



March 9, 2023

## **CIC Statement on the BOP's Proposed changes to the Inmate Financial Responsibility Program (IFRP)**

The Bureau of Prisons (BOP) has proposed a change to the Inmate Financial Responsibility Program (IFRP) policy. The DC Corrections Information Council (CIC) is concerned about the financial implications this will have on DC residents in BOP custody and strongly opposes the proposed policy changes.

The amended policy would apply standardized deductions to both an individual's wages and deposits made by loved ones to their account. This standardization will severely limit the funds available to residents without consideration of whether the deductions leave the individual with enough funds to sustain themselves. Requests for adjustments or exceptions to the new deduction method must be done through a staff member and relies on staff discretion for approval.<sup>1</sup> In contrast, under the existing policy, the IFRP places responsibility on unit managers to develop and assess an IFRP payment plan with residents and to determine whether the resident's payments are commensurate with their ability to pay.<sup>2</sup> Also, unless specifically mandated in an individual's Judgement and Commitment Order, DC Code offenders have been permitted by DC Superior Court to pay their financial obligations upon release. While the new policy is voluntary, there are negative repercussions for residents who chose to not participate which can affect the likelihood of them getting parole, preclude them from increased pay opportunities, and will impose a commissary spending limit of \$25 a month.<sup>3</sup>

Furthermore, under the new policy, residents with non-UNICOR jobs are expected to contribute \$25 a quarter to the IFRP, meaning residents would be left with just \$10.80 to \$55.60 a month post deduction.<sup>4</sup> These funds can be used to email, write, or call loved ones. They are also required for medical copays, prescriptions, and purchasing personal hygiene items. For many residents, income alone is not enough to cover these costs, and they rely on outside deposits from loved ones to their accounts. Under the new policy, these deposits are the most significantly reduced source of revenue, with 75% of any deposit from an outside source being diverted to the resident's financial obligations. Loved ones will have to increase their level of financial support to accommodate this new deduction, or the resident will have to sustain themselves with significantly fewer financial resources. The resulting financial insecurity may force residents to use alternative means to sustain themselves while incarcerated, which could violate BOP policies and jeopardize the safety and security of the facility.

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<sup>1</sup> 88 FR 1331

<sup>2</sup> BOP Policy 5380.008

<sup>3</sup> *id*

<sup>4</sup> *id*

The proposed reduction on outside deposits negatively impacts not just those in BOP custody, but also the communities and families financially supporting those incarcerated. While in BOP custody, most individuals earn just 12 to 40 cents per hour for work.<sup>5</sup> Additionally, many earn well below the national poverty line prior to incarceration and will continue to do so upon release, increasing likelihood of recidivism, homelessness, and unemployment.<sup>6</sup> Incarceration further limits an individual's economic prospects, and these effects hinder their children's economic opportunities as well.<sup>7</sup> Financial security and criminal justice involvement are inarguably connected, and the proposed policy change would only serve to exacerbate the financial strain low-income households face in trying to support their incarcerated loved ones.

We strongly urge the BOP to abandon this proposed policy change to maintain the financial stability of incarcerated residents and their loved ones. Instead, we ask that the Bureau continue to defer to the DC Superior court and allow DC residents to address their financial obligations upon release.

Respectfully,

Donald Isaac

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<sup>5</sup> *id*

<sup>6</sup> Adam Looney. "5 facts about prisoners and work, before and after incarceration," Brookings, March 14<sup>th</sup>, 2018, <https://www.brookings.edu/blog/up-front/2018/03/14/5-facts-about-prisoners-and-work-before-and-after-incarceration/>; "Collateral Costs: Incarceration's Effect on Economic Mobility", Pew Charitable Trusts, 2010, [https://www.pewtrusts.org/~media/legacy/uploadedfiles/pcs\\_assets/2010/CollateralCosts1pdf.pdf](https://www.pewtrusts.org/~media/legacy/uploadedfiles/pcs_assets/2010/CollateralCosts1pdf.pdf)