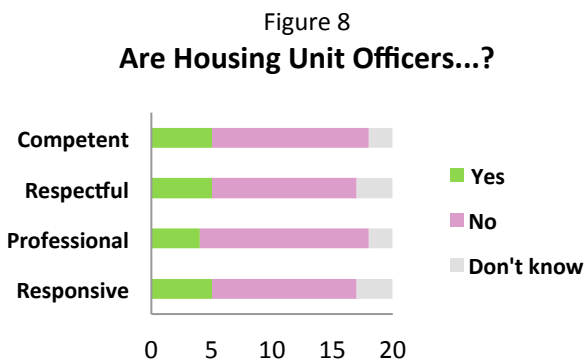
- The CIC received reports from DC inmates who waited long periods of time before seeing the DHO. Since January 2012, the FBOP has reduced its total SHU population by almost 25%.²⁸ While the total SHU population has decreased, the number of inmates in SHU on administrative detention pending an investigation for a FBOP violation has risen 3.45% since 2012.²⁹ Requiring routine disciplinary investigations to be completed within seven working days of the filing of an incident report and requiring all other disciplinary investigations to be completed within 30 days of the issuance of an incident report at FCI Allenwood Medium will help continue the downward trends and further FBOP's efforts to follow the recommendations set forth in the DOJ report.

12. Reduce maximum penalties for disciplinary segregation and impose a sanction of disciplinary segregation only as necessary and only after determining, in writing, that other available sanctions are insufficient to serve purpose of punishment.

- Four DC inmates stated they had spent more than 30 days in the SHU at one time. Reducing the maximum penalties and requiring that the DHO determine, in writing, that other available sanctions are insufficient to serve the purpose of punishment would help ensure FCI Allenwood Medium reduces the total number of inmates in the SHU. This, in turn, will contribute to the downward trends in the FBOP's SHU population.

X. Staff

The CIC received mostly negative responses from DC inmates about the staff at FCI Allenwood Medium. Regarding housing unit officers, over half of all DC inmates reported that these officers are not responsive to their needs, professional, respectful, or competent with fulfilling their job duties (Figure 8). Over half of DC inmates reported that the unit counselor is helpful, seven that the case manager is helpful, and four that the unit manager is helpful. (Figure 9).



²⁸ Id.

²⁹ Id.

Positive commentary from DC inmates includes that several staff members are respectful. One DC inmate reported that his unit counselor is okay so far and provides “8”s. The DC inmate also noted that the case manager is helpful and that some officers show inmates respect.

Negative commentary from DC inmates includes examples of physical abuse, racism, and disrespect. The CIC received an alarming report that officers take inmates to a shack (a building in the middle of the compound) and beat inmates. Additionally, DC inmates commented that staff makes racist jokes and does not attempt to hide racism. Overall, DC inmates expressed difficulty in communicating with staff due to staff’s disrespectful attitude and inability to understand the needs of DC inmates.

Additional concerns include correctional officers smoking in front of inmates, absence of unit team members in the SHU, staff cursing, absence of case manager, and inability to understand DC sentence computation. One inmate remarked that there is only one black case manager, who is in the RDAP unit.

Recommendations

13. Implement a cultural diversity sensitivity training program.

- Numerous DC inmates reported that staff at FCI Allenwood Medium are disrespectful and racist. This concern is significant because, according to FCI Allenwood Medium, 100% of DC’s prisoner population at the facility is black as of January 2016. Working with the National Institute of Corrections, FCI Allenwood Medium can identify training needs and implement a cultural diversity sensitivity training program for staff members to increase awareness of cultures different from their own. Providing staff with such training would further the FBOP’s mission “to protect society by confining offenders in the controlled environments of prisons and community-based facilities that are safe, humane, cost-efficient, and appropriately secure....”³⁰

14. The FBOP should investigate for illegal use of force at FCI Allenwood Medium. FCI Allenwood should monitor the staff to ensure the safety of inmates.

- The CIC received an alarming report that officers take inmates to a shack on the facility and beat inmates. The CIC holds a priority for ensuring the safety for both staff and inmates. The FBOP should investigate for illegal use of force at FCI Allenwood Medium and address these claims. FCI Allenwood should monitor the staff to ensure the safety of inmates.

XI. Institutional Safety

All but one DC inmate reported that they had never been harassed, threatened, or abused by other inmates (Figure 10). The one DC inmate indicated that his mistreatment involved insulting remarks and discrimination based on race, DC residency status, and religion.

³⁰ FED. BUREAU OF PRISONS, U.S. DEP’T OF JUSTICE, [HTTPS://WWW.BOP.GOV/ABOUT/AGENCY/AGENCY_PILLARS.JSP](https://www.bop.gov/about/agency/agency_pillars.jsp).

However, 12 out of 19 DC inmates reported having been harassed, by staff. Figure 11 shows the types of staff harassment reported, the majority of which involved insulting remarks and discrimination based on DC residency status. There were no reports of physical or sexual abuse or discrimination based on offense/crime, sexual orientation, or gang-related issues. DC inmates who indicated “Other” reported discrimination based on age and that staff posted a monkey on a bulletin board to represent DC inmates.



Figure 11
Types of Staff Harassment

TYPE	# REPORTS
Insulting remarks	8
DC residency status	7
Race or ethnic origin	6
Religion/religious beliefs	4
Physical abuse	0
Sexual abuse	0
Offense/crime	0
Gang related issues	0
Sexual orientation	0
Other	6

Of the eight DC inmates who filed reports against staff for harassment, seven were unsatisfied with how it was handled, and one was satisfied. No DC inmate filed a report against other inmates.

Conversations with DC inmates led to discussions regarding staff harassment. According to several DC inmates, staff members make negative comments related to religion; for instance, one staff member asked a Muslim inmate if he had a bomb on him. One DC inmate specified that “there is no such thing as safe when you can’t depend on COs or inmates.”

Five DC inmates reported that they were not told how to report sexual abuse. The majority knew how to report sexual abuse to staff, and less than half of all DC inmates knew how to report via hotlines, to outside service agencies or rape crisis centers, through family, or anonymously. One DC inmate explained that he received information about reporting sexual abuse during an online training.

XII. Reentry

As of January 2016, approximately 22 DC Superior Court inmates were scheduled to be released within 12 months. An additional 38 DC Superior Court inmates will be released within the next 13-59 months. At the time of the CIC inspection, 66.6% of DC inmates received Residential Reentry Center (RRC) time. For 2016, there have been 12 releases for DC inmates, and eight received RRC time. Four DC inmates were excluded due to pending charges or detainers following their period of confinement.

All FBOP facilities follow a Release Preparation Program (RPP) that is intended to prepare inmates for community reentry upon release.³¹ At FCI Allenwood Medium, the RPP consists of a series of classes covering disease prevention and aids awareness, finding and keeping a job, halfway house regulations, requirements of parole officers, personal finances and banking, marriage enrichments, and parenting.

Inmates can participate in the RPP shortly after arriving at the facility. An RPP course calendar is made available to the inmates via their Unit team and the Education Department. Inmates are officially encouraged to participate in the RPP during their initial classification process and subsequent program reviews. Inmates not participating within 30 months of their project release date are subject to refusal status. If inmates have a detainer, they are still required to participate in the RPP, but are exempt from the program if they have an order for deportation. At the time of the CIC inspection, 25 DC inmates were participating in the RPP class, 19 refused, 37 were in the “needs” category, and 8 completed all RPP Program classes.

During the last 11 to 13 months of their sentence, inmates will be enrolled in the Unit RPP, which covers procedures for having clothing sent in for release and specific information necessary for the actual release to a RRC or home confinement.

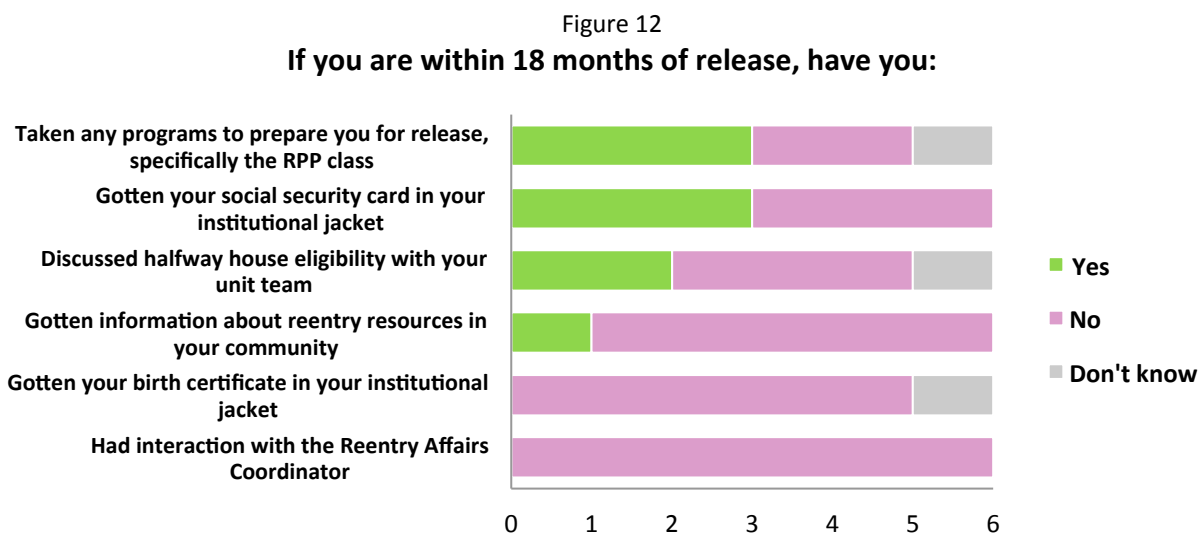
Along with the RPP, FCI Allenwood Medium also assists inmates with obtaining social security cards prior to release. At the time of the CIC inspection, 31% of the DC offenders had a Social Security card.

DC inmates receive reentry support from DC government agencies. The DC Court Services and Offender Supervision Agency (CSOSA) provides a quarterly Community Resource Day for DC inmates in FBOP facilities, including FCI Allenwood Medium. Through videoconferencing, CSOSA staff and representatives from other organizations provide information on housing, healthcare, employment, education, and other resources in the DC area to DC inmates who are within 90 days of release. Inmates also receive an informational package with the contact information of providers who participate in the event. This service ensures that returning citizens receive the information and connection to services necessary for successful reentry.

Of the 20 DC inmates the CIC interviewed, six were within 18 months of release. Half of these DC inmates have participated in reentry preparation programs and half have their social security

³¹ FED. BUREAU OF PRISONS, U.S. DEP'T OF JUSTICE, PROGRAM STATEMENT NO. 5325.07, RELEASE PREPARATION PROGRAM (DEC, 31, 2007).

cards in their institutional jackets. Two DC inmates have discussed halfway house eligibility with their unit team, and one has received information regarding reentry resources in DC. No DC inmate reported having a birth certificate or interacting with the Reentry Affairs Coordinator (Figure 12).



Four out of six DC inmates knew how to access education and employment services post-release, and half knew how to access housing, food, drug treatment, and therapy. Two DC inmates knew how to access medical services and disability benefits.

The CIC spoke to DC inmates who provided their experiences regarding the reentry resources at FCI Allenwood Medium. One DC inmate was familiar with the DC Mayor's Office of Returning Citizens Affairs (MORCA) and will be receiving disability benefits and pursuing GED upon release. Several DC inmates requested additional information regarding reentry programs and employment. One DC inmate commented on the lack of reentry programs available while another commented on his participation in an RPP class as well as access to reentry resources and discussions on halfway house time. One DC inmate noted that he applied twice for a social security card but has not yet received yet and that staff has not told him how to get a birth certificate.

Recommendations

15. Establish a standardized curriculum for the Release Preparation Program (RPP) across all FBOP facilities.

- The CIC commends the FBOP for initiating plans for a standardized RPP curriculum across all FBOP facilities. According to the FBOP Reentry Services Division's Senior Deputy Assistant Director, Patti Butterfield, RPP currently does not have a standardized curriculum. The FBOP should establish a standardized curriculum for the RPP across all FBOP facilities to ensure inmates receive successful preparation for reentry and community resource transition.

16. Provide opportunities for DC agencies and other organization to compile and disseminate reentry resources to DC inmates.

- As planning for the standardized RPP curriculum progresses, the FBOP should also provide opportunities for DC agencies and other organizations to compile and disseminate resources to DC inmates across FBOP facilities. Opportunities may include coordinating with the Reentry Affairs Coordinator to ensure that DC specific resources are readily accessible and up-to-date.

XIII. Employment, Education & Programming

FCI Allenwood Medium offers the following classes taught by staff as well as inmates supervised by staff: GED, ESL, SLN, Vocational Training, Parenting, ServSafe, Apprenticeships, Breaking Barriers, and Job Fair/Resume.

Three out of every four DC inmates interviewed had jobs at the facility (Figure 13). Eight DC inmates were enrolled in academic programs, seven in UNICOR and vocational training, six in a recovery program, and two in a unit program. There were no DC inmates enrolled in a mental health program (Figure 14).

Figure 13
DC Inmate Employment

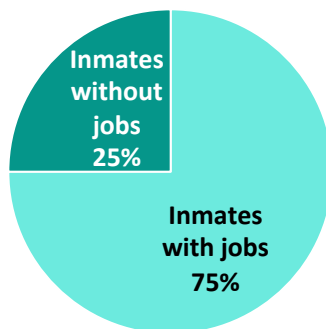
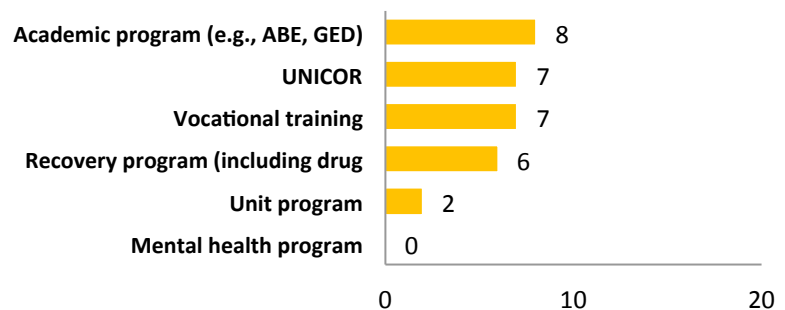


Figure 14
Inmate Participation in Education and Programming



DC inmates reported that it was most difficult to obtain a UNICOR job and least difficult to participate in an academic program (Figure 15). DC inmates also reported average levels of satisfaction regarding unit programs, academic programs, and vocational training. DC inmates were less satisfied with recovery programs, jobs, UNICOR, and especially mental health programs (Figure 16).

Figure 15
Difficulty of Access
(ranked in order)

TYPE	Difficulty Rating (highest = 4)
UNICOR	3.43
Vocational training	2.57
Mental health program	2.45
Recovery program	2.20
Job	2.11
Unit program	1.75
Academic program	1.46

Figure 16
Satisfaction
(ranked in order)

TYPE	Satisfaction Rating (highest = 4)
Unit program	2.78
Academic program	2.73
Vocational training	2.70
Recovery program	2.44
Job	2.38
UNICOR	2.36
Mental health program	1.89

Other comments received regarding programming include difficulty enrolling in a mental health program and concerns about not receiving good time credit. One DC inmate reported that the education department has reached out to the FBOP's Designation and Sentence Computation Center (DSCC) in Grand Prairie, TX to understand DC sentence computation and good time credit.

A. Employment

At the time of the inspection, between 220 and 230 inmates at the facility were employed. Wages ranged from \$0.23 at Grade 5 to \$1.23 at Grade 1. Inmates receive a pay-step increase every 18 months.

At the time of the CIC inspection, FCI Allenwood Medium had a UNICOR factory. During the inspection, however, the CIC was informed that the UNICOR facility at FCI Allenwood Medium would be closing soon, potentially June 2016. According to the FBOP response to this report, the UNICOR factory at FCI Allenwood Medium is still operating, and should continue until 2018. A total of 209 inmates at the facility were employed through UNICOR, 19 of whom were from DC. Inmates are barred from UNICOR if they have a disciplinary segregation within the last six months or threat of deportation. Inmates with two years of less are given priority. Waitlists are used for inmates who have prior experience, are within two years of release, are veterans, and/or have a financial repayment plan. The factory is in operation from 7:30am to 10:30am and from 11:15am to 3:00pm. The factory is also operational during lockdown. Inmates may also receive certifications or apprenticeships in quality assurance and sanitation.

The CIC received feedback regarding employment, including concerns that UNICOR is about to close and will further lengthen the waiting list for employment. Inmates also provided the CIC with examples of job pay ranging from \$13/month as a tutor to \$80/month as an orderly. One DC inmate noted that non-DC inmates receive preference over DC inmates for UNICOR jobs.

B. Education

The Federal Bureau of Prisons requires all individuals who enter FBOP to have a verified high school diploma or GED. Inmates who do not have a high school diploma or GED must attend literacy class for a minimum of 240 hours. FCI Allenwood Medium does not offer Adult Basic Education (ABE) courses. At the time of the CIC inspection, staff from the Education Department reported they conduct an ABE Test Assessment to for the Elementary, Middle, or High School level and reassess on a case-by-case basis. Education classes are offered from 7:30 A.M. – 3:30 P.M.

FCI Allenwood Medium offers a GED preparation course in accordance with FBOP curriculum standards. At the time of the CIC inspection, the facility was not using computers for GED testing. The facility stated they expected to begin using the GED computers in early August. The facility reported having 15 GED computers that would become available. Approximately 17 DC inmates are currently enrolled in the GED class. Eight DC inmates have completed the GED program for all of 2015 and 2016 to date, three have dropped or refused the program for all of 2015 and 2016 to date, and zero are on the wait list.

The facility also offers Adult Continuing Education (ACE) courses. ACE classes at FCI Allenwood Medium are offered at night. At the time of the CIC inspection, the staff reported a total of 250 inmates were enrolled in the ACE program. The facility then reported that 14 DC inmates were enrolled in the ACE program. A total of 1035 inmates completed the ACE program in 2015.

FCI Allenwood Medium offers college correspondence classes that provide college credits to inmates. At the time of the inspection, the Education Department staff was not aware of the costs for participation. Staff reported that one DC inmate was currently taking courses with Blackstone.

DC inmates provided positive input about the education department, stating “I think education is the best part of this prison program” and “The education department is not bad at all. It may be the only thing or place that you can somewhat get what is needed.” One inmate noted that inmates help other inmates in the GED program. Concerns regarding academic programs focused on the need for additional classes. One inmate requested access to the free college programs that other federal institutions are providing.

C. Programming

According to the Inmate Information Handbook, the Education Department at FCI Allenwood Medium offers five occupational training programs: Building Trades Carpentry, Computers, Aquaculture and Heating, Ventilation, and Air Conditioning. For some vocational training programs, a high school diploma or GED is required while, for others, current GED enrollment is required. A GED is required to participate in the Computers training. Five DC inmates are enrolled in vocational programming. Selection into vocational programming is prioritized for

inmates who are closer to their projected release date. Facility staff reported that ServSafe has 16 seats and that enrollment is not chosen by release date. The facility also offers an OSHA program with an outside contractor for warehouse safety that has 20 seats, and enrollment is chosen by release date. The facility also offers a class for flag certification with the Pennsylvania Department of Transportation that follows the national standards. The class has 20 seats and currently has a wait list.

Regarding programming, one DC inmate stated there is only one class for ServSafe and one for flag certification; the DC inmate himself is currently enrolled in a vocational computer certification course. One DC inmate noted that vocational training programs are outdated, and another explained that he is unable to participate in vocational training because he is serving an indeterminate sentence.

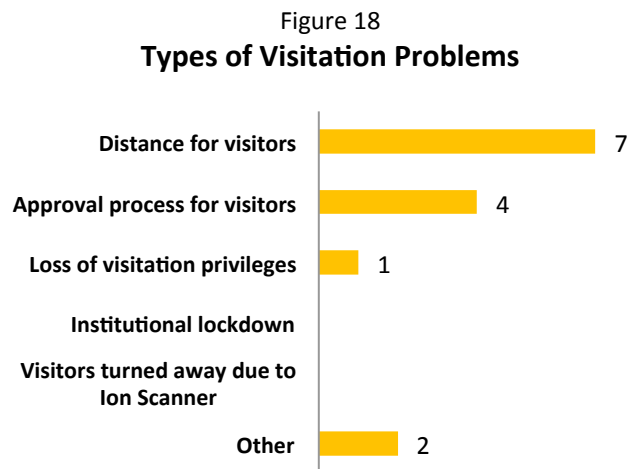
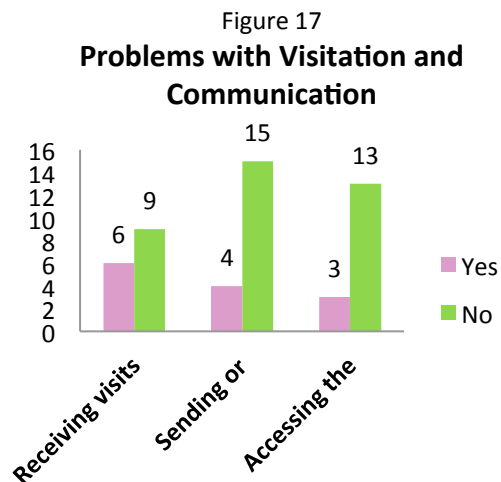
Recommendations

17. Use front number of indeterminate sentence to determine programming eligibility.

- DC inmates have reported difficulty in enrolling in various programs because of eligibility requirements and/or selection is based on an inmate's back number. For reference, inmates sentenced for a crime before 2000 are given an indeterminate sentence, a front number, and a back number. The back number is either life or three times the front number (e.g., 10 to 30 years, or 25 to life). Because these are all parolable sentences, most inmates will be released prior to reaching their back number and as early as their front number. Due to conflicting accounts of this practice between DC inmates and facility staff, the CIC recommends that FCI Allenwood Medium evaluate current practices regarding selection into programs to ensure that DC inmates are not discriminated against and denied participation.

XIV. Communication & Visitation

Most DC inmates did not experience problems regarding visitation, sending or receiving legal mail, or accessing the telephone (Figure 17). Top issues regarding visitation included the distance for visitors, approval process for visitors, and loss of visitation privileges (Figure 18). Inmates did not report issues with institutional lockdown or the Ion Scanner. One DC inmate reported religious discrimination and another that his family could not visit because he was in the SHU.



A. Visitation

Visiting hours are 8:00 A.M. to 3:00 P.M. on Friday, Saturday, Sunday, and federal holidays. There is no local bus transportation to FCI Allenwood Medium. Visiting is limited to five days per month for each inmate. The facility is in the process of offering online video visitation.

Regarding visitation, one DC inmate stated that there is no guarantee that visitors can get in. Another reported that his visitor was denied because the visitor's name was incorrectly spelled. One inmate commented that he does not want his family to have to deal with facility staff for visitation, and another that his visitor was denied even though it involved an identity theft issue.

B. Communication

Mail: Mail correspondence is permitted without prior approval. Mail is distributed Monday through Friday by the Evening Watch Officer in each housing unit. Legal and "Special Mail" is distributed by the Unit Staff as soon as possible after it is received. Legal and "Special Mail" is recorded in a log book to monitor correspondence. Inmates are also permitted to receive publications such as books, newspapers, and magazines with some exceptions. Inmates do not have a limit on the amount of mail they receive, but there is no mail service on weekends and holidays.

Telephones: Inmates must process telephone contacts on the Trulincs computers in the housing units within 30 days of arrival. Inmates are allowed to add or delete contacts, but there is a maximum of 30 active telephone numbers at one time. Inmates are allowed to remove a telephone number and also reactive the phone number by filing a written request. Telephone calls are restricted to 15 minutes or less at the discretion of the Warden. During the week, unit phones are available from 4:30 P.M. to 10:30 P.M. each evening and from 6:00 A.M. to 4:30 P.M. on weekends and holidays. After the inspection, the CIC was told that a 15-minute phone call to DC would cost an inmate \$3.15.

Attorney-Client Communication: Inmates are permitted to have unmonitored phone calls with an attorney, but they must make a verbal or written request to the Correctional Counselor that states

a valid reason why the phone call should be unmonitored, such as a pending court deadline. Mail from attorneys is treated as “Special Mail” if it is marked “Legal Mail - Open Only in the Presence of Inmate” and has the attorney’s name and an indication that she/he is an attorney. In order to visit, attorneys should make an appointment in advance. Meetings with an attorney will be visually monitored but not audio monitored. While the transfer of legal material from an attorney to an inmate is permitted, it is also subject to a search for contraband.

Recommendations

18. Review and update information in the Inmate Information Handbook, specifically update the address listed for the USPC.

- The CIC received a copy of the Inmate Information Handbook before the inspection. In the handbook under the “Contact With the Community and Public” section, the address listed for the United States Parole Commission (USPC) is listed as “5550 Friendship Blvd., Chevy Chase, MD 20815.” FCI Allenwood Medium should review and update information in the Inmate Information Handbook, specifically update the address listed for the USPC to reflect the current address, as of 2011. The current address for the USPC is:

U.S. Parole Commission
90 K Street, N.E., 3rd Floor
Washington, D.C. 20530

19. Ensure that CIC’s Special Mail privileges are followed by staff and listed in the Inmate Information Handbook.

- Following from the CIC’s inspection on April 22, 2016, the CIC received several reports from DC inmates that CIC Special Mail privileges are not being followed and staff at FCI Allenwood Medium opened incoming special mail outside of the inmate’s presence. As stated in the established procedures for FBOP staff to facilitate announced inspections by the CIC:

“On occasion, the CIC may use ‘Special Mail’ privileges under BOP regulations, 28 C.F.R., Part 540, Subpart B, to correspond with specific inmates. As indicated in the regulations, correspondence must be marked ‘Special Mail - Open Only in the Presence of the Inmate.’ Special mail will not be read, although it will be opened in the presence of the inmate, and searched for contraband.”

In accordance with the established procedures, the FBOP as well as the FCI Allenwood Medium executive staff should ensure that CIC’s Special Mail privileges are followed by staff and listed in the Inmate Information Handbook under the “Contact with the Community and Public” section.

XV. DC Specific Issues

DC inmates were nearly unanimous in expressing their desire to move closer to home if given the opportunity. Primary reasons included more opportunities for visitation, increased family engagement and support networks, and a smoother and more successful transition back to DC. The one DC inmate who differed noted that his family now resides in Pennsylvania.

Regarding how staff treats DC inmates in comparison to other inmates, 95% of inmates reported worse treatment while 5% reported equal treatment (Figure 19). When asked whether DC inmates are treated better or worse by other inmates, 47% reported equal treatment, 47% reported worse treatment, and 6% reported better treatment (Figure 20).

Figure 19

Compared to other inmates, how a DC inmates treated by staff?

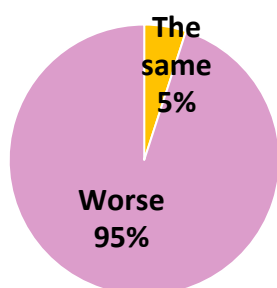
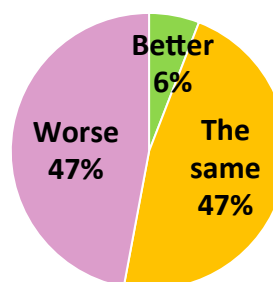


Figure 20

Compared to other inmates, how are DC inmates treated by other inmates?



Specific examples of worse treatment by staff include: DC inmates are stereotyped as “gay or troublemakers,” referred to as “DC Blacks,” penalized for infractions for which other inmates are not penalized, skipped over for programming and employment (such as the Flagger’s Program), “hated” by officers because DC inmates stick together, and told they would be strip searched after seeing the CIC. DC inmates also commented that staff does not know sentence computation for DC inmates. Therefore, DC inmates are not getting their questions answered regarding their sentence computation. Regarding other inmates, DC inmates noted that DC inmates have a bad reputation, and one DC inmate commented that DC inmates treat other inmates from DC better because they stick together.

Recommendations

20. FCI Allenwood Medium should restrict the use of conducting visual searches on DC inmates wishing to interview with the CIC in accordance with FBOP policies.

- During the inspection on April 22, 2016, the CIC became aware that the facility was strip-searching DC inmates after interviews. While the FBOP does not have a Program Statement explicitly referring to a “strip search,” the FBOP provides guidance regarding a visual search for conducting visual inspections of all body

surfaces and body cavities.³² As provided by FBOP's guidance in conducting visual searches, staff may conduct a visual search where there is a reasonable belief that contraband may be concealed or there is a good opportunity for concealment to have occurred.³³ Given that members of the CIC were searched and inspected before entering the facility by facility staff and that the interviews with DC inmates were visually monitored by facility staff, the CIC questions the basis for staff to have reasonably believed that contraband was concealed by CIC members or there was a good opportunity for concealment during CIC's interviews with DC inmates.³⁴

³² FED. BUREAU OF PRISONS, U.S. DEP'T OF JUSTICE, PROGRAM STATEMENT NO. 5521.06, SEARCHES OF HOUSING UNITS, INMATES, AND INMATE WORK AREAS (JUNE 4, 2015).

³³ Id.

³⁴ See Id.

XVI. Appendix

Facility Information: Demographic Characteristics

The table below provides an overview of the demographic characteristics at FCI Allenwood Medium as of January 2016. The information was provided by the facility as part of CIC's document request.

Source: Federal Bureau of Prisons.

Source: Federal Bureau of Prisons.

Total Inmates	1,207
DC Inmates	101

Racial Breakdown (All Inmates)	Total Number	Percentage of Population
Black	734	60.8%
White	466	38.6%
Other	7	0.6%

Racial Breakdown (DC Inmates)*	Total Number	Percentage of Population
Black	87	100%
White	0	0%
Asian	0	0 %
American Indian	0	0 %

Ethnic Breakdown (All Inmates)	Total Number	Percentage of Population
Hispanic	239	19.8%
Non-Hispanic	968	80.2%

Ethnic Breakdown (DC Inmates)*	Total Number	Percentage of Population
Hispanic	0	0%
Non-Hispanic	87	100%

** Demographic characteristics of DC inmates reported for only DC Superior Court Inmates. Does not include individuals sentenced in United States District Court for the District of Columbia.*

Facility Information: Sentencing Information

The table below provides an overview of the sentencing information at FCI Allenwood Medium as of January 2016. The information was provided by the facility as part of CIC's document request.

Inmate Sentence Information (All Inmates)		
Number of inmates with data available	1,200	
Mean sentence (months)	135.2	
Median sentence (months)	96	
Mean time remaining (new law/old law)(months)	59.8/78.1	
Median time remaining (new law/old law)(months)	32/44	
Months to Release (All Inmates)	Number of Inmates	Percentage of Population
0-11 months remaining	2	0.2%
12-35 months remaining	61	5.1%
36-59 months remaining	151	12.6%
60-119 months remaining	420	35%
120-179 months remaining	221	18.4%
180-239 months remaining	116	9.7%
240 months or more remaining	166	13.8%
Life sentences	63	5.3%
Inmate Sentence Information (DC Inmates)*		
Number of inmates with data available	85	
Mean sentence (months)	172.3	
Median sentence (months)	72	
Months to Release (DC Inmates)*	Number of Inmates	Percentage of Population
0-11 months remaining	1	1.2%
12-35 months remaining	9	10.6%
36-59 months remaining	16	18.8%
60-119 months remaining	22	25.9%
120-179 months remaining	5	5.9%
180-239 months remaining	5	5.9%
240 months or more remaining	14	16.5%
Life sentences	13	14.9%
Offenses (All Inmates)	Number of Inmates (1,199 with data)	Percentage of Population
Violent offenders ⁱ	344	28.7%
Drug offenders	545	45.5%
Sex offenders	32	2.7%

Offenses (DC Inmates)*	Number of Inmates (85 with data)	Percentage of Population
Violent offenders ⁱ	36	42.3%
Drug offenders	10	11.8%
Sex offenders	4	4.7%
Inmates With Detainers	Number of Inmates	Percentage of Population
All inmates (1207 with data)	227	18.8%
DC inmates (87 with data)	16	18.4%
Sentence Procedure of DC Inmates	Number of Inmates (85 with data)	Percentage of Population
DC Old Law	8	9.4%
DC 1987 to 1994	7	8.2%
DC 1994 to 2000	9	10.6%
DC Post 2000	57	67.1%
New Law Inmates (SRA, PLRA, and VCCLEA)	4	4.7%

* *Demographic characteristics of DC inmates reported for only DC Superior Court Inmates. Does not include individuals sentenced out of DC District Court.*

ⁱ For the purposes of violent offenders, inmates with the following offense categories are included: Weapons, Explosives, Arson, Homicide, Aggravated Assault, and Kidnapping.

Facility Information: Medical Indicators

Source: ACA audit conducted December 21, 2012. Average daily inmate population for that period: 1,415.

Deaths	
Total deaths, 12-month period	0
Unexpected natural deaths, 12-month period	0
Deaths by suicide, 12-month period	0
Suicide attempts, 12-month period	10
<i>Communicable Disease Indicators</i>	
HIV	
Inmates diagnosed with HIV infection at a given point in time	15
Inmates with HIV infection who are being treated with highly active antiretroviral treatment (HAART) at a given point in time	14
Inmates at a given point in time who have been on antiretroviral treatment for at least six (6) months with a viral load of less than 50 cps/ml	8
Total number of treated inmates with HIV infection that were reviewed	10
Tuberculosis	
Inmates who are new converters on a TB test, indicating new infection within last 12 months	0
Inmates tested for TB in the last 12 months	1,552
Inmates treated for latent TB in the last 12 months	1
Inmates who completed treatment for latent TB in the last 12 months	0
Hepatitis C	
Inmates diagnosed with Hepatitis C at a given point in time	105
MRSA	
Inmates diagnosed with MRSA within the last 12 months	14
Other Health Indicators	
Total number of diabetic inmates reviewed	68
Diabetic inmates at a given point in time under treatment for at least six (6) months with hemoglobin A1C level measuring greater than 9%	9
Completed dental treatment plans within past 12 months	3
Inmates admissions to off-site hospitals	55
Inmates transported off-site for treatment of emergency health conditions	106
Specialty consults completed	1,235
Specialty consults (on-site or off-site) ordered by primary health care practitioners	2,002
Mental Health Indicators	
Inmates diagnosed with an Axis I disorder (excluding sole diagnosis of substance abuse) at a given point in time	197



U.S. Department of Justice

Federal Bureau of Prisons

Washington, DC 20534

JAN 05 2017

Michelle R. Bonner, Esq.
Executive Director
DC Corrections Information Council
2901 14th Street, NW
Washington, DC 20009

Dear Ms. Bonner,

This letter is in response to the draft inspection report received on November 30, 2016, regarding the April 22, 2016, visit to FCI Allenwood. The Bureau of Prisons (Bureau) recognizes the value of the Corrections Information Council (CIC) inspections of its facilities and the voice it provides the D.C. Superior Court inmates. We hope to continue working closely to improve the Bureau facilities and raise awareness with regard to those inmates' needs. I offer the following response to the questions and/or statements in the report:

Factual Clarification:

The draft report indicates: *Currently, there are four six-man cells in each housing unit. During the inspection, the Warden stated the facility plans to convert the six-man cells to three-man handicapped cells within the year.*

Response: An update on this project indicates this conversion is sixty percent complete.

The draft report indicates: *DC inmates reported that the clothes are washed and come back dirty due to the facility using recycled water in the washing machines.*

Response: FCI Allenwood does not use recycled water during any phase of the laundry process.

The draft report states: *If necessary, inmates are sent to Evangelical Hospital in Lewisburg, Williamsboro Hospital, or Danville Hospital. (Williamsboro Hospital should be*

Williamsport Hospital.)

The draft report states: *For the past seven months, the facility only had one Protestant chaplain but has recently hired a Jewish chaplain. Chaplains at FCI Allenwood Medium currently facilitate the Life Connections Program, Bible Study every Monday, and the Threshold Program (upcoming), which is a voluntary non-residential, faith-based reentry program.*

Response: FCI Allenwood currently has the Threshold Program, but there isn't a Life Connections Program.

The draft report states: *"At the time of the CIC inspection, FCI Allenwood Medium had a UNICOR factory. During the inspection, however, the CIC was informed that the UNICOR facility at FCI Allenwood Medium would be closing soon, potentially June 2016."*

Response: The UNICOR factory at FCI Allenwood is still operating, and should continue until 2018.

Recommendations by CIC:

Investigate claims about dirty laundry to ensure efficient and reliable laundry services. The draft report states: *"DC inmates reported that the clothes are washed and come back dirty due to the facility using recycled water in the washing machines."*

Response: FCI Allenwood does not use recycled water in their laundry systems. The system uses fresh water heated to 140 degrees. Laundry is washed with the same brand of detergent used at every Bureau facility. In fiscal year 2016, there were no complaints filed in the Administrative Remedy system by the inmate population. Inmates at FCI Allenwood, are provided with four complete sets of clothing which exceeds the policy requirement. Subsequently, each inmate is able to deposit all institutionally-provided and personally-owned clothing for laundering each week.

Provided inmates don't possess and deposit institutional or personal clothing that exceeds established limitations, all clothing is able to be adequately laundered in the bags provided.

Additionally, inmates are permitted one change of linen per week with a reasonable cleaning schedule applying to blankets. FCI Allenwood affords each inmate the ability to exchange all sheets weekly, and the same ability is afforded to exchange blankets

monthly.

Provide sentence reductions for completing the RDAP to DC inmates who committed their crimes before August 5, 2000 and/or sentenced for a "crime of violence" under D.C. Code § 23-1331(4): The draft report states, "The FBOP should encourage and incentivize DC inmates to enroll in the RDAP to further the FBOP's efforts to address criminogenic needs related to substance abuse and thereby ensuring DC inmates' successful transition back to the community upon release. Due to the nature of their local offenses, many DC inmates do not qualify for the RDAP incentive. The FBOP should provide sentence reductions for completing the RDAP to DC inmates who committed their crimes before August 5, 2000 and/or sentenced for a "crime of violence" under D.C. Code § 23-1331(4).

Response: The FBOP actively encourages all qualifying inmates to participate in the Residential Drug Abuse Treatment Program (RDAP). These programs are locally incentivized at the discretion of the Warden. Some inmates are eligible for a sentence reduction incentive under Title 18 U.S.C. § 3621(e)(2)(B), which allows the Director of the Bureau of Prisons to permit inmates who complete the Residential Drug Abuse Program (RDAP) to receive up to 12 months early release from custody. However, this discretion is limited within the parameters set forth in 28 CFR 550.55(a)(1) and D.C. Code § 24-403.01 for a nonviolent offense. Section 24-403.01 of D.C. Code § 24-403.01 is specific in pertaining only to inmates whose offenses were committed on or after August 5, 2000. The awarding of Good Conduct time to any inmate for completion of the RDAP is in accordance with Title 18, U.S.C. § 3624(b)(4) and 28 CFR 523.20.

Ensure that all areas accessible to inmates are also accessible to inmates with disabilities: The draft report states, "A DC inmate said he could not access most of the equipment in recreation. FCI Allenwood Medium should ensure that all areas accessible to inmates are also accessible to inmates with disabilities. A primary recommendation is to install ramps or elevators for the use of inmates with disabilities. For further guidance, the facility should refer to the requirements under the Rehabilitation Act of 1973 concerning accessibility for disabled persons that are applicable to federal facilities as explained in the "Uniform Federal Accessibility Standards/Fed. Std. - 795, 4/1/88 Edition" (UFAS).11"

Response: In November of 1995 a site survey of FCI Allenwood was

conducted for compliance with the Sensory and Mobility Impaired Accessibility standards. The findings of this survey identified numerous areas throughout the institution needing corrective action. The corrective actions were carried out from July of 1996 through August of 1999. The draft report does not specifically mention the equipment in recreation the inmate could use if there was access. Based on the general recommendation, the Bureau believes FCI Allenwood is in compliance with the Rehabilitation Act of 1973.

Ensure that medically appropriate and adequate meal options and snacks are available, especially for diabetic and chronic care inmates. The draft report states: "DC inmates reported inadequate meal sizes and options for diabetic inmates. DC inmates stated that they are, instead, encouraged to buy food at the Commissary. Because of high prices of commissary food, this alternative is not viable. A primary recommendation is to offer adequate amounts of medically appropriate options at mainline self-selection and directly provide supplemental snacks. Following FBOP policy, FCI Allenwood should ensure that appropriate and adequate amounts of medical diets are available for mainline self-selection. Additionally, health conscious snacks can be provided directly rather than through the Commissary."

Response: Medical diets can be provided by mainline self-selection from the items available on the National Menu for that meal, unless menu items fail to meet the medical requirement. Menu item replacements may not always be provided as inmates may have to avoid certain foods in the self-selection process. However, if a dietitian determines a Special Diet is required to ensure adequate nutrition, it will be provided by pre-plating or controlled plating.

Medical diets are based on the Guidelines for Medical Diets (from the Bureau's Clinical Practice Guidelines). If separate medical diet menus are utilized, the National Menu is used to formulate the diet menus. A Registered Dietitian certifies all medical diet menus.

Supplemental feedings or snacks are provided when ordered by Health Services staff as authorized in the Patient Care policy. The following are provided when practical:

a. Diabetic Snacks

- Preferred Snack: 1 cup skim milk and 1 serving non-sugar-

coated dry cereal.

- Alternate Snacks (when preferred snack is not practical):
- sandwich made with 1 slice of bread and 1 oz. of (non-pork) meat, and mustard (optional).
- 1 Tbsp. peanut butter with 6 saltine crackers or 1 slice of bread.
- 1 oz. slice of cheese with 6 saltine crackers or 1 slice of bread.

b. Snacks for Increased Calories. One of the following is offered:

- 1 cup milk and 1 serving cereal, any type.
- 1 Tbsp. peanut butter with 6 saltine crackers or 1 slice of bread.
- ½ sandwich made with 1 slice of bread and 1 oz. of (non-pork) meat, and mustard.
- Whole sandwich made with 2 slices of bread and 2 oz. of (non-pork) meat, and mustard.

Recruit Public Health Service Officers to address the mental health care vacancies at FCI Allenwood and to minimize treatment delays. The draft report states: "The CIC received numerous concerns regarding access to mental health services and about the quality of care. The CIC recognizes the serious challenges faced by the FBOP to recruit mental health care professionals. Following the review of the FBOP's medical staffing challenges set forth by the Office of the Inspector General (OIG), the CIC recommends that the FBOP address recruiting challenges in an agency-wide and strategic manner. As stated by the OIG, the U.S. Public Health Service (PHS) provides public health services to underserved and vulnerable populations, which includes inmates housed in the FBOP. The OIG recommended that the FBOP use PHS services as they offer staffing flexibility. Assigning more PHS Officers to address the medical vacancies at FCI Allenwood would assist the facility in providing adequate mental health care and ensure that DC inmates who require mental health services are provided with the appropriate required care."

Response: There are no current mental health care vacancies at FCI Allenwood. All inmates at the facility have access to

mental health care as outlined in the inmate Admission and Orientation handbook.

Ensure inmate access to administrative remedy request forms and assess units to determine whether some provide better access to forms than others. The draft report indicates: "DC inmates reported not having access to administrative remedy request forms. Following the FBOP's program statement regarding the administrative remedy program, inmates shall obtain administrative remedy request forms from institution staff. Providing access to administrative remedy request forms from institution staff would follow the FBOP's policy and afford inmates with a proper opportunity to begin the process. FCI Allenwood Medium should conduct an assessment of all units to guarantee all inmates have the opportunity use the administrative remedy program."

Response: The procedures for the Administrative Remedy Program are outlined in the Inmate Admissions and Orientation Handbook and are explained during the Admissions and Orientation lecture. The forms necessary to file an Administrative Remedy form are available during Unit Team open house hours during main line and carried by unit staff during rounds through the SHU. The Bureau is willing to review the allegations made in the draft report, but will need some specific information to assist in any assessment or investigation into the matter.

Ensure that the warden responds within 20 calendar days, the regional director responds within 30 calendar days, and the general counselor responds within 40 calendars to administrative remedy requests. The draft report indicates: "The CIC received concerns that most responses to administrative remedy requests are not responded to in a timely manner, if at all. DC inmates who used the administrative remedy program also expressed concerns that administrative remedy requests, particularly those against staff, are either ignored or lost. Ensuring that the warden responds within 20 calendar days, the regional director responds within 30 calendar days, and the general counselor responds within 40 calendars would comply with the FBOP's policy¹⁸ and promote a fair application of the administrative remedy program."

Response: Inmate grievances are administered in accordance with Program Statement 1330.18, Administrative Remedy Program. Inmates at FCI Allenwood who have concerns with the Administrative Remedy Program should address those issues with their Unit Team or the Executive Assistant, who is the

institution's Administrative Remedy Coordinator. Administrative Remedies are assigned numbers and tracked in a searchable database. The draft report did not provide any specific cases of untimely responses.

Stress the importance of zero tolerance of staff retaliation or intimidation of inmates who wish to file an administrative remedy, with meaningful personnel consequences for staff who violate the FBOP's objectives. The draft response indicated: *"DC inmates reported threats by staff and staff retaliation. Incidents of threats by staff and staff retaliation discourage inmates from using the Administrative Remedy Program. Several courts have held that when a prison official's threats or intimidation inhibits an inmate from using the Administrative Remedy process, the inmate's administrative remedies at the facility are unavailable. The FBOP should stress the importance of zero tolerance of staff retaliation or intimidation of inmates who wish to file an administrative remedy, with meaningful personnel consequences for staff who violate the FBOP's objectives. Such measures will increase transparency and improve efforts to deter staff retaliation and promote the availability for inmates to use the Administrative Remedy process."*

Response: The importance of the Administrative Remedy program is discussed at Annual Refresher Training, Introduction to Correctional Techniques and repeated several times a year during complex department head meetings at FCC Allenwood. The Executive Assistant has made himself available to inmates during mainline to discuss any issues they may have with the program. Further, the Executive Assistant responds to inmates request for assistance with the remedy process through the electronic cop-out system. The Executive Assistant is also the Administrative Remedy Coordinator and speaks to inmates about the administrative remedy program during inmates admission and orientation. All Administrative Remedy forms are assigned a tracking number and are searchable. All staff are provided Annual Refresher training as it relates to Standards of Employee Conduct.

Report all claims of threats by staff and staff retaliation for filing an administrative remedy request to OIA, OIG, and BJS. The draft report indicates: *"Reporting all claims of threats by staff and staff retaliation for filing an Administrative Remedy Request to the Office of Internal Affairs (OIA), the Office of the Inspector General (OIG), and the Bureau of Justice Statistics (BJS) to ensure the safety of inmates and staff."*

Response: FCC Allenwood Executive Staff take all allegations of staff retaliation or misconduct seriously. Allegations of threats made by staff to inmates for any reason are referred for local investigation. When appropriate, the Warden will ensure the complaint is forwarded to the Bureau of Prisons, Office of Internal Affairs for disposition. The Office of Internal Affairs makes the determination of the final disposition of the case.

FCI Allenwood Medium should incorporate developmentally responsive policies and practices for young adults and limit the severe sanctions placed on young adults housed in the SHU: The draft report states, "One DC inmate who is a young adult reported being in the SHU for nine months and having no phone or visitation privileges, no radio to participate in programming, and mattress restriction from 8 A.M. to 8 P.M. Young adults housed in the FBOP may require special consideration to address the effects of restrictive housing. Research has shown that young adults between the age of 18 and 24 have not fully developed a future-oriented method of adult-quality decision-making and are more likely to engage in risk-seeking behavior. In providing special consideration for young adults incarcerated at FCI Allenwood Medium, the facility should incorporate developmentally responsive policies and practices for young adults and limit the severe sanctions placed on young adults housed in the SHU. The facility should not deprive young adults, or any inmate, from his mattress when he is placed in his cell for 24 hours while also being denied programming and visitation privileges. Such severe sanctions create a cause for concern as to the safety of inmates placed in the SHU at FCI Allenwood Medium."

Response: The draft report did not specifically identify the inmate referenced. FCI Allenwood, like all Bureau facilities is governed by the Program Statements 5270.09, Inmate Discipline Program and 5270.11, Special Housing Units. Sanctions are imposed progressively in cases where inmates continue to commit prohibited acts. After an inmate receives an incident report (IR), the inmate will be formally processed by the Unit Disciplinary Committee (UDC). In most cases, if the IR is a Moderate or Low severity level, the UDC will adjudicate the IR and if found guilty, apply the appropriate sanction as outlined by policy. If the IR is a Greatest or High severity level, the UDC makes a preliminary finding and recommends an appropriate sanction to the Disciplinary Hearing Officer (DHO) according to policy. The Bureau is willing to review the allegations made in

the draft report, but will need some specific information to assist in any assessment or investigation into the matter.

Complete routine disciplinary investigations within seven working days of the filing and all other disciplinary investigations within 30 days of the issuance of an incident report (absent compelling circumstances). Require approval by the Warden for investigations lasting longer than 30 days: The draft report states, "The CIC received reports from DC inmates who waited long periods of time before seeing the DHO. Since January 2012, the FBOP has reduced its total SHU population by almost 25%. While the total SHU population has decreased, the number of inmates in SHU on administrative detention pending an investigation for a FBOP violation has risen 3.45% since 2012. Requiring routine disciplinary investigations to be completed within seven working days of the filing of an incident report and requiring all other disciplinary investigations to be completed within 30 days of the issuance of an incident report at FCI Allenwood Medium will help continue the downward trends and further FBOP's efforts to follow the recommendations set forth in the DOJ report."

Response: Program Statement 5270.09, Inmate Discipline Program, states, "Staff conduct the investigation as promptly as possible. The investigating officer is ordinarily appointed within 24 hours of the incident report. The investigation should be finished within 24 hours after the appointment." It further states, "When it appears likely that the incident may involve criminal prosecution, the investigating officer suspends the investigation. Staff may not question the inmate until the FBI or other investigative agency releases the incident report for administrative processing. The incident report should then be delivered to the inmate by the end of the next business day. The time frame for processing the incident report is suspended until it is released for processing." In some cases inmate witness statements are necessary, those statements may take weeks to obtain when the witness inmates are being transferred. It should be noted, the Disciplinary Hearing Officer may postpone or continue a hearing until a later date. A postponement or continuance must be for good cause and documented in the record. Even when an investigation is completed and a transfer to another facility is recommended, it could be a week or more before a transfer request is prepared and submitted based on circumstances. This process can take several weeks along with additional time for transportation arrangements. During this time, the inmate will still be housed in Administrative Detention in the SHU. Bureau facilities

review all the SHU cases weekly to ensure progress is made towards getting these inmates into open/general populations. The Bureau is willing to review the allegations made in the draft report, but will need some specific information to assist in any assessment or investigation into the matter.

Reduce maximum penalties for disciplinary segregation and impose a sanction of disciplinary segregation only as necessary and only after determining, in writing, that other available sanctions are insufficient to serve purpose of punishment: The draft report states, "Four DC inmates stated they had spent more than 30 days in the SHU at one time. Reducing the maximum penalties and requiring that the DHO determine, in writing, that other available sanctions are insufficient to serve the purpose of punishment would help ensure FCI Allenwood Medium reduces the total number of inmates in the SHU. This, in turn, will contribute to the downward trends in the FBOP's SHU population."

Response: Sanctions of Disciplinary Segregation are imposed as a last resort or if the level of severity substantiates the sanction. The DHO imposes Disciplinary Segregation in conjunction with sanctions warranted and within the guidelines of Program Statement 5270.09, Inmate Discipline. Inmates are permitted to appeal those sanctions imposed at the Disciplinary Hearing upon receiving written notice of the sanctions imposed. All inmates receive written notification and justification of the sanctions imposed at the DHO hearing within ten days of the hearing and may appeal those findings within twenty days of receiving the DHO report to the Regional Office. Inmates may appeal the regional findings to the Central Office and until their remedy appeals are exhausted. It should be noted, inmates who have Disciplinary Segregation suspended and have repetitive misconduct during the time of suspension, are imposed the sanction based upon violating the rules of misconduct during the time of the suspension. The Bureau is willing to review the allegations made in the draft report, but will need some specific information to assist in any assessment or investigation into the matter.

Implement a cultural diversity sensitivity training program: The draft report states: "Numerous DC inmates reported that staff at FCI Allenwood Medium are disrespectful and racist. This concern is significant because, according to FCI Allenwood Medium, 100% of DC's prisoner population at the facility is black as of January 2016. Working with the National Institute of Corrections, FCI Allenwood Medium can identify training needs and implement a cultural diversity sensitivity training program

for staff members to increase awareness of cultures different from their own. Providing staff with such training would further the FBOP's mission "to protect society by confining offenders in the controlled environments of prisons and community-based facilities that are safe, humane, cost-efficient, and appropriately secure."

Response: The CIC doesn't point out any specific instances where this type of treatment has occurred short of the inmate comments. The staff at FCI Allenwood receives diversity training annually. New FCC Allenwood employees receive the same diversity training during Introduction to Correctional Techniques. The Bureau will continue working with the National Institute of Corrections to identify classes that could provide training to increase awareness of cultures differences.

The FBOP should investigate for illegal use of force at FCI Allenwood Medium. FCI Allenwood should monitor the staff to ensure the safety of inmates: The draft report states, "The CIC received an alarming report that officers take inmates to a shack on the facility and beat inmates. The CIC holds a priority for ensuring the safety for both staff and inmates. The FBOP should investigate for illegal use of force at FCI Allenwood Medium and address these claims. FCI Allenwood should monitor the staff to ensure the safety of inmates."

Response: The claim that staff take inmates to a "shack" and beat them is without merit and does not occur at FCI Allenwood. Any suspected acts of this nature would be thoroughly investigated in accordance with the Program Statement 3420.11, Standards of Employee Conduct. A review of fiscal year 2016, revealed no claims for such actions by staff at FCI Allenwood. The Bureau is willing to review the allegations made in the draft report, but will need specific information to assist in any assessment or investigation into the matter.

Establish a standardized curriculum for the Release Preparation Program (RPP) across all FBOP facilities: The draft report states, "The CIC commends the FBOP for initiating plans for a standardized RPP curriculum across all FBOP facilities. According to the FBOP Reentry Services Division's Senior Deputy Assistant Director, Patti Butterfield, RPP currently does not have a standardized curriculum. The FBOP should establish a standardized curriculum for the RPP across all FBOP facilities to ensure inmates receive successful preparation for reentry and community resource transition."

Response: The Bureau is in the process of standardizing the curriculum of the Release Preparation Program. As well as including evidence based courses to ensure inmates receive successful preparation for reentry and community resource transition.

Provide opportunities for DC agencies and other organization to compile and disseminate reentry resources to DC inmates: The draft report states, "As planning for the standardized RPP curriculum progresses, the FBOP should also provide opportunities for DC agencies and other organizations to compile and disseminate resources to DC inmates across FBOP facilities. Opportunities may include coordinating with the Reentry Affairs Coordinator to ensure that DC specific resources are readily accessible and up-to-date.

Response: Resources specifically for inmates who are returning to the District of Columbia can be found in hard copy form in the Career Resource Center of the Education Department. In addition, Reentry Coordinators upload electronic versions of reentry resources to TRULINCs (Inmate Electronic Bulletin Board) specifically for inmates who will be returning to the District of Columbia. The following resources are readily available to DC inmates in general population, regardless of their release date:

- 1). Starting Out, Starting Over, Staying Out - A Guide for District of Columbia Ex-Offenders on Housing, Food, Employment and Other Resources
- 2). DC Federal Public Defender Resource Directory
- 3). Supervision and Orientation Handbook from the United States Probation Office for the District of Columbia
- 4). Getting an ID, Office of Returning Citizens
- 5). DC List of Transitional Housing
- 6). DC Hope Village Handbook (Spanish and English Version)
- 7). DC Homecoming Guide
- 8). DC Fatherhood Initiative
- 9). DC Central Kitchen Flyer
- 10). DC Drivers License Information
- 11). DC Directory of Housing Resource
- 12). DC Department of Mental Health
- 13). DC Department of Employment Services
- 14). DC Community Services Information
- 15). DC Adult Directory
- 16). DC Voucher System Information and Job Center
- 17). District of Columbia Child Support Order - Changing an Order

- 18). District of Columbia Birth Certificate Application
- 19). Court Services and Offender Supervision Agency for the District of Columbia, Community Resources Day Video Conference Packet

In addition, inmates who are returning to the District of Columbia are afforded the opportunity to participate in Community Resources Day, Video Teleconferencing with CSOSA quarterly. The Reentry Affairs Coordinators are available to see inmates during mainline and upon arrival during Admission and Orientation (A&O). During A&O, they are also informed that they can send written requests to the Reentry Coordinators for resources. During A&O, all newly arrived DC inmates are informed about Community Resources Day Video Teleconferencing with CSOSA, where to look on TRULINCS for information and about the information located in the Career Resource Center. If there is additional information DC agencies or organizations would like to disseminate through our local institutions, related to reentry resources for DC inmates, please contact the institution's local Reentry Affairs Coordinator and/or the Executive Assistant.

Use front number of indeterminate sentence to determine programming eligibility: The draft report states, "DC inmates have reported difficulty in enrolling in various programs because of eligibility requirements and/or selection is based on an inmate's back number. For reference, inmates sentenced for a crime before 2000 are given an indeterminate sentence, a front number, and a back number. The back number is either life or three times the front number (e.g., 10 to 30 years, or 25 to life). Because these are all parolable sentences, most inmates will be released prior to reaching their back number and as early as their front number. Due to conflicting accounts of this practice between DC inmates and facility staff, the CIC recommends that FCI Allenwood Medium evaluate current practices regarding selection into programs to ensure that DC inmates are not discriminated against and denied participation."

Response: The Bureau doesn't deny access to programs based on release dates. Regardless of parole eligibility, all inmates meet with their Unit Team at a minimum, of every six months to develop a program plan for the inmate during his incarceration. This plan includes work and programming activities to develop skills to make a successful transition back into the community. As the inmate serves his sentence he should be building on these program accomplishments. Inmates eligible for parole will have a parole hearing in advance of their first parole eligibility

date. The examiner will set programming requirements for the inmate to complete prior to them being granted parole. The Unit Team will meet with the inmate to prioritize these programming requirements and have them enrolled to increase the inmate's chances of being approved for the earliest parole date.

Review and update information in the Inmate Information Handbook, specifically update the address listed for the USPC: The draft report states, "The CIC received a copy of the Inmate Information Handbook before the inspection. In the handbook under the "Contact With the Community and Public" section, the address listed for the United States Parole Commission (USPC) is listed as "5550 Friendship Blvd., Chevy Chase, MD 20815." FCI Allenwood Medium should review and update information in the Inmate Information Handbook, specifically update the address listed for the USPC to reflect the current address, as of 2011. The current address for the USPC is:

U.S. Parole Commission
90 K Street, N.E., 3rd Floor
Washington, D.C. 20530

Response: Page 41 of the Inmate Information Handbook has been updated to include the address to the United States Parole Commission. The issue was promptly addressed and a correction notice was placed on the TRULINCS with a notice going out to the inmates signing on to the system.

U. S. Parole Commission
90 K Street, N.E., 3rd Floor
Washington, D.C 20530

Ensure that CIC's Special Mail privileges are followed by staff and listed in the Inmate Information Handbook: The draft reports states, "Following from the CIC's inspection on April 22, 2016, the CIC received several reports from DC inmates that CIC Special Mail privileges are not being followed and staff at FCI Allenwood Medium opened incoming special mail outside of the inmate's presence. As stated in the established procedures for FBOP staff to facilitate announced inspections by the CIC: "On occasion, the CIC may use 'Special Mail' privileges under BOP regulations, 28 C.F.R., Part 540, Subpart B, to correspond with specific inmates. As indicated in the regulations, correspondence must be marked 'Special Mail - Open Only in the Presence of the Inmate.' Special mail will not be read, although it will be opened in the presence of the inmate, and searched for contraband." In accordance with the established procedures,

the FBOP as well as the FCI Allenwood Medium executive staff should ensure that CIC's Special Mail privileges are followed by staff and listed in the Inmate Information Handbook under the "Contact with the Community and Public" section.

Response: Special Mail Procedures are outlined in the Inmate Information Handbook on page 42 under Correspondence. With adequate identification, staff ensure Special Mail is handled according to the policy and procedures outlined in Program Statement 5800.16, Mail Management Manual. The Bureau is willing to review the allegations made in the draft report, but will need some specific information to assist in any assessment or investigation into the matter.

FCI Allenwood Medium should restrict the use of conducting visual searches on DC inmates wishing to interview with the CIC in accordance with FBOP policies: The draft report states: *"During the inspection on April 22, 2016, the CIC became aware that the facility was strip-searching DC inmates after interviews. While the FBOP does not have a Program Statement explicitly referring to a "strip search," the FBOP provides guidance regarding a visual search for conducting visual inspections of all body surfaces and body cavities. As provided by FBOP's guidance in conducting visual searches, staff may conduct a visual search where there is a reasonable belief that contraband may be concealed or there is a good opportunity for concealment to have occurred. Given that members of the CIC were searched and inspected before entering the facility by facility staff and that the interviews with DC inmates were visually monitored by facility staff, the CIC questions the basis for staff to have reasonably believed that contraband was concealed by CIC members or there was a good opportunity for concealment during CIC's interviews with DC inmates."*

Response: Staff may conduct a visual search where there is reasonable belief that contraband may be concealed on the person, or a good opportunity for concealment has occurred. For example, placement in a special housing unit (see 28 CFR 541, subpart B), leaving the institution, or re-entry into an institution after contact with the public (after a community trip, court transfer, or after a "contact" visit in a visiting room) is sufficient to justify a visual search. The visual search shall be made in a manner designed to assure as much privacy to the inmate as practicable.

I appreciate the opportunity to review and provide comments to your inspection report of FCI Allenwood. I hope to continue working closely with the CIC to improve the operations of Bureau facilities and ensure we are meeting the needs of the inmate population.

Please contact me at (202)353-3646 if I can be of further assistance.

Sincerely,

A handwritten signature in cursive script that reads "Scott Finley". The signature is written in dark ink and is positioned above the typed name and title.

Scott Finley, Administrator
Correctional Programs Branch