



Office of the Inspector General
U.S. Department of Justice



Review of the Federal Bureau of Prisons' Release Preparation Program

EXECUTIVE SUMMARY

During the past 3 years, the Federal Bureau of Prisons (BOP) released nearly 125,000 inmates from its custody into Residential Reentry Centers (RRC), into home confinement, or directly into communities in the United States. While not all of these inmates will re-offend, analyses of historical data have shown that many of them will. For example, the U.S. Sentencing Commission recently evaluated recidivism rates for federal offenders released in 2005 and found that nearly half of them were re-arrested within 8 years of their release for committing a new crime or for violating their supervision conditions.

To help inmates successfully transition back into the community and to help reduce the likelihood that they will re-offend, the BOP operates, among various reentry efforts, the Release Preparation Program (RPP), which was the focus of this review. The BOP requires every institution to provide an RPP, and most sentenced inmates at BOP-operated institutions are required to participate in the RPP. The RPP consists of classes, instruction, and assistance in six broad categories: (1) Health and Nutrition, (2) Employment, (3) Personal Finance and Consumer Skills, (4) Information and Community Resources, (5) Release Requirements and Procedures, and (6) Personal Growth and Development. The RPP has two segments: the Institution RPP, developed by each **institution's RPP committee based on the general release needs of the institution's inmate population**, and the Unit RPP, **developed by the institution's unit** teams based on the needs of the individual inmate. Inmates must complete both segments for the BOP to consider them to have completed the RPP and to be better prepared for their eventual transition back into society.

This review examines the BOP's **effectiveness in fulfilling the RPP's** established program objectives. These objectives are to enhance **inmates'** successful reintegration into the community through RPP participation; to enter into partnerships with various groups to provide information, programs, and services to releasing inmates; and to reduce inmate recidivism.

Results in Brief

We identified several weaknesses in **the BOP's implementation of** its RPP that **hinder the BOP's** efforts to successfully transition inmates back into the community. These weaknesses include **the BOP's** inability to ensure that RPPs across its institutions meet inmate needs; the low level of RPP completion; **the BOP's** lack of coordination with other federal agencies, such as the U.S. Departments of Health and Human Services and Veterans Affairs, to provide access to services that incarcerated inmates need upon release; and **the BOP's** inability to determine the **RPP's effect on recidivism**.

Significantly, we found that the BOP does not ensure that the RPPs across its institutions are meeting inmate needs. Specifically, BOP policy does not provide a nationwide RPP curriculum, or even a centralized framework to guide curriculum development. Rather, it leaves each BOP institution to determine its own RPP curriculum, which has led to widely inconsistent curricula, content, and quality

among RPP courses. These variations present significant complications to, and have ultimately precluded the BOP from, identifying and measuring the specific effects of RPP courses.

Relatedly, we found that the BOP does not use a systematic method to identify specific inmate needs when determining the curriculum an inmate is to receive. Instead, the institution staff exercises its discretion to determine the inmate's needs, primarily by reviewing the **inmate's Pre-Sentence Investigation Report**, which includes a summary of criminal history and personal information. By comparison, we found that some state correctional departments use assessment tools to **predict an inmate's risk of recidivating**, to better identify factors tied to that risk, and to tailor programming to address those specific risk factors. In addition, BOP institution staffs do not formally collect inmate feedback about RPP courses to ensure their content is relevant. As a result, the BOP does not have an objective and formal process to accurately identify and assess inmate needs or determine which RPP courses are relevant.

We also found that, according to BOP data, less than a third of inmates required to participate in the RPP actually complete the entire program. Moreover, there are often few incentives for inmates to participate and no repercussions for those who refuse or choose not to complete the program. For example, participation in the RPP is usually not a significant factor for determining whether to place an inmate in an RRC.¹ Additionally, we found very limited RPP participation among inmates in Special Housing Units (SHU). Indeed, we could verify only 2 out of the BOP 121 institutions as having complete RPP schedules for their inmates housed in a SHU. BOP officials told us that they did not consider this a problem because they believe that in almost all instances, inmates are not in the SHUs for a long time during their incarceration.

Furthermore, we found that the BOP does not adequately leverage its relationships with other federal agencies to enhance its RPP efforts. Relating to release preparation needs, the BOP currently has only one formal, national agreement with another federal agency that relates to release preparation services, the Social Security Administration, to assist inmates in obtaining services they need upon release. As a result, when inmates need assistance, institutions are left to contact federal agencies on an ad hoc basis at the local level, such as by contacting a local Department of Veterans Affairs office to assist a veteran inmate who needs to reinstate benefits upon release. We believe that improved coordination with other federal agencies at the national level, as part of the RPP before inmates are released, would give inmates timely access to services that would assist them as they reenter society.

¹ The OIG is separately auditing the BOP's management of inmate placement in RRCs. That **audit's** preliminary objectives are to evaluate the BOP's RRC placement policy and practices, RRC capacity planning and management, and performance management and strategic planning regarding utilization of RRCs.

Finally, we found that the BOP does not currently collect comprehensive re-arrest data on its former inmates, has no performance metrics to gauge the RPP's impact on recidivism, and does not currently make any attempt to link RPP efforts to recidivism. We also found that the BOP has not yet completed a recidivism analysis required by the *Second Chance Act of 2007*. Such analyses would help the BOP know whether the RPP is effectively accomplishing its objective of reducing recidivism.

Recommendations

We make seven **recommendations in this report to improve the BOP's RPP** efforts. These include establishing a standardized list of courses to enhance the consistency of RPP curricula across the BOP, using validated assessment tools to assess specific inmate programming needs, using evaluation forms to collect inmate feedback about RPP courses to facilitate improvement, developing and implementing quality controls in RPP courses, exploring the use of incentives and other methods to increase inmate RPP participation and completion rates, engaging with other federal agencies to assess the feasibility and efficacy of establishing national memoranda of understanding to ensure inmates have timely and continuous access to federal services, and establishing a mechanism to assess the **RPP's success in providing** inmates with relevant skills and knowledge that prepare them for successful reentry to society.

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INTRODUCTION

Background

During the past 3 years, the Federal Bureau of Prisons (BOP) released nearly 125,000 inmates from its custody into Residential Reentry Centers (RRC), into home confinement, or directly into the communities in the United States.² In 2015, the BOP reported that, of the 68,695 federal prisoners released during fiscal year (FY) 2013, 11,234 (16.4 percent) recidivated, which means the inmates returned to federal custody within 3 years of release because they had violated the terms of their release or had committed new crimes.³ In a March 2016 study that included all forms of recidivism, not just those resulting in federal re-incarceration, the U.S. Sentencing Commission reported that over an 8-year follow-up period, almost one-half (49.3 percent) of federal offenders released in 2005 were re-arrested for a new crime or a violation of supervision conditions.⁴ Recidivism strains resources and adds to the social costs in communities where the inmates are released; therefore, the BOP and the Department of Justice consider reducing recidivism to be of paramount importance.

According to the BOP, release preparation begins from the time an inmate is admitted into a federal institution and continues throughout incarceration until he or she is **released from the BOP's custody**. Consistent with this approach and to assist inmates in becoming law-abiding citizens when released, every BOP institution **offers a varied set of programs addressing inmate's educational, vocational, cognitive-behavioral, and spiritual needs**, including the Release Preparation Program (RPP), which is the focus of this review. **Among the BOP's reentry efforts, the RPP is a program that the BOP requires every institution to provide, and most sentenced inmates at BOP-operated institutions are required to participate in the RPP.**

The BOP's Release Preparation Program

Federal regulations require the BOP to establish and implement an RPP for incarcerated inmates to prepare them to reenter the community and the workforce

² BOP "Inmate Release" data provided on October 30, 2015. BOP Headquarters officials told us that, in addition to the inmates it released into the United States, it released an additional 63,600 inmates who are not U.S. citizens and thus were deported rather than being released in the United States. An RRC is also referred to as a halfway house or a Community Corrections Center.

³ The BOP recidivism rate excludes inmates released from BOP custody and subsequently returned to custody in local or state correctional jurisdictions. Since the BOP computes its recidivism rate using a 3-year follow-up period for inmates released during a specific fiscal year, **the BOP's FY 2013 data represents the Bureau's most current recidivism rate as of September 30, 2015.**

⁴ U.S. Sentencing Commission, *Recidivism among Federal Offenders: A Comprehensive Overview* (March 2016). The U.S. Sentencing Commission used an 8-year period to measure recidivism, while the BOP uses a 3-year period.

successfully.⁵ The **BOP's** objectives for the RPP are to enhance **inmates'** successful reintegration into the community through RPP participation; to enter into partnerships with various groups to provide information, programs, and services to releasing inmates; and to reduce inmate recidivism.⁶

The **BOP's RPP Program Statement** specifies mandatory participation for all **sentenced inmates committed to the BOP's custody, except for those who are** participating in a study or observation, are sentenced to 6 months or less, are sentenced to death, are confined in an administrative maximum security institution, or are **designated illegal aliens with a "Will Deport Order."**⁷ **An institution's RPP** consists of the Institution RPP and the Unit RPP. Inmates must complete both segments to receive credit for completing the program.

The Institution **RPP entails inmate participation in each of the RPP's six** predefined core categories: (1) Health and Nutrition, (2) Employment, (3) Personal Finance and Consumer Skills, (4) Information and Community Resources, (5) Release Requirements and Procedures, and (6) Personal Growth and Development. **The institution's unit teams, in collaboration with the inmate,** determine which courses the inmate must complete based on personal need and course availability at the institution.⁸ The RPP Program Statement calls for courses to be completed in a classroom setting and to be interactive whenever possible. Typically, institution staff members teach courses in group settings, and most courses are 1-hour long. Institutions may establish relationships with local community volunteers and officials to facilitate events such as mock job fairs and group discussions on topics such as post-release needs and personal growth opportunities. Inmates begin the Institution RPP within 30 months of their release and must complete at least one course in each of the six categories.

The Unit RPP is a series of ongoing counseling sessions in which inmates meet with staff members to discuss and address release planning needs, including but not limited to RRC assignment, post-release supervision, transportation and

⁵ 28 C.F.R. Part 571, Subpart B – Release Preparation Program.

⁶ BOP Program Statement P5325.07, Release Preparation Program, December 31, 2007. Other than the Program Statement, there are no additional criteria or standards for institutions to reference when creating their RPPs.

⁷ Pretrial, state, and non-U.S. citizen inmates are not required to participate in the RPP but **may voluntarily do so with the unit team's recommendation. The same applies to inmates in the BOP's custody who are serving a sentence of less than 6 months. The "study or observation"** exception generally refers to inmates who are in pretrial status and have been ordered by a court to undergo testing to determine mental competence.

⁸ Unit teams are composed of Case Managers, Correctional Counselors, and Unit Secretaries and are overseen by a Unit Manager. Unit management teams interact one-on-one with inmates to determine program needs, monitor program participation, and encourage positive social behaviors within institutions. BOP Program Statement 5321.07, Unit Management Manual (September 16, 1999), recommends that unit teams meet, either individually or in a group setting, with inmates for at least 4 hours per month.

clothing needs, and obtaining identification documents. Staff members collaborate with inmates to determine eligibility for community-based programs and to address potential inmate concerns before release, such as being assigned to an RRC, the disposition of personal property and funds, and transportation arrangements following release.⁹ Typically, inmates begin participation in the Unit RPP within 11 to 13 months of their release.

Roles of BOP Entities in Administering the RPP

Rather than administering a centralized RPP, the BOP requires each institution to plan and implement its own RPP within two broad parameters. First, each institution must have an RPP that includes an Institution and a Unit segment. Second, Institution RPPs must include classes in each of the six core categories discussed above. **Beyond these parameters, the management at each of the BOP's 121 institutions has discretion in how to administer the institution's RPP.**¹⁰ Unlike other BOP programming efforts such as vocational training programs, BOP Headquarters does not allocate the RPP its own budget. The BOP cannot provide cost data for the RPP because expenses associated with the RPP are not itemized in **each institution's** operational budget.¹¹

Role of Individual Institutions in Administering the RPP

The Warden of each BOP institution is responsible for developing and **implementing that institution's RPP. Generally,** Wardens designate an RPP Coordinator and certain institution staff, such as Unit Managers and department heads, to form an RPP Committee. The RPP Program Statement requires the committee, which is chaired by the RPP Coordinator, to determine the general needs of the inmate population, develop and define course offerings, and coordinate program activities.¹² The RPP Committee is required to meet once a year to review the program and identify areas where the RPP needs improvement. The RPP Coordinator develops and then submits the recommended changes to the Warden for approval. The approved Institution RPP is adopted into the Institution Supplement, a local policy statement **that identifies the program's courses and** establishes how the program will operate at the particular BOP institution. BOP

⁹ An RRC is also referred to as a halfway house or a Community Corrections Center.

¹⁰ Although there are currently 122 BOP institutions, we reviewed only 121 institutions because Administrative U.S. Penitentiary Thomson did not begin accepting inmates until June 15, 2015, which was outside the scope of this review.

¹¹ BOP Headquarters officials stated that teaching RPP classes is a collateral duty for institution staff in addition to the regular duties that are assigned to them. They stated that it would be labor intensive to capture the small amount of time that various staff members spend teaching RPP classes.

¹² Department heads serve as subject matter experts within their scope of responsibility at **BOP institutions. Individuals from an institution's Education, Psychology, Business, Social Work, and Health Services Departments** typically compose an RPP Committee.

institution staff members, as a collateral duty, typically present RPP course information to inmates.

BOP institutions track **their inmates'** RPP participation in the **BOP's** SENTRY electronic database.¹³ SENTRY contains preset Case Management Activity codes to monitor inmate participation in RPP classes and seminars. If an inmate participates in education courses outside of the RPP, SENTRY has "Education" codes to document **the inmate's** participation. The RPP Program Statement encourages institutions to use existing programs, such as vocational training, disease prevention classes, and parenting courses to supplement RPP programming efforts.

Roles of Headquarters and Regional Offices in Administering the RPP

Three BOP Headquarters divisions share the role of administering the RPP. The Correctional Programs Division has primary responsibility for overseeing the RPP at the operational level to ensure that the program is carried out as described in the RPP Program Statement. The Reentry Services Division oversees program activities to ensure they are aligned with BOP reentry priorities. The Program Review Division (PRD) audits institutions for compliance with correctional programming standards. With respect to the RPP, PRD staff told us that these audits verify that an institution has a current RPP course calendar and lesson plans, and accurately codes which courses inmates are assigned to take.¹⁴

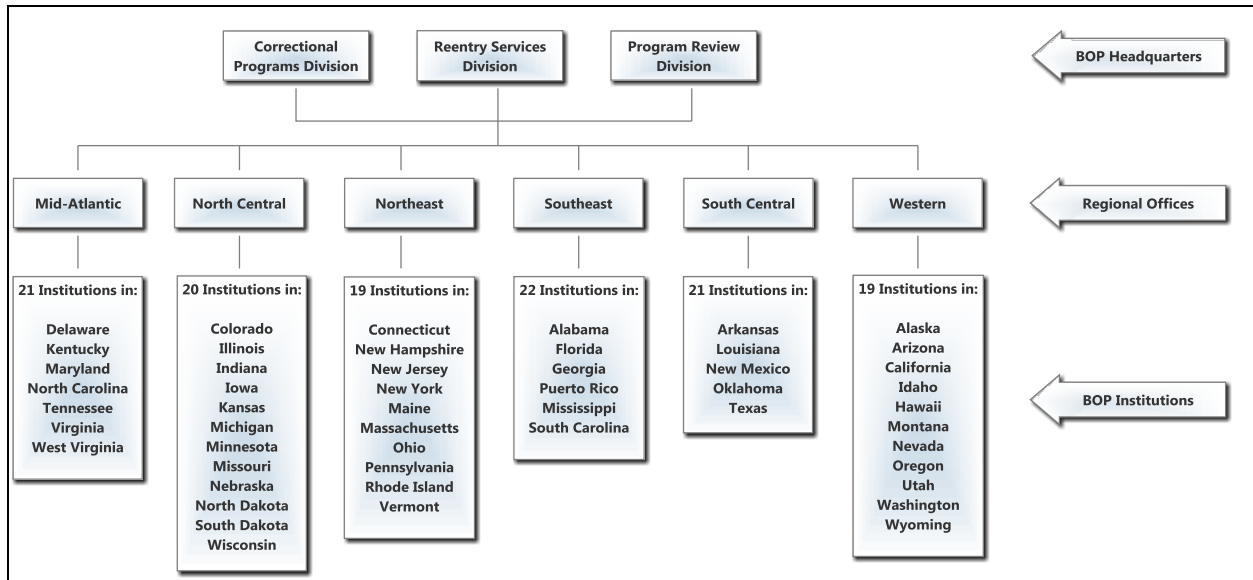
At the local level, BOP Regional Offices provide oversight and support to all institutions in their respective jurisdictions. According to BOP Regional Office staff members, an institution collaborates with its Regional Office during the development of its RPP Institution Supplement to ensure that the Institution RPP's purpose and intent are consistent with its mission. The Regional Office also audits an institution's correctional programming efforts, including the RPP, for compliance with programming standards. Further, Regional Offices collect RPP-related information from institutions in their respective jurisdictions, such as the number of mock job fairs conducted, the number of inmates who participated in mock job fairs, and the number of inmates released with identification cards. Regional Offices send the information to the Reentry Services Division, which compiles the information into Reentry Quarterly Reports for monitoring reentry activities.¹⁵ Figure 1 below shows the BOP entities involved in implementing the RPP.

¹³ **The BOP's SENTRY is** a real-time electronic information system consisting of several applications for processing sensitive but unclassified inmate information. The BOP uses the information to manage the inmate population in areas such as housing and work assignments, sentence computation and implementation, discipline, security classification, and programming needs.

¹⁴ We did not review the PRD audit process or the results of the audits that PRD staff conducted at BOP institutions.

¹⁵ BOP Reentry Quarterly Reports capture trends occurring in established reentry initiatives across BOP institutions. BOP Headquarters officials told us that these reports are used to identify strengths and weaknesses in reentry efforts and to recognize best practices.

Figure 1
RPP Implementation throughout the BOP



Source: BOP

Previous Reviews Related to the Release Preparation Program

Prior to this review, the Office of the Inspector General (OIG) had not specifically reviewed the BOP's RPP.¹⁶ However, the OIG had issued two reports that discuss aspects of RPP.

In March 2004, the OIG issued an audit report on the BOP's release preparation and transitional reentry programs.¹⁷ In that report, the OIG found that the BOP did not maintain statistical data related to RPP participation at institutions to determine program performance. We recommended that the BOP track the percentages of eligible inmates who have completed the RPP and implement a mechanism to hold BOP institutions accountable for RPP performance. In response, the BOP implemented the Inmate Skills Development System (ISDS) and the OIG closed the recommendations on June 23, 2010. We discuss the use of ISDS for the RPP below in our Results of the Review.

In May 2015, the OIG issued a report on the BOP's aging inmate population.¹⁸ In this report, the OIG found that the RPP rarely included courses

¹⁶ The OIG has conducted several audits and reviews of other BOP reentry programming efforts, such as Federal Prison Industries and the management of RRCs.

¹⁷ U.S. Department of Justice (DOJ) OIG, [The Federal Bureau of Prisons Inmate Release Preparation and Transitional Reentry Programs](#), Audit Report 04-16 (March 2004).

¹⁸ DOJ OIG, [The Impact of an Aging Inmate Population on the Federal Bureau of Prisons](#), Evaluation and Inspections Report 15-05 (May 2015).

specifically to address the needs of aging inmates. As a result, we recommended that the BOP develop sections in the RPP that address the post-incarceration medical care and retirement needs of aging inmates. In response, the BOP formed a working group, which, as of January 2016 had identified additional resources to include in the RPP for aging inmates.

Purpose and Scope of the OIG's Review

We assessed **the BOP's effectiveness in meeting the RPP's objectives based on the program's performance measures and the BOP's sufficiency in tailoring the program to meet inmate needs.**¹⁹ We identified aspects of the RPP that may be considered best practices. We **examined the BOP's policies and programs from** fiscal years (FY) 2013 through 2014 in its 121 institutions.²⁰ Our fieldwork, conducted from March 2015 through August 2015, included site visits to seven BOP institutions, interviews with BOP Headquarters and institution staffs, interviews with inmates, data collection and analyses, and document reviews. We also interviewed state correctional executive officials from California, Florida, Georgia, New York, and Texas to gain a perspective on release programs offered to inmates under state custody. A more detailed description of the methodology of our review is in Appendix 1.

¹⁹ For the purposes of this review, the OIG examined only the Institution RPPs.

²⁰ Although there are currently 122 BOP institutions, we reviewed only 121 institutions because Administrative U.S. Penitentiary Thomson did not begin accepting inmates until June 15, 2015, which was outside the scope of this review.

RESULTS OF THE REVIEW

The BOP Does Not Ensure that RPPs across Its Institutions Meet Inmate Needs

We identified several weaknesses in the RPP that prevent the BOP from ensuring that its programming meets inmate needs. Specifically, we found that the curricula, content, and quality of RPP courses are widely inconsistent across BOP institutions; BOP institutions do not systematically assess inmate needs or plan individual programming accordingly; and BOP institutions do not formally collect feedback from inmates to determine whether they find the courses useful.²¹ In addition, we found that a significant number of inmates are released without completing the RPP. We also determined that inmates have limited incentive to participate and that inmates who refuse to participate in the RPP face little to no repercussions. Because of these issues, the BOP cannot ensure that the RPP is adequately preparing inmates for their reintegration into society.

RPP Course Offerings Vary among BOP Institutions

We reviewed BOP policies and the Institution RPP schedules for the **BOP's** 121 active institutions and found that there are no courses that BOP policy requires all institutions to offer and, as a result, no courses are consistently offered at all facilities.²² For example, in the Employment core category, the RPP Program Statement lists resume writing, mock job fairs, and interview skills as possible topics. We found that although those are the most frequently offered courses, resume-writing classes appeared in only 58 percent (70 of 121) of the BOP institutions' RPP schedules, mock job fairs in 55 percent (67 of 121), and interview skills in 47 percent (57 of 121). We also found that 12 percent (14 of 121) of BOP institutions do not provide any of these courses. For example, at one Federal

²¹ A systematic assessment of inmate needs could include using actuarial assessment tools. According to the Colson Task Force for Federal Corrections, an actuarial assessment tool is a statistical method that captures static factors (e.g., age, gender, prior criminal history) related to risk for re-offense and dynamic factors (e.g., substance abuse and employment status) that influence risk and can be addressed through programs and treatment. *Transforming Prisons, Restoring Lives: Final Recommendations of the Charles Colson Task Force on Federal Corrections* (January 2016).

²² On April 25, 2016, Attorney General Loretta Lynch released the *Roadmap to Reentry*, a document that identifies five evidence-based principles to guide federal efforts to improve correctional practices and programs governing inmate release. Principle II states that inmates should be provided various programs that target their criminogenic needs and maximize their likelihood of success upon release. It further states that the evidence-based programs should be standardized across BOP institutions so that an inmate can complete programs even if he or she is transferred to a new facility. Accordingly, the *Roadmap* states that the Department, through the BOP, has begun to assess the **BOP's education, life skills, and job skills programs to ensure these programs** are evidence based and targeted to the criminogenic needs of inmates. DOJ, *Roadmap to Reentry: Reducing Recidivism through Reentry Reforms at the Federal Bureau of Prisons* (April 2016), 3–4. Because the Department launched this initiative so recently, there is insufficient data and information available to assess its results.

Correctional Complex with four co-located facilities, three of the four facilities offered a mock job fair and one did not.²³ None of the four facilities offered a resume writing course or an interview skills course.

We also found that course topics can cover a wide range of subject matters and vary greatly in terms of their apparent practicality. For example, we identified 155 possible topics in the Personal Growth and Development core category with topics as diverse as parenting, anger management, victim impact, music, and arts and crafts. Since inmates are required to take only one course out of each core category, inmates would receive equal credit toward satisfying the RPP requirement if they were to attend an arts and crafts course as they would a victim impact course. While either course may be valuable to the inmate, we find it unlikely that such disparate subject matters should appropriately be treated as substitutes for each other in a program with a specific objective of assisting with the transition back into the community and to reducing recidivism. This is particularly so given that the BOP does not collect data sufficient to measure the effectiveness of these courses in achieving that objective.

Our analysis also showed that 65 of the 155 (42 percent) Personal Growth and Development classes are unique to a single BOP institution. The diverse topics institutions cover, and the unique course content and information different institutions present, create challenges for any assessment of the effectiveness of the overall RPP in the Personal Growth and Development core category, among others. Yet, without reviewing these unique courses and encouraging institutions to offer those found to have wider applicability in preparing inmates for release, the BOP may be missing opportunities to amplify aspects of its RPP that are effective. For that reason we believe the BOP should consider efforts to achieve greater national uniformity in RPP course offerings across institutions.²⁴

The Quality of RPP Classes Is Inconsistent among the BOP Institutions We Visited

During our observations of 16 RPP courses at 6 BOP institutions, we found that the quality of RPP classes was inconsistent in content, length, and format. To gauge the quality of courses offered at different institutions, we observed courses covering behavioral habits, personal finance, personal growth and development,

²³ Federal Correctional Complexes consist of facilities with different security designations. The facility that did not offer the mock job fair was a low security facility, while the other three that did offer the mock job fair were two medium security facilities and one administrative security Federal Medical Center.

²⁴ See Appendix 2 for a more detailed discussion of the patterns and trends we identified in the RPP curricula offered at BOP facilities. We did not include Administrative U.S. Penitentiary Thomson in our review because the facility began operations in June 2015, outside the scope of our review.

release procedures, release gratuity policy, parenting, child support, and a career clinic.²⁵

We found that the quality of the delivery of RPP courses is inconsistent among BOP institutions. For example, the same Personal Growth and Development course lasted 10 minutes at one of the facilities we observed and almost an hour in another. In the former, the instructor ended a 10-minute lecture by encouraging inmates to contact her by e-mail, telephone, or in person during her office hours. We observed that this lecture did not generate any class discussion or questions from inmates while the course was presented. In contrast, the latter course lasted an hour and included an interactive exercise in which attendees participated in various role-playing scenarios that addressed stress management techniques. We noted that inmates attending this course expressed their anxieties about various topics such as probation, seeing their families, being homeless, not being able to deal with stressors, and re-initiating drug and alcohol use. Because of the differences in how the instructors presented the same lesson plan, the latter course covered more information, seemed to more effectively reinforce the course objectives, and allowed inmates to express their anxieties related to release.

We made a similar observation of two classes in Personal Finance at separate BOP institutions. At one institution, the instructor merely read through the handouts for about 20 minutes and the class ended without any of the approximately 20 attendees asking a question. After the session, we spoke with some of the attendees, who stated that they did not feel the topics (such as life insurance and real estate) would apply to inmates' immediate release needs. The Personal Finance class we observed at another institution lasted about 1 hour and included a pre-test with specific questions about course content so attendees could gauge their basic level of knowledge, as well as a video and accompanying workbooks to help them learn the material. We noticed that the inmates in this session actively communicated with the instructor, unlike those in the other Personal Finance class we observed. Because of the striking differences in the delivery of RPP courses we observed, we believe that the BOP cannot ensure that the courses are consistently of a quality high enough to be useful to inmates.

We also found that BOP Headquarters does not consistently assess the quality of RPP classes, nor does it require the institutions to do so. The BOP leaves the decision about whether and how to assess the quality of RPP classes up to the individual institutions. We found that the institutions we visited conduct minimal to no assessments. Because **each institution's RPP** Coordinator is responsible for implementing and managing the RPP, we asked the RPP Coordinators at the six institutions we visited how their institution assesses its RPP program. RPP Coordinators at three of the institutions told us that they did not in any way assess

²⁵ Release gratuities are discretionary funds, up to \$500, that the BOP may provide to inmates upon their release to assist with immediate needs such as transportation, clothing, and food. The BOP grants release gratuities only to inmates it deems eligible for financial assistance.

the quality of the RPP courses because they either lack the staff and resources to do so or because they were unaware of any need to assess the courses. RPP Coordinators at the other three institutions said they assess the quality of the RPP courses by working with community service providers to ensure that course materials are current and/or by randomly observing courses to ensure that the instructors followed the lesson plans. In our judgment, these methods are not thorough or systematic enough to guarantee that institutions can identify and improve low-quality or ineffective classes.

We attribute the inconsistencies in content, length, format, and quality primarily to **BOP Headquarters' limited role in the RPP's** implementation.²⁶ Although the **BOP's** RPP Program Statement states that its intent is to establish a standardized RPP that enables inmates to successfully reintegrate into the community, its only specific requirement in this regard is that each **institution's RPP** curriculum be organized around six broad categories.²⁷ BOP Headquarters officials told us that because the RPP Program Statement requires each institution to establish its own RPP curriculum, BOP Headquarters does not have an active role in the **RPP's implementation**. **Due to the BOP Headquarters' limited role**, we found that some institutions offer courses that BOP Headquarters officials told us they would not consider applicable to the RPP.

This disconnect between the Headquarters and the institutions in establishing a consistent curriculum contributes to the inconsistencies across BOP institutions. For example, we found that some institutions include the Residential Drug Abuse Treatment Program (RDAP) as a part of their RPP even though two BOP Headquarters officials who have roles in administering parts of the RPP stated that this program cannot be included in the RPP. One official stated that the RDAP is a separate program from the RPP. The other official stated that RDAP classes are unique to the RDAP and that inmates are still required to take classes in each of the **RPP's** six core categories. This official told us that RDAP classes are the one group of classes that cannot serve a dual purpose. Likewise, one BOP Headquarters official stated that General Educational Development (GED) classes could be included in the RPP while another official stated that they could not because the GED is its own program, separate from the RPP. Although the **BOP's** decentralized approach for implementing the RPP allows each institution to customize its RPP schedules, we found this approach ultimately does not ensure that inmates receive quality instruction and consistent information.

²⁶ The BOP Headquarters responsibilities include overseeing the RPP at the operational level to ensure that the RPP is carried out as described in the Program Statement, that RPP activities are aligned with BOP reentry priorities, and that Institution RPPs comply with correctional programming efforts.

²⁷ BOP Program Statement P5325.07. The six categories are (1) Health and Nutrition, (2) Employment, (3) Personal Finance and Consumer Skills, (4) Information and Community Resources, (5) Release Requirements and Procedures, and (6) Personal Growth and Development.

To potentially provide more consistent RPP offerings among the institutions, the BOP could make better use of its May 2015 National Programs Directory, which contains 18 evidence-based programs that have been shown to have a positive impact **on an inmate's** rehabilitation.²⁸ Currently, BOP institutions can reference the National Programs Directory when determining which programs and education courses to offer inmates. We found that of the 18 programs listed, 13 programs, such as Adult Continuing Education, parenting, nutrition, and weight management, appear in at least 1 institution's RPP schedule. However, these programs cover only three of the six RPP core categories — Employment, Personal Growth and Development, and Health and Nutrition.²⁹

We believe that an expansion of the National Programs Directory to include evidence-based courses in all six RPP core categories and a requirement for institutions to use these classes exclusively in their Institution RPPs would enable the BOP to improve the consistency and quality of the RPP and would assist the BOP in determining its overall effectiveness. For example, if institutions select courses for their Institution RPP from an expanded National Programs Directory, they would be able to use standardized lesson plans, which would ensure that all inmates receive consistent release preparation information. Separate from the RPP, BOP institutions could incorporate into their programming additional, demographic-specific courses.

We also observed some potential best practices at the institutions we visited that may increase the effectiveness of Institution RPPs. While these practices may not be appropriate for all BOP institutions, they generally assisted those institutions in meeting RPP goals and objectives by facilitating inmate participation, enhancing access to outside employment, and engaging community leaders who support reentry efforts:

- To accommodate inmates with shorter sentences (e.g., less than 9 months), one BOP institution combined courses from three core categories into a single 3-hour session. This allowed inmates to obtain RPP information when they might otherwise not have had time to complete three separate classes.
- Another BOP institution has an electronic kiosk inmates can use to identify potential inmate-friendly job postings nationwide.

²⁸ BOP, *A Directory of Bureau of Prisons' National Programs* (May 2015). This document is also referred to as the BOP's National Programs Directory. The directory focuses on programs in inmate treatment and education. More specifically, for each program included, the directory presents a description, time frame, admission criteria, program content, research showing the results of the program, applicable policies, and institutions where the program is offered.

²⁹ An institution may offer additional Employment, Health and Nutrition, or Personal Growth and Development courses outside of those listed on its RPP schedule. For example, if during an inmate's admission process it was determined that the inmate had health issues related to weight management, the inmate might be scheduled for additional weight management courses offered at the institution.

- To enhance their ability to provide information, programs, and services to releasing inmates through partnerships with various groups, four of six institutions we visited were involved in Community Relations Boards that the institutions had established. The purpose of these boards is to organize information-sharing meetings with community stakeholders such as schools, law enforcement organizations, and local officials such as the mayor. These meetings keep community stakeholders updated on reentry issues and services available to inmates releasing in the local community.

The BOP Does Not Adequately Assess Inmate RPP Needs

The BOP's current method of assessing inmate needs is not systematic compared to the methods of the large state correctional departments whose perspectives we sought as part of this review. In fact, at one of the BOP institutions we visited, a staff member stated that there is no effort at the institution to plan the RPP curriculum based on identified inmate needs. Rather, the RPP courses the unit teams recommend to their inmates are limited to what is already available at the institution. Further, BOP institution staffs do not routinely ask inmates for formal feedback, such as through course evaluations, to determine whether they found individual courses useful and whether their release preparation needs are met. As a result, BOP may not be adequately or accurately assessing the specific needs of inmates.

The BOP Does Not Use Tools that Would Allow It to Systematically Assess Specific Inmate Needs

Many large state correctional departments and local jurisdictions use actuarial assessment tools such as Correctional Needs Assessment, Correctional Offender Management Profiling for Alternative Sanctions, and Next Generation Assessment.³⁰ According to academic studies cited in the Colson Task Force report, these tools are based on a model that captures both static factors related to an inmate's risk of recidivism (e.g., highest school grade completed and age at the time of first offense) and dynamic factors that influence risk (e.g., substance abuse history; family ties; and emotional issues related to depression, anger, and/or loneliness). Once these risk factors are identified, targeted correctional programming can address them.³¹

We interviewed officials from five large state correctional departments to determine how they assess risk and identify inmate needs. We learned that they use actuarial assessment tools, similar to those discussed above, to systematically

³⁰ State correctional departments use the tools identified above for assessing inmate risk and need, which enables them to identify the most appropriate programs to rehabilitate inmates.

³¹ Colson Task Force for Federal Corrections, *Transforming Prisons, Restoring Lives*; Robert D. Morgan, Daryl G. Kroner, and Jeremy F. Mills, *Re-entry: Dynamic Risk Assessment* (March 2012), 9, <https://www.ncjrs.gov/pdffiles1/nij/grants/238075.pdf> (accessed May 5, 2016).

determine **an inmate's** risk of recidivism and identify correctional programs tailored to the **inmate's individual needs** with the hope of reducing re-arrests or re-convictions.³² State officials told us that they are still collecting the recidivism data, so we were unable to determine whether these tools have resulted in lower recidivism rates for these state jurisdictions. However, in a recent report, one of these states found that its assessment tool predicted that inmates with higher risk scores consistently recidivate at higher rates.³³ Research suggests that similar actuarial assessment tools, once validated, can better enable correctional departments to more accurately identify inmates who are at higher risk of recidivating and to curtail that risk by offering inmates the most appropriate correctional programming to meet their specific needs. Furthermore, academic studies have shown that empirically based actuarial assessment tools that predict human behavior are more accurate than professional judgment.³⁴

The U.S. Sentencing Commission has also undertaken a risk factor-based approach to assess which inmates are more likely to recidivate. In a March 2016 report, the U.S. Sentencing Commission used a systematic approach to examine risk factors (sentence type, sentence length, and supervised release length) that contribute to recidivism among federal offenders. The report found that re-arrest rates were higher for those with a history of serious criminal activity (80 percent) compared to those with no history or a minimal history of criminal activity (30 percent). In the same report, the U.S. Sentencing Commission also found that **an offender's age** at the time of release is closely associated with different recidivism rates. Offenders released prior to age 21 had the highest re-arrest rate (68 percent), while offenders over the age of 60 at the time of release had a lower re-arrest rate (16 percent).³⁵ The report further notes that outside of the factors identified above, other factors, such as offense type and education level, also affected the likelihood of recidivism.³⁶

In contrast with the state correctional departments and the U.S. Sentencing **Commission's assessment**, we found that the BOP does not use any actuarial assessment tools or programs to assess specific inmate needs and provide release preparation programming that could potentially lessen the chance of recidivism.

³² The OIG spoke with correctional program officials from the states of California, Florida, Georgia, New York, and Texas.

³³ California Department of Corrections and Rehabilitation Office of Research, *2014 Outcome Evaluation Report* (July 2015).

³⁴ The Colson report references several academic studies. Colson Task Force for Federal Corrections, *Transforming Prisons, Restoring Lives*, 32.

³⁵ Similarly, a 1994 BOP study found that 57 percent of inmates age 25 and younger were re-arrested within 3 years of release as compared to only 15 percent of inmates age 55 and older who were re-arrested. BOP, *Recidivism Among Federal Prisoners Released in 1987* (August 4, 1994), 3, https://www.bop.gov/resources/research_projects/published_reports/recidivism/oreprrecid87.pdf (accessed August 26, 2016). See also DOJ OIG, *Impact of an Aging Inmate Population*, 38.

³⁶ U.S. Sentencing Commission, *Recidivism among Federal Offenders*.

Rather, the **BOP's** method relies on staff discretion that includes a clinical evaluation by a BOP psychologist and assessments by unit teams. These assessments involve reviewing the Pre-Sentence Investigation Report; asking intake questions; and, until recently, using information contained in the Inmate Skills Development System (ISDS), as described in the text box below.³⁷ Reviewing the Pre-Sentence Investigation Report, unit teams may weigh certain factors, such as employment and substance abuse history, type of criminal offense, and whether the inmate is a parent, to determine the types of classes they believe would benefit the individual inmate. **BOP officials told us that they believe the current method "does the best job of assessing risk and needs [of the inmates]."** However, it is **the OIG's** judgment that **the BOP's current** method, which relies heavily on staff discretion to identify and tailor RPP programming efforts to inmate needs, may not be as effective or efficient as the more systematic tools that many state correctional systems use.³⁸

³⁷ A U.S. Probation Officer prepares a Pre-Sentence Investigation Report to provide relevant facts about a defendant; assess the facts in light of the purposes of sentencing; apply appropriate guidelines, statutes, and rules to the available facts; provide clear and concise objectives to assist sentencing judges in determining the appropriate sentence; aid the BOP in making classification, designation, and programming decisions; and assist the Probation Officer during the supervision of the offender's transition into the community. Administrative Office of the U.S. Courts, *The Presentence Investigation Report*, Publication 107 (March 2006).

³⁸ We note that Principle I of the Department's April 2016 *Roadmap to Reentry* states that every inmate should be provided an individualized reentry plan tailored to the inmate's risk of recidivism and programmatic needs. In addition, the assessment of an inmate's recidivism risk and programmatic needs should include a review of the inmate's criminogenic needs, the characteristics, traits, problems, or issues that relate to that person's likelihood to commit another crime. The *Roadmap* further states that the BOP is currently developing a methodology to assess inmates' risk of recidivism and programmatic needs. DOJ, *Roadmap to Reentry*, 3. Because this assessment methodology is still under development, there is no available information or data to evaluate its effectiveness.

The BOP's Phaseout of Its Current, Institution-level Inmate Assessment Tracking System

The BOP is phasing out parts of its current system, ISDS, which BOP institutions use to aggregate and track assessments of inmates that are done by BOP staff in nine essential areas: (1) Academics, (2) Vocational Career, (3) Interpersonal, (4) Wellness, (5) Mental Health, (6) Cognitive, (7) Character, (8) Leisure, and (9) Daily Living. ISDS includes sentencing information, financial obligations, education and work data, discipline history, medical information, and various skill assessments (e.g., interpersonal relations, wellness, cognition, etc.). ISDS is primarily a tracking system; it does not use actuarial or similar data to aid in linking these assessments to a reduced likelihood that the inmate will recidivate.

The BOP instructed its personnel to discontinue filling out all of the information fields in ISDS because the BOP is replacing aspects of ISDS with another system called Insight.³⁹ BOP officials **told us that Insight will enable institutions to better track an inmate's progress in correctional programming and will allow subject matter experts to include feedback about the inmate.**⁴⁰ For example, a subject matter expert in the Education Department could enter his or her perspective **about an inmate into Insight and the inmate's Case Manager could then access the perspective and use it to plan programming.** Insight will also assist BOP personnel in writing progress reports.

Currently, the BOP is piloting Insight at a small number of institutions, so we could not determine its value in its current stage or whether, when fully implemented, it will better assist staff in determining inmate needs.⁴¹ The majority of BOP institutions continue to use ISDS. But, since the staff no longer fills out all of its information fields, only partial information is available for the unit teams, which limits the utility of ISDS in assessing inmate needs.

The BOP Does Not Formally Collect Feedback from Inmates about RPP Courses

We found that while practices at individual institutions may vary, the BOP generally does not require its institutions to obtain formal feedback from inmates. Inmate feedback would help the BOP to assess whether course content and delivery

³⁹ Assistant Director, Reentry Services Division, Operations Memorandum 001-2014 (5860), Guidelines for Discontinuation of Inmate Skills Development System (ISDS) – Phase 1, March 31, 2014, provided guidelines for the first phase of the ISDS discontinuation. The implementation of ISDS had addressed previous OIG audit recommendations related to the BOP tracking the percentages of eligible inmates who have completed the RPP prior to release and establishing and implementing a mechanism to hold BOP institutions accountable for RPP performance. See also DOJ OIG, *Inmate Release Preparation and Transitional Reentry Programs*.

BOP Headquarters officials stated that BOP institution staffs are still required to answer all questions in the Mental Health and Daily Living sections and some questions in the Interpersonal and Wellness sections. However, institution staff is no longer required to enter information in the Academic, Vocational Career, Cognitive, Character, and Leisure sections. Instead, institution staffs in the various inmate services and unit teams maintain this information elsewhere, such as in the SENTRY electronic information system and the Bureau Electronic Medical Records System.

⁴⁰ Subject matter experts are departmental heads at each institution who run programs related to their respective Education, Psychology, Business, Social Work, and Health Services Departments.

⁴¹ On September 9, 2015, the BOP launched the Insight application for the first time at one institution, and as of June 29, 2016, Insight was operating at four institutions. The BOP plans to pilot Insight at six more institutions before implementing it nationwide.

is effective in meeting inmate needs and concerns. Some courses included evaluation forms, but we could not determine how often instructors used them. In the courses we observed, the instructors did not seek formal feedback from inmates. The staff members we interviewed told us that they instead gather feedback through informal discussions with inmates. A staff member told us they believed that inmates would tell them if they liked a class and that this was sufficient to determine whether a course was meeting inmate needs. The majority of inmates we interviewed stated that they did not provide any feedback, nor were they asked to provide feedback about specific RPP courses they had taken or about their overall level of preparation for release.

We asked inmates about their positive and negative experiences with the RPP and whether there was anything the RPP did not offer that they would find useful. The inmates recommended additional instruction on topics such as access to social services and government assistance, interaction with new computer technology, more trade certification programs and apprenticeships, mental health courses, and college preparatory courses beyond the GED.⁴² Their suggestions for additional programming could be of use to the BOP in designing RPP curricula. Some of the **inmates’** positive and negative comments about their experiences with the RPP, which are also potentially useful to the BOP, are in Table 1.

Table 1
Inmate Experiences with the RPP

Inmates’ Perspectives on What Works	Inmates’ Perspectives on What Does Not Work
One inmate offered three positive examples of benefits gleaned from RPP courses: (1) the RPP helped him obtain an HVAC trade certification that could help him get a job after release; (2) a financial self-defense course taught him how to protect himself from fraud; and (3) a parenting class helped him become a better parent.	Instructors tell the inmates what they need to do, but they do not demonstrate what they teach. For example, they said “you need to balance a check book” but never showed how to do it.
Another inmate offered two examples of how RPP courses had assisted her: (1) a parenting class showed her alternatives such as teaching children what they are supposed to do rather than using punishment as the basis for parenting, and (2) a stress management class taught her patience because she used to be very negative and quickly got upset over little things.	Course materials do not apply to the reality inmates will face immediately upon release. For example, a Personal Finance class may cover how to buy a home, but most inmates are unsure of their housing situation after release or may not have plans to buy a home in the immediate future. Also, inmates should obtain credit cards to establish credit; however, former inmates may not be approved for credit cards.

⁴² In DOJ OIG, *Impact of an Aging Inmate Population*, the OIG found that the RPP did not consistently include assistance for inmates who would not be employed after release, e.g., inmates who will be released after retirement age.

Table 1 (Cont'd)

Inmates' Perspectives on What Works	Inmates' Perspectives on What Does Not Work
<p>An inmate believed that the "Living Free" course was very good because it emphasized honesty, respect, and responsibility. It emphasized core values, being drug free, changing from old ways, and accepting certain situations. He realized that he did not have to react emotionally to a difficult situation and can think things through using a value system he learned in the course.</p>	<p>Inmates receive no practical information as to assistance or resources that are available upon release or what to expect upon release, so they must wait until they are assigned to a Residential Reentry Center before they can prepare for release. Career Center resources are outdated, inaccurate, and inadequate for inmates who will be released to a state other than the one in which they are incarcerated.</p>

Source: BOP inmate interviews

Most Inmates Who Are Required to Participate in the RPP Do Not Complete the RPP

The RPP Program Statement mandates that "all sentenced inmates committed to [BOP] custody are to participate in RPP." The BOP believes that successful reintegration into the community requires early identification of the **inmate's release needs and development of a comprehensive institutional and community-based plan** to meet those needs. To receive credit for completing the RPP, inmates must complete both the Institution RPP, which entails taking at least one class in each of the six core categories, and the Unit RPP, which entails ongoing **participation in counseling sessions within the inmate's unit.**

Even though BOP officials told us that the BOP strives for a 100 percent RPP completion rate, we found that of the 46,483 inmates released during FY 2013, only 31 percent had completed both segments of the RPP at the time of their release (see Table 2 below).⁴³ This low completion rate is driven by the fact that only 37 percent of inmates had completed the institution segment of the RPP.⁴⁴

⁴³ BOP RPP assignment data for FY 2013, provided on September 23, 2015. FY 2013 was the most recent year for which complete recidivism data was available at the time.

⁴⁴ According to BOP data, 83 percent completed the Unit RPP. Because the Unit RPP is treated as a mechanism to address release planning needs, such as Residential Reentry Center assignment, transportation, and clothing, the completion rate for this segment of the RPP is higher since all releasing inmates go through an exit process.

Table 2

RPP Completion Rates for the Inmates Released in FY 2013

RPP Program Completion Type	Number of Inmates Released: 46,483	Percent
Number of inmates who completed both Institution and Unit RPPs	14,496	31%
Number of inmates who completed Institution RPP	17,175	37%
Number of inmates who completed Unit RPP	38,699	83%

Source: BOP data

We found the low Institution RPP completion rate particularly surprising given that it is possible to complete this segment of the program in as little as 6 hours, assuming that inmates take a 1-hour class (the typical duration for RPP courses) in each of the six RPP categories. The factors we identified that appear to be contributing to the low RPP completion rate include limited repercussions for inmates who do not participate, no incentives for inmates to participate, and scheduling conflicts. We discuss these factors in more detail below.

Inmates Face Limited Repercussions for Not Participating in the RPP and Have Limited Incentive to Participate

We found that one of the reasons for the low RPP completion rate is that institution officials lack leverage to either require or incentivize inmates to participate. Both BOP Headquarters officials and local institution staff stated that inmates refuse participation in the RPP for two main reasons: (1) there are limited consequences for refusing to participate, and (2) there are no incentives to participate. Some institution staff told us that one of their greatest challenges was getting inmates to “buy into” the RPP. We also found, through interviews, that some inmates were not invested in RPP course offerings because they felt the information presented was not relevant to their individual circumstances.

BOP officials stated that the only repercussion for inmates who refuse RPP participation is that their efforts to move to a less restrictive institution may be affected. **An inmate’s** security classification rating determines the security level in which the inmate is housed. Inmates can improve their security level rating by participating in correctional programming. However, BOP Headquarters officials **stated that RPP participation is a minor factor in the determination of an inmate’s** security classification rating. Other factors, such as age, education level, history of violence, frequency and type of discipline, escape risk, and family ties, have greater influence on the rating.

A more positive way to encourage inmate participation in the RPP would be to establish incentives, such as allowing staff to grant Residential Reentry Center

(RRC) assignments and good conduct time credit to inmates who complete the RPP.⁴⁵ Currently, neither of these options is available. Regarding RRCs, BOP staff members told us that inmates prefer to serve the last portion of their sentence in an RRC, rather than being released directly from prison into the community, because an RRC allows them to gradually rebuild their ties to the community.⁴⁶ In fact, BOP policy previously allowed the BOP to deny RRC placement if an inmate refused RPP participation; but institution staff members told us that the **Second Chance Act of 2007** restricted their ability to deny RRC placement to inmates with poor RPP participation.⁴⁷ Specifically, following the passage of the **Second Chance Act**, the BOP revised the RPP Program Statement to state that inmates who refuse to participate in the RPP “should not be automatically excluded from consideration for [RRC] referral.” We learned that unit teams now have discretion in determining the length of stay at the RRC, up to 12 months as allowed by the **Second Chance Act**, but that they do not have discretion to deny RRC placement outright. The unit team personnel we interviewed told us that shortening RRC assignments does not effectively encourage inmates to comply with RPP course participation because the majority of inmates know they will still receive an RRC assignment of some length.

Another factor that further discourages the BOP staff from using RPP participation as leverage in RRC placement is that the BOP monitors each institution’s RRC utilization rate (the percentage of inmates who are placed in RRCs) to ensure that it is consistent with reporting standards as outlined in the **Second Chance Act**.⁴⁸ One unit team we interviewed stated that to meet the RRC utilization rate, unit teams have to recommend all eligible inmates to RRC assignment regardless of RPP participation.

⁴⁵ The OIG is auditing the BOP’s management of inmate placement in RRCs. The audit’s preliminary objectives are to evaluate the BOP’s RRC placement policy and practices, RRC capacity planning and management, and performance management and strategic planning regarding RRC utilization.

⁴⁶ According to BOP Program Statement 7310.04, Community Corrections Center (CCC) Utilization and Transfer Procedures (December 16, 1998), RRCs provide assistance in job placement, counseling, financial management, and other programs and services to inmates nearing release and facilitate supervising ex-offenders’ activities during their readjustment phase. An RRC may also be referred to as a halfway house or CCC.

⁴⁷ The **Second Chance Act of 2007** requires inmates to be individually considered for pre-release RRC placements using the five-factor criteria from 18 U.S.C. § 3621(b): (1) the resources of the facility contemplated; (2) the nature and circumstances of the offense; (3) the history and characteristics of the prisoner; (4) any statement by the court that imposed the sentence (a) concerning the purposes for which the sentence to imprisonment was determined to be warranted or (b) recommending a type of penal or correctional facility as appropriate; and (5) any pertinent policy statement issued by the U.S. Sentencing Commission.

⁴⁸ The reporting standards outlined in the **Second Chance Act** include: the number and percentage of federal prisoners placed in RRCs during the preceding year, the average length of RRC placement, trends in RRC utilization, reasons why some inmates are not placed in RRCs, and any other information that may be useful in determining whether the BOP is effectively utilizing RRCs.

Some institution staff members we interviewed also believed that the availability of good conduct time credit for completion of the RPP could result in higher participation rates. However, federal regulations and BOP policy preclude good conduct time from being awarded for RPP completion.⁴⁹ With no real incentives available to spur participation and no repercussions for failing to complete the RPP requirement, the BOP is currently falling short of its 100 percent RPP completion goal.

There Are Other Reasons Inmates May Not Fully Participate in the RPP

Some inmates cannot complete the RPP because of scheduling conflicts with medical appointments and special housing assignments. For example, an inmate undergoing treatment for cancer told us that the medical appointments precluded her from attending RPP courses. Although we found that some BOP institutions make an effort to offer make-up courses, there is no guarantee that the make-up courses will be available. Institutions determine RPP course schedules annually, which may be well before conflicts become apparent.

We also found RPP participation among inmates in Special Housing Units (SHU) to be very limited.⁵⁰ BOP officials told us that they did not consider this a problem because in almost all instances, inmates are not in the SHUs for a long time during their incarceration.⁵¹ BOP officials said that institutions generally try to return inmates from the SHU to the general population as soon as possible. On those rare occasions when an inmate cannot be returned to the general population at the same institution, the BOP staff requests priority transfer of the inmate to the general population of a different institution so the inmate may complete the RPP and other classes.

⁴⁹ 28 C.F.R. 523.20 – Good Conduct Time; BOP Program Statement P5884.03, Good Conduct Time Under the Prison Litigation Reform Act (December 5, 2005).

Aside from good conduct time, we found that the BOP incentivizes inmates who complete the RDAP. Under BOP policy and pursuant to 18 U.S.C. § 3621(e), BOP inmates may have, at the **discretion of the BOP's Director, a sentence reduction of up to 12 months if they complete the RDAP.** In order for BOP inmates to be eligible for early release, they must have a substantiated diagnosis for a substance use disorder, have been sentenced to a term of imprisonment for a nonviolent offense, and have successfully completed the RDAP.

⁵⁰ SHUs are alternative housing units that securely separate inmates from the general population. In a SHU, inmates may be housed alone or with other inmates. For this review, we did not independently verify the extent to which SHU assignments interfere with RPP completion.

⁵¹ It is beyond the scope of this review to verify the length of time inmates actually spend in the SHU; however, according to an independent report on SHUs, inmates housed in the SHU are there for an average of 76 days. CNA Analysis and Solutions, *Federal Bureau of Prisons: Special Housing Unit Review and Assessment* (December 2014). According to FY 2014 data the BOP provided to us, 780 inmates had been housed in the SHU for more than 150 days, 41 inmates for more than 500 days, and 6 inmates for more than 1,000 days. As of July 6, 2016, 276 inmates had been housed in the SHU for more than 180 days and 57 inmates had been housed for more than 364 days.

We analyzed RPP offerings to inmates housed in SHUs from two sources: RPP schedules the BOP provided to us and information obtained during our site visits. In our analysis of RPP schedules from the **BOP's** 121 operational institutions, we found that only 4 institutions had RPP schedules specifically tailored for inmates housed in the SHU. Only two of the four SHU RPP course schedules we reviewed contained at least one course in each of the six core categories. Of the remaining two SHU course schedules, one offered courses in only two of the six core categories (Employment and Personal Finance and Consumer Skills) and the other offered courses in three of the six core categories (Employment, Personal Finance and Consumer Skills, and Personal Growth and Development). This means that we could verify only 2 out of the 121 institutions as having complete RPP schedules for their inmates housed in SHUs.

We also assessed RPP offerings in the SHUs at the six institutions we visited and found that **the program's** availability to inmates varied.⁵² Three of the six institutions we visited did not offer any RPP programs to inmates housed in SHUs. The other three facilities told us that inmates housed in SHUs receive RPP courses through written materials or videos. At one of the institutions that provided course materials, the staff explained that SHU inmates generally participate in the RPP by studying independently rather than through classes with groups of inmates. In "self-study," the staff provides reading materials to inmates on various subjects, some of which apply to the RPP. These include adult continuing education, parenting, job search information, GED, English as a Second Language, and post-secondary education and correspondence courses. SHU inmates review the materials and complete the workbooks at their own pace. The BOP staff then collects the materials and workbooks and provides feedback to the inmate while making weekly rounds. Because some inmates cannot fully participate in the RPP, the BOP cannot ensure those inmates are as well prepared to reenter the community as the BOP could help them to be.

The BOP Does Not Fully Leverage Its Relationships with Other Federal Agencies to Enhance RPP Efforts

Partnerships with other federal agencies to address release preparation issues is of paramount importance because partnerships would enable the BOP to provide broader access to services and resources that could enhance the RPP's capacity to prepare inmates for release.⁵³ The former BOP Director recognized that,

⁵² These six BOP institutions that the OIG visited are not the same four institutions that provided the OIG with RPP schedules specifically tailored for inmates housed in SHUs.

⁵³ Principle V of the *Roadmap to Reentry* states that before leaving custody every inmate should be provided comprehensive reentry-related information and access to resources necessary to succeed in the community. DOJ, *Roadmap to Reentry*, 5.

In April 2016, the BOP published a reentry handbook containing information about services and resources that are available to releasing inmates as well as checklists for inmates to use as they prepare for release and after they are released from BOP custody. BOP, *Reentering Your Community: A Handbook*, April 2016.

to further enhance focus and efforts on reentry, the BOP must work closely with other federal agencies and stakeholders to develop partnerships and leverage resources to aid in offender reentry.⁵⁴ Additionally, the BOP's RPP Program Statement says that the BOP will enter into partnerships with other federal agencies to provide information, programs, and services to releasing inmates.⁵⁵

We found that the BOP has only one national memorandum of understanding (MOU) to provide limited release preparation services to inmates residing in all BOP institutions. This MOU is with the Social Security Administration (SSA), to assist inmates in obtaining replacement Social Security cards upon release.⁵⁶ It supports **the BOP's goal for inmates to have** at least one form of identification at the time of their release to use as proof of eligibility for work programs and/or veterans benefits. The MOU applies to all inmates who are U.S. citizens and will be released from a BOP institution into the community, an RRC, or to another detaining authority. All BOP institutions and SSA field offices with BOP institutions in their servicing area are responsible for delivering the services outlined in the MOU.⁵⁷

Except for this partnership with the SSA, which addresses only one potential release preparation issue, individual BOP institutions are left to contact local offices of federal agencies to provide inmates with access to services related to release preparation. We found that BOP institutions in some localities have taken the initiative to establish partnerships with local offices of the U.S. Department of Veterans Affairs and U.S. Probation Office to provide federal benefit services to qualifying veteran inmates and release information to inmates assigned to a term of supervised release following incarceration. These partnerships typically entail federal agency representatives presenting information at the institution about their **agency's services so that inmates can** avail themselves of the services in preparation for release.⁵⁸

⁵⁴ Charles E. Samuels, Jr., former BOP Director, before the Homeland Security and Government Affairs Committee, **U.S. Senate, concerning "Oversight of the Bureau of Prisons: First-Hand Accounts of Challenges Facing the Federal Prison System"** (August 4, 2015), http://www.bop.gov/resources/news/20150805_director_testifies.jsp (accessed November 24, 2015).

⁵⁵ BOP Program Statement P5325.07, Program Objective B.

⁵⁶ BOP officials told the OIG that, in addition to the current national MOU, the BOP and the SSA are developing another MOU that will allow inmates to apply for Social Security benefits while incarcerated. As of May 10, 2016, the BOP expected that both agencies would sign the MOU on September 30, 2016. BOP officials told us that the BOP is not developing any other national-level projects with federal agencies, such as the Departments of Veterans Affairs, Housing and Urban Development, or Health and Human Services, which could provide benefits to which inmates may be entitled upon release.

⁵⁷ MOU between the SSA and the BOP enabling inmates to secure replacement Social Security cards upon release, November 13, 2012.

⁵⁸ During the course of our review, we found multiple examples of BOP institutions forming partnerships with local/state child support service agencies; however, because of the wide variation in

(Cont'd.)

While we recognize the value of individual institutions forming local partnerships to best serve the needs of their inmate populations, we believe that relying almost exclusively on institution-specific partnerships to provide services has substantial downsides. One downside is that it places a burden on institutions to identify, initiate, and facilitate potential federal partnerships at the local level that could be more efficiently accomplished with a national MOU. For example, at one institution we visited, the Reentry Affairs Coordinator (RAC) stated that a lack of formalized agreements for programs poses a challenge to continuing community partnerships during staff turnover.⁵⁹ At this institution, the new RAC had to rebuild relations with a community organization that years before had provided an inmate mentoring program. Because the program **was based on the previous RAC's** personal relationship and not part of a formal agreement, the program was discontinued when the previous RAC left and the position was not filled for a year. This staff member also told us that formalized agreements can be valuable in enhancing the robustness of a program. Although this was not a partnership among federal agencies, we recognize this as a case in which formal agreements can increase the sustainability of correctional programs.

Another downside of relying on institution-specific partnerships is that the **sustainability of partnerships is contingent on the partnering agency's level of** commitment and amount of resources devoted to services rendered. BOP staff at one institution told us that they had an informal agreement with a local SSA office to come into the institution and present a seminar to inmates about disability benefits and other services. However, the agreement between the BOP institution and the local SSA office was abruptly discontinued due to limited staff and financial resources. Because this partnership had come to an end, BOP staff at the institution had to take it upon themselves to present the seminar to the inmates. One institution staff member and several inmates told us that inmates are more receptive to information presented by a subject matter expert, such as the SSA representative, as opposed to a BOP staff member. While we recognize the initiative of the institutions that implemented their own solutions for their inmates, we believe that a more active role by BOP Headquarters in establishing national MOUs to provide consistent information and services would assist in ensuring inmates are better prepared to reenter society.

state and local resources available to institutions, we discuss only partnerships between the BOP and federal agencies that can be replicated across the BOP.

⁵⁹ The RAC is a relatively new position tasked with developing partnerships with external agencies to facilitate reentry objectives and to supply information and resources to offenders to assist in their reentry into the community. RACs also collaborate with each other to share information.

To reduce the need for institutions to create partnerships at the local level, the BOP could take advantage of its memberships in national reentry forums to develop national MOUs that would enable all inmates to have consistent access to information and services as covered in the MOU. One such forum is the Federal Interagency Reentry Council (FIRC), which has been in existence since January 2011 and has been co-chaired by the Attorney General and the Director of the White House Domestic Policy Council since April 2016.⁶⁰ On July 30, 2015, in remarks highlighting critical issues in criminal justice reform, the Attorney General described the FIRC as a group “that works to align and advance reentry efforts across the federal government with an overarching aim to not only reduce recidivism and high correctional costs, but also to improve public health, child welfare, employment, education, housing, and other **key reintegration outcomes.**”⁶¹ The FIRC is further organized into subcommittees on topics such as children of incarcerated parents, tribal reentry matters, and access to healthcare.

Attorney General Eric Holder established the FIRC in January 2011. The FIRC is composed of volunteer representatives from 20 federal agencies whose chief focus is to remove federal barriers to successful reentry so that motivated individuals — who have served their time — are able to compete for a job, attain stable housing, support their children and their families, and contribute to their communities.

Although the RPP Program Statement does not explicitly require **the BOP’s** involvement with the FIRC, we believe that greater participation in the FIRC could support the **BOP’s** objective to enter into partnerships with other federal agencies.

In fact, one FIRC subcommittee in which the BOP participates has already assisted in an RPP-related matter involving the **BOP’s current efforts to establish a national MOU with the SSA to assist inmates with applying for benefits.**⁶² The FIRC Executive Director stated that this effort was built on the contacts, relationships, and work of SSA colleagues who were part of the FIRC benefits subcommittee. While the BOP regularly participates in the FIRC, it has only one representative who

⁶⁰ Other federal agencies who are members of the FIRC include the SSA and the U.S. Departments of Health and Human Services, Housing and Urban Development, Labor, and Education. For a complete list of the members and their roles in the FIRC, see Council of State Governments, “Federal Interagency Reentry Council,” <https://csgjusticecenter.org/nrrc/projects/firc> (accessed March 2, 2016). Also part of the FIRC, the BOP’s National Institute of Corrections provides guidance related to correctional policies, practices, and operations at the federal, state, and local levels.

⁶¹ Loretta Lynch, Attorney General, “Second Chances Vital to Criminal Justice Reform,” July 30, 2015, <https://www.justice.gov/opa/blog/second-chances-vital-criminal-justice-reform> (accessed February 2, 2016).

⁶² According to the MOU, inmates housed in institutions that have negotiated a written or verbal pre-release agreement with the local SSA office can receive assistance in applying for these benefits while they are still incarcerated. SSA, *What Prisoners Need to Know*, SSA Publication No. 05-10133 (June 2015), 7, <https://www.socialsecurity.gov/pubs/EN-05-10133.pdf> (accessed November 24, 2015).

attends **the FIRC's monthly meetings, in addition to other BOP staff members who** have attended subcommittee meetings at various times. Moreover, the FIRC Executive Director stated that not all FIRC subcommittees meet on a regular basis.

We believe that the BOP could further increase its involvement and participation in the FIRC to achieve similar results in issues such as education, community resources, access to Medicaid, housing, and veterans' needs. These issues **appear relevant to the BOP's release** preparation efforts and could be attributed to at least four of **the RPP's six core categories**. The FIRC could help the BOP establish partnerships with other federal agencies and could be an important forum for identifying release preparation efforts that would assist inmates in reintegrating into society.

Another reentry forum is the Reentry Roundtable, which is chaired by the Office of the Deputy Attorney General and composed of participants from several Department components as well as from the Administrative Office of the U.S. Courts, the Criminal Law Committee, the U.S. Sentencing Commission, the Federal Judiciary Center, Federal Defenders, U.S. Probation and Pretrial Services, and others. According to the Office of the Deputy Attorney General, the Reentry Roundtable provides an opportunity for key federal players to coordinate and cooperate to improve federal reentry outcomes. The Office of the Deputy Attorney General and BOP Headquarters personnel told the OIG that during the past few months, the BOP had used the Reentry Roundtable to gather feedback from and to collaborate with other components and agencies on two new initiatives the BOP was piloting to assist inmates in reentry. Specifically, the BOP developed a Reentry Handbook and a Reentry Services Hotline.⁶³ Like the FIRC, the Reentry Roundtable may also be a helpful forum to develop national-level interagency MOUs and to serve as a stakeholder in release preparation initiatives.

Given the important role that partnerships can have in building a comprehensive RPP, we believe that the BOP should make full use of existing forums such as the FIRC and the Reentry Roundtable.

The BOP Does Not Measure the Effect of Its Release Preparation Program on Recidivism

Reducing recidivism is one of the RPP's three objectives and, according to the BOP, the overarching purpose of its programming efforts.⁶⁴ Even so, we found that

⁶³ Because the BOP launched these initiatives so recently, there was insufficient data and information available for us to assess them. The new Reentry Handbook is available online in English at https://www.bop.gov/resources/pdfs/reentry_handbook.pdf and in Spanish at https://www.bop.gov/resources/pdfs/manual_reinsercion.pdf (both accessed August 25, 2016). The BOP reported that its new Reentry Services Hotline, which is staffed by inmates, is currently in the pilot stage and has received approximately 319 calls since April 2016.

⁶⁴ BOP Program Statement P5325.07 **states that the RPP's three objectives are to reduce the recidivism rate through inmate participation in the RPP; to enhance inmates' successful reintegration**
(Cont'd.)

the BOP has no performance metrics for the RPP and does not measure whether completing the RPP affects the likelihood that an inmate will recidivate. Additionally, as we discuss below, the BOP has not yet completed a recidivism analysis as required by the *Second Chance Act of 2007*.⁶⁵

We identified two factors that prevent the BOP from determining whether the RPP is reducing recidivism. First, the BOP does not have the information it needs to assess performance because it does not currently collect comprehensive recidivism data on its former inmates. Second, the wide variation in RPP curricula across BOP institutions greatly complicates any effort to isolate the effects of the RPP. Without the ability to ascertain whether RPP programming is effective in reducing recidivism, the BOP is hindered in its ability to make informed decisions to improve the RPP and maximize its effect on recidivism.

One significant factor that prevents the BOP from assessing the RPP's effect on recidivism is that it does not collect data sufficient to assess how many former BOP inmates are re-arrested after release, including federal, state, and local arrests. A 2015 Government Accountability Office report stated that the BOP was currently collecting criminal history data and planning to report in 2016 regarding the percentage of inmates who were arrested by any law enforcement agency in the United States or returned to BOP custody within 3 years of release.⁶⁶

This limitation on BOP data has an important impact on the BOP's effort to implement one aspect of the *Second Chance Act*. The *Second Chance Act* requires, among other things, that the BOP report statistics demonstrating the relative reduction in recidivism for released inmates for each fiscal year, as compared to the two prior fiscal years, beginning with FY 2009. The BOP's report must also compare inmates who participated in major inmate programs with inmates who did not participate in such programs. The *Second Chance Act* directs the BOP, in consultation with the Bureau of Justice Statistics, to select an appropriate recidivism measure that is consistent with the Bureau of Justice Statistics' research. Submission of the first report triggers a related statutory requirement that the BOP establish 5- and 10-year goals for reducing recidivism rates and then work to attain those goals.

BOP Headquarters officials told us that the BOP is working to implement this part of the statute but has experienced delays in publishing its first report. The officials stated that the first report will contain recidivism data for inmates released in FYs 2009, 2010, and 2011. According to these officials, the BOP will track re-arrests of its inmates over a 3-year period (including the year in which they were

into the community; and to establish partnerships with other federal agencies, private industry, and community service providers to provide information, programs, and services to releasing inmates.

⁶⁵ 42 U.S.C. § 17541(d)(3).

⁶⁶ Government Accountability Office, *Federal Prison System: Justice Could Better Measure Progress Addressing Incarceration Challenges*, GAO-15-454 (June 2015).

released), and collecting and analyzing this data will take the BOP an additional year. **Under the BOP's methodology, the BOP** could not have been able to complete the first report earlier than 5 years from the end of FY 2011, or September 30, 2016.⁶⁷ BOP officials stated that the first report has been delayed due to complications arising from the use of an expanded definition of recidivism, which in this report will include both BOP inmates who return to BOP custody and BOP inmates who are re-arrested at the state and local levels. According to these **officials, these complications have included "connectivity issues" that have impeded** the transfer of data from state and local law enforcement databases to the BOP. The officials did not provide a date for when this expanded data collection will begin, but they told us that the BOP expects to publish its first report in late 2016.

Another factor **affecting the BOP's ability to evaluate the RPP's effectiveness** in reducing recidivism is the wide variation in RPP curricula across BOP institutions, which greatly complicates any effort to isolate the effects of the RPP. Officials from **the BOP's Information, Policy, and Public Affairs Division** told us that the BOP has never conducted an internal study linking an inmate's participation in the RPP to recidivism, and that the BOP does not plan to do so. BOP officials explained that they seek to connect the **totality of the BOP's programming efforts to recidivism**, rather than attempting to isolate a connection between RPP completion and recidivism. While we found no evidence that the BOP has made such overall efforts to study the effects of its programming on recidivism, we did find that it has studied the effects of certain programs on recidivism. It has not done so for the RPP, and we found that the BOP studies thus far have only limited applicability to the RPP.

Between 1994 and 2012, **the BOP's Office of Research and Evaluation** issued 10 studies of BOP programs, other than the RPP, and their effects on recidivism. Nine of the studies had no direct relevance to the RPP.⁶⁸ One study, which the Office of Research and Evaluation completed more than 20 years ago, assessed, in part, whether educational training programs had reduced recidivism.⁶⁹ Though this study seemed to have potential relevance to the RPP, we determined that its findings had limited applicability in part because educational training programs are not consistently included in RPP curricula throughout BOP institutions. Some institutions include their GED courses in the RPP curriculum such that completion of

⁶⁷ BOP Headquarters officials told us that complete data would not be fully recorded until September 2015 and that another year is needed to acquire the data in order to write the report.

⁶⁸ The Office of Research and Evaluation studied vocational training and apprenticeships, drug treatment, education, intensive confinement, faith-based programs, sex offender treatment, and young male offenders programs. Some of these topics were covered by more than one of the BOP studies.

⁶⁹ BOP Office of Research and Evaluation, *Recidivism among Federal Prisoners Released in 1987* (August 1994). To assess the general effects of correctional programming on recidivism, this study used data on inmates whom the BOP released during the first 6 months of 1987.

particular GED courses satisfies one of the six core RPP requirements; at other institutions, GED courses do not count toward RPP completion.⁷⁰

As previously discussed, we found that the number and range of courses **offered in each of the RPP's six core categories varied greatly across the BOP's** 121 institutions and that because of this variation, the BOP cannot isolate the specific effects of RPP completion BOP-wide. Inconsistencies exist because BOP staff members at Headquarters and the institutions have different understandings of which programs can be included in the RPP. Their understandings differ even though the RPP Program Statement encourages institutions to use existing programs, such as vocational training, disease prevention classes, and parenting courses, to supplement RPP programming efforts. Without collecting and analyzing complete recidivism data, as mentioned above, and comparing it to data on RPP programming inmates had completed before their initial release, the BOP cannot determine whether the RPP is effective in reducing recidivism. Further, the absence of performance metrics of any kind prevents the BOP from knowing whether the RPP is resulting in inmates gaining skills and knowledge to prepare them for successful reentry to society.

⁷⁰ According to BOP Program Statement 5350.28, Literacy Program (GED Standard) (December 1, 2003), the GED program is designed to help inmates develop foundational knowledge and skill in reading, math, and written expression.

CONCLUSION AND RECOMMENDATIONS

Conclusion

To assist in the successful reintegration of inmates back into the community and to reduce recidivism, the BOP has established various programming efforts, which include a Release Preparation Program (RPP). In examining the RPP, we found that the program's overall effectiveness remains largely unknown. Because of inconsistencies in the content and quality of RPP courses, the BOP cannot ensure that all inmates receive the information they need to successfully transition back into the community. We identified the following particular areas of concern.

First, the BOP does not ensure that the RPP meets inmate needs across all institutions. Without a nationwide RPP curriculum, each BOP institution determines its own curriculum, leading to inconsistent content and quality in RPP courses that are offered. Moreover, the method that BOP institutions use to assess inmate needs and plan individual programming is not systematic and BOP institutions do not thoroughly assess their RPP or formally collect feedback from inmates to determine whether they find courses useful.

In addition, we found that the BOP releases many inmates who have not completed the RPP. There are in effect no repercussions for non-participation and no real incentives to participate. As a result, the RPP may not adequately address inmate release preparation needs.

We also found that the BOP does not fully leverage its relationships with other federal agencies to enhance its RPP efforts. In fact, the BOP has only one RPP-related national memorandum of understanding with a federal entity, the Social Security Administration, which is limited to assisting inmates in obtaining Social Security cards. Individual BOP institutions have resorted to contacting federal agencies at the local level for additional assistance with other benefits, which may lead to inconsistent results nationwide.

Last, the BOP has no performance measures to determine the RPP's effectiveness in meeting expected program outcomes, in particular the effect of RPP courses on inmate recidivism. The BOP has done one study that connects the effects of some programs to recidivism; however, it does not attempt to correlate RPP completion to recidivism. Further, the BOP will not be able to conduct any RPP-related recidivism studies until late 2016, when it has collected sufficient recidivism data.

Recommendations

To improve the effectiveness of the RPP in fulfilling its intent to reduce recidivism, we recommend that the BOP:

1. Establish a standardized list of courses, covering at least the Release Preparation Program's core categories, as designated by the BOP, to enhance

the consistency of Release Preparation Program curricula across BOP institutions.

2. Consider implementing the use of validated assessment tools to assess specific inmate programming needs.
3. Use evaluation forms to collect feedback from inmates about the Release Preparation Program courses they attend to facilitate improvement.
4. Develop and implement quality control for Release Preparation Program courses across all institutions.
5. Explore the use of incentives and other methods to increase inmate participation and completion rates for the Institution Release Preparation Programs.
6. Engage with other federal agencies to assess the feasibility and efficacy of establishing national memoranda of understanding to ensure inmates have timely and continuous access to federal services.
7. Establish a mechanism to assess the extent that, through the Release Preparation Program, inmates gain relevant skills and knowledge to prepare them for successful reentry to society.

SCOPE AND METHODOLOGY OF THE OIG REVIEW

For this review, the OIG analyzed BOP policies and programs for FY 2013 and FY 2014.⁷¹ Our fieldwork, conducted from March 2015 through August 2015, included data collection and analyses, interviews, site visits, and document reviews. We interviewed BOP Headquarters officials and visited six BOP institutions. At each site visit, we interviewed institution staff and inmates, observed Release Preparation Program (RPP) courses, and reviewed documents. Our site visits encompassed BOP institutions at all security levels, including minimum, low, medium, and high, as well as administrative security institutions such as federal medical centers and detention centers.

This review focused **exclusively on one component of the BOP's larger reentry efforts, the Release Preparation Program.** Each BOP institution offers a different set of programs, and it was beyond the scope of this review to assess the quality or **availability of programs not part of institutions' RPPs.**

Data Collection and Analyses

The OIG obtained and examined FY 2015 RPP course schedules at BOP institutions and the related lesson plans for those RPP courses. We reviewed a total of 121 RPP schedules. Our analyses identified trends and patterns for course offerings based on the six core categories and the security levels of the institutions. Appendix 2 has a more detailed discussion on the results of the analyses.

Interviews*Staff Interviews*

The OIG interviewed a total of 95 staff members during this review. At BOP Headquarters, we interviewed the Director of the National Institute of Corrections; the Chief of the Policy Development and Planning Section of the Correctional Programs Division; the Specialty Treatment Program Coordinator of the Psychology Services Branch; the Education Administrator and the Senior Deputy Assistant Director of the Industries, Education, and Vocational Training Division; the Chief Social Worker and National Health Service Administrator of the Health Services Division; the Correctional Program Reviewer of the Programs Review Division; the Chief Chaplain of Chaplaincy Services; the Administrator and Deputy Administrator of the National Reentry Affairs Branch of the Reentry Services Division; the Assistant Director of the Reentry Services Division; the Assistant Director and Senior Deputy Assistant Director of the Information, Policy, and Public Affairs Division; the Director and Research Analyst of the Office of Research and

⁷¹ We excluded from our analysis inmates housed in private correctional institutions, contract Community Corrections Centers, and contract state and local institutions. We also excluded inmates who were in pretrial detention since those inmates are not required to complete the RPP.

Evaluation; and the Senior Deputy Assistant Director and Administrator of the Correctional Programs Division. During our site visits to 7 BOP institutions, we interviewed 1 Warden, 8 Associate Wardens, 8 Reentry Affairs Coordinators, 6 RPP Committees consisting of a total of 26 members, 6 RPP Coordinators, 8 unit teams consisting of a total of 25 members, 1 Case Management Coordinator, 1 Unit Manager, and 1 Correctional Programs Administrator.

Inmate Interviews

We interviewed inmates at each of the BOP institutions we visited, for a total of 41 inmates. We randomly selected inmates for interviews based on a release date of August 1, 2015, or later.

Other Department Staff Interviews

We interviewed the former Co-Chair of the Federal Interagency Reentry Council to obtain information about the BOP's participation in the Council. We also interviewed officials of the Office of the Deputy Attorney General to discuss the role of the Reentry Roundtable and other Department reentry efforts related to the RPP. Finally, we spoke to the Deputy Director, Law Enforcement, Prosecution, Courts, and Special Projects at the Bureau of Justice Statistics to obtain information about prisoner recidivism.

State Correctional and Other Federal Agency Interviews

We also interviewed executive staff from the state correctional jurisdictions of California, Florida, Georgia, New York, and Texas to gain perspective on release programs offered to inmates under their custody. We interviewed Social Security Administration officials to discuss services related to BOP reentry efforts.

Site Visits

The OIG team visited six institutions: (1) Federal Medical Center Carswell, Texas; (2) Federal Correctional Institution (FCI) Seagoville, Texas; (3) FCI Fort Worth, Texas; (4) Federal Correctional Complex Victorville (which comprises an FCI Medium I and II and a U.S. Penitentiary), California; (5) FCI Terminal Island, San Pedro, California; and (6) Metropolitan Detention Center Los Angeles, California.⁷²

We also visited FCI Cumberland, Maryland to observe the institution's events on the launch of the inaugural National Reentry Week.

⁷² The OIG did not review the RPP schedule for Administrative U.S. Penitentiary Thomson because the facility began operations outside the scope of the review. The facility began accepting inmates on June 15, 2015. On March 24, 2016, there were 115 inmates at this facility. We did not review RPP schedules for contract facilities because the RPP is not required to be provided at these types of facilities. Finally, some BOP institutions provided RPP schedules for some Special Housing Units and satellite camp facilities. We reviewed these schedules but did not draw any overall conclusions because of the limited nature of the information.

Policy and Document Review

The OIG reviewed policies, procedures, and guidance related to the implementation of the RPP, at the national and institution levels. These reviews gave the OIG an understanding of the program requirements and its expected outcomes and provided information for the interviews that we conducted and the RPP schedules we examined.

We also reviewed documents related to inmate RPP participation, including inmate education transcripts and inmate skills development plans. In addition, we obtained and reviewed examples of class materials for certain RPP courses offered at the BOP institutions we visited.

RPP Course Observations

The OIG observed 16 RPP courses at the 6 BOP institutions we visited. These courses covered topics on release gratuities, habits, personal finance, personal growth and development, release procedures, parenting, child support, and a career clinic.

THE BOP'S RELEASE PREPARATION PROGRAM COURSE OFFERINGS

The BOP's Release Preparation Program (RPP) is composed of classes, instruction, and assistance in six broad categories. The six categories are Health and Nutrition, Employment, Personal Finance and Consumer Skills, Information and Community Resources, Release Requirements and Procedures, and Personal Growth and Development.

Each BOP facility develops its own RPP schedule based on the needs of its inmate population and resource availability. There is no nationwide core curriculum of RPP courses that is required for all inmates to attend when participating in the RPP. Inmates need only complete at least one course in each of the six categories to be considered as having successfully completed the RPP. The OIG obtained and examined FY 2015 RPP course schedules from 121 BOP institutions, and we discuss the results of our analyses below.⁷³

BOP Facilities with RPP Course Offerings

We examined the RPP schedules from 121 BOP institutions, covering 5 types of facilities:⁷⁴

1. Seventeen high security facilities, generally known as U.S. Penitentiaries;
2. Forty-seven medium security facilities, including some Federal Correctional Institutions (FCIs) and some U.S. Penitentiaries;
3. Thirty-one low security facilities (some FCIs);
4. Seven minimum security facilities (Federal Prison Camps);
5. Nineteen administrative facilities, including the Medical Center for Federal Prisoners, Metropolitan Correctional Centers, Metropolitan Detention Centers, Federal Detention Centers, Federal Medical Centers, and Federal Transfer Centers.

RPP Course Offerings

We examined each of the six core categories to identify the types of courses that may be available at a BOP facility, the courses most often offered at the BOP

⁷³ The OIG did not review the RPP schedule for Administrative U.S. Penitentiary Thomson because the facility was not operational at the time of the review. The facility began accepting inmates on June 15, 2015. On March 24, 2016, there were 115 inmates at this facility.

⁷⁴ We did not look at BOP contract facilities because the RPP is not required for these types of facilities.

facilities examined, and the courses most often offered based on the security level of the BOP facility. We discuss each core category below.

Health and Nutrition

In this core category, the RPP Program Statement suggested possible topics and courses to include disease prevention, weight management, holistic health, mental health support/counseling groups, eating and shopping nutritionally, stress management, sexuality, AIDS awareness, and physical fitness. We identified 81 different topics or courses offered through the 121 RPP schedules examined.⁷⁵ We further determined the three most popular courses offered for all BOP facilities and then by the security level. Table 3 depicts the results of the OIG review of the Health and Nutrition category.

**Table 3
Most Offered Health and Nutrition Courses at All BOP Institutions
and by Security Level**

BOP Facility (# of facilities)	First Most Offered Course(s) (# of facilities)	Second Most Offered Course(s) (# of facilities)	Third Most Offered Course(s) (# of facilities)
All BOP facilities (121)	Infectious Diseases (60)	Nutrition (50)	Weight Management/Diet (33)
Most Offered Courses by Institution Security Level			
High security (17)	Nutrition (6)	Infectious Diseases (5)	Fitness (4)
Medium security (47)	Infectious Diseases (30)	Nutrition (18)	Tied: Weight Management/Diet (13) Stress Management (13)
Low security (31)	Nutrition (15)	Infectious Diseases (11)	Tied: Weight Management/Diet (10) Exercise (10)

⁷⁵ Thirty-eight of the 81 identified Health and Nutrition topics/courses (47 percent) are offered at only 1 BOP institution.

Table 3 (Cont'd)

BOP Facility (# of facilities)	First Most Offered Course(s) (# of facilities)	Second Most Offered Course(s) (# of facilities)	Third Most Offered Course(s) (# of facilities)
Most Offered Courses by Institution Security Level			
Minimum security (7)	Tied: Infectious Diseases (4) Nutrition (4)	Weight Management/ Diet (3)	Not applicable
Administrative facility (19)	Infectious Diseases (10)	Nutrition (7)	Tied: Wellness (5) Weight Management/ Diet (5)

Source: OIG analysis of BOP data

In determining the most offered Health and Nutrition courses, the OIG found that these courses were not offered at every facility. For example, although Infectious Diseases is the most offered Health and Nutrition course for the 121 RPP schedules examined, it is listed in only 60 (50 percent) of the institution schedules provided to the OIG. Because BOP policy does not require specific topics to be covered in each core category, it is left to the individual institutions to determine the RPP schedule and course offerings for their respective location.

Employment

In this core category, the RPP Program Statement suggested possible courses and topics to include resume submission, writing skills, mock job fairs, aptitude testing, dressing for success, job search techniques, interviewing techniques or skills, career choices, keeping a job, and co-worker relationships. For this core category, we identified 68 different topics or courses offered through the 121 RPP schedules examined.⁷⁶ We further determined the three most popular courses offered for all BOP facilities and then by the security level. Table 4 below depicts the results of the OIG review of the Employment category.

⁷⁶ Thirty-four of the 68 identified Employment topics/courses (50 percent) are offered at only 1 BOP institution.

Table 4
Most Offered Employment Courses at All BOP Institutions
and by Security Level

BOP Facility (# of facilities)	First Most Offered Course(s) (# of facilities)	Second Most Offered Course(s) (# of facilities)	Third Most Offered Course(s) (# of facilities)
All BOP facilities (121)	Resume Writing (70)	Mock Job Fairs (67)	Interview Skills (57)
Most Offered Courses by Institution Security Level			
High security (17)	Resume Writing (11)	Interview Skills (9)	Job Search Techniques (7)
Medium security (47)	Mock Job Fairs (29)	Resume Writing (27)	Interview Skills (19)
Low security (31)	Tied: Resume Writing (18) Mock Job Fairs (18)	Interview Skills (15)	Not applicable
Minimum security (7)	Resume Writing (4)	Tied: Interview Skills (3) Mock Job Fair (3) Job Search Techniques (3) Dress for Success (3)	Not applicable
Administrative facility (19)	Tied: Mock Job Fairs (11) Interview Skills (11)	Resume Writing (10)	Not applicable

Source: OIG analysis of BOP data

The OIG notes that the most offered Employment courses are not necessarily offered at every BOP facility because BOP policy does not have required Employment courses and instead allows each BOP institution to determine which Employment courses to offer. For example, Resume Writing is identified as the most offered Employment course in the 121 RPP schedules examined. Yet it is listed in only 70 of the 121 (58 percent) schedules examined.

Personal Finance and Consumer Skills

In this core category, possible topics and courses include balancing and maintaining a checkbook, developing savings accounts, buying or leasing a car or a home, managing money or credit, and living on a budget. We identified 44 different topics or courses offered through the 121 RPP schedules examined.⁷⁷

We further determined the three most popular courses offered for all BOP facilities and for each security level. Table 5 below depicts the results of the OIG review of the Personal Finance and Consumer Skills core category.

⁷⁷ Fifteen of the 44 identified Personal Finance and Consumer Skills topics/courses (34 percent) are offered at only 1 BOP institution.

Table 5
Most Offered Personal Finance and Consumer Skills Courses at All BOP Institutions and by Security Level

BOP Facility (# of facilities)	First Most Offered Course(s) (# of facilities)	Second Most Offered Course(s) (# of facilities)	Third Most Offered Course(s) (# of facilities)
All BOP facilities (121)	Personal Finance (46)	Budgeting/Gratuities (35)	Money Smart (33)
Most Offered Courses by Institution Security Level			
High security (17)	Personal Finance (7)	Finance (5)	Budgeting/Gratuities (4)
Medium security (47)	Personal Finance (18)	Tied: Budgeting/Gratuities (13) Money Smart (13)	Not applicable
Low security (31)	Personal Finance (12)	Budgeting/Gratuities (11)	Finance (10)
Minimum security (7)	Personal Finance (4)	Tied: Managing Money and Credit (3) Money Smart (3) Credit and Consumer Issues (3)	Not applicable
Administrative facility (19)	Budgeting/Gratuities (6)	Tied: Checking (5) Managing Money and Credit (5) Personal Finance (5) Money Smart (5) Credit and Consumer Issues (5) Financial Planning (5)	Not applicable

Source: OIG analysis of BOP data

For the Personal Finance and Consumer Skills category, the most offered course was Personal Finance, which was listed in 46 of the 121 (38 percent) RPP schedules examined. As previously discussed, this course is not offered at all BOP facilities because the BOP allows each individual BOP facility to develop its own RPP curriculum. As a result, not all inmates may have the opportunity to take a Personal Finance and Consumer Skills course at their respective BOP facility.

Information and Community Resources

In this core category, the RPP Program Statement suggested possible topics and courses to include the role of the U.S. Probation Office (USPO) and supervision requirements, Residential Reentry Center (RRC) regulations, finding and using local social service agencies, Social Security resources, housing availability, state employment services, and legal requirements. Legal requirements may include, but

are not limited to, USPO reporting procedures, sex offender registration, and selective service registration. The OIG identified 43 different topics or courses offered through the 121 RPP schedules examined.⁷⁸ We further determined the three most popular courses offered for all BOP facilities and then by the security level. Table 6 depicts the results of the OIG review of the Information and Community Resources category.

Table 6
Most Offered Information and Community Resources Courses at All BOP Institutions and by Security Level

BOP Facility (# of facilities)	First Most Offered Course(s) (# of facilities)	Second Most Offered Course(s) (# of facilities)	Third Most Offered Course(s) (# of facilities)
All BOP facilities (121)	USPO Role/Supervision (88)	Residential Reentry Center (51)	Social Security (34)
Most Offered Courses by Institution Security Level			
High security (17)	USPO Role/Supervision (12)	Residential Reentry Center (7)	Tied: Social Security (4) Veterans (4)
Medium security (47)	USPO Role/Supervision (40)	Residential Reentry Center (16)	Veterans (13)
Low security (31)	USPO Role/Supervision (21)	Residential Reentry Center (15)	Community Resources (9)
Minimum security (7)	USPO Role/Supervision (4)	Tied: Veterans Reentry (3) Social Security (3) Release Prep (3)	Not applicable
Administrative facility (19)	Tied: USPO Role/Supervision (11) Residential Reentry Center (11)	Tied: Community Resources (7) Social Security (7)	Not applicable

Source: OIG analysis of BOP data

For the Information and Community Resources category, the most offered course at all BOP facilities was USPO Role/Supervision. We note that unlike the previous categories we discussed, this category generally has more instances in which the same or similar courses are consistently offered across all facilities. For example, the USPO Role/Supervision topic is listed in 88 of the 121 (73 percent) RPP schedules examined and is listed as the most offered course at all security levels. The rate is even higher for medium security facilities, where the course is

⁷⁸ Seventeen of the 43 Information and Community Resources topics/courses (40 percent) are offered at only 1 BOP institution.

listed in 40 out of 47 RPP schedules (85 percent) of the RPP schedules for medium security facilities.

Release Requirements and Procedures

In this core category, the RPP Program Statement listed possible topics and courses to include types of releases, releases to detainers, release gratuities, conditions of supervision, disposition of personal property, release clothing, trust fund account, inmate telephone system accounts, advanced pay requests, Inmate Financial Responsibility Program, post-release obligation, and reporting procedures. BOP policy further stated that this core category is not intended to replace the Unit RPP. The OIG identified 26 different topics or courses offered through the 121 RPP schedules examined.⁷⁹ Of the six core categories, the Release Requirements and Procedures category had the fewest topics and courses listed in the RPP schedules reviewed.

We further determined the three most popular courses offered for all BOP facilities and then by the security level. Table 7 depicts the results of the OIG review of the Release Requirements and Procedures category.

**Table 7
Most Offered Release Requirements and Procedures Courses at All BOP Institutions and by Security Level**

BOP Facility (# of facilities)	First Most Offered Course(s) (# of facilities)	Second Most Offered Course(s) (# of facilities)	Third Most Offered Course(s) (# of facilities)
All BOP facilities (121)	Release Methods, Procedures, and Requirements (103)	Release and Gratuity (13)	Reporting Procedures (9)
Most Offered Courses by Institution Security Level			
High security (17)	Release Methods, Procedures, and Requirements (13)	Release and Gratuity (3)	Not applicable
Medium security (47)	Release Methods, Procedures, and Requirements (40)	Release and Gratuity (5)	Reporting Procedures (4)

⁷⁹ Seven of the 26 Release Requirements and Procedures topics/courses (27 percent) are offered at only 1 BOP institution.

Table 7 (Cont'd)

BOP Facility (# of facilities)	First Most Offered Course(s) (# of facilities)	Second Most Offered Course(s) (# of facilities)	Third Most Offered Course(s) (# of facilities)
Most Offered Courses by Institution Security Level			
Low security (31)	Release Methods, Procedures, and Requirements (27)	Disposition of Property/Mail (4)	Tied: Reporting Procedures (3) Release and Gratuity (3) RRC Rules and Regulations (3)
Minimum security (7)	Release Methods, Procedures, and Requirements (6)	Not applicable	Not applicable
Administrative facility (19)	Release Methods, Procedures, and Requirements (17)	Release and Gratuity (2)	Not applicable

Source: OIG analysis of BOP data

For the Release Requirements and Procedures category, the most offered course at all BOP facilities was Release Methods, Procedures, and Requirements. This category generally has more instances in which the same or similar courses are consistently offered across all facilities. For example, the Release Methods, Procedures, and Requirements course is listed in 103 of the 121 (85 percent) RPP schedules examined and is listed as the most offered course at all security levels. The rate is even higher for low security level facilities and administrative facilities, where the course is listed in 27 out of 31 (87 percent) and 17 out of 19 (89 percent) RPP schedules, respectively.

Personal Growth and Development

For this core category, the RPP Program Statement listed possible topics and courses to include marriage enrichment, parenting, child development, discipline of children, activities for and with children, interacting with school and child care, the effect of separation on children, positive self-image, anger control, cognitive skills, substance abuse treatment programs, drug education, speech or communication classes, education, victim awareness, life skills information, relapse prevention, and developmental psychology. The OIG identified 155 different topics or courses offered through the 121 RPP schedules examined.⁸⁰ Of the six core categories, the Personal Growth and Development category has the most topics and courses listed in the RPP schedules reviewed.

⁸⁰ Sixty-five of the 155 Personal Growth and Development topics/courses (42 percent) are offered at only 1 BOP institution.

We further determined the three most popular courses offered for all BOP facilities and then by security level. Table 8 depicts the results of the OIG review of the Personal Growth and Development category.

Table 8
Most Offered Personal Growth and Development Courses at All BOP Institutions and by Security Level

BOP Facility (# of facilities)	First Most Offered Course(s) (# of facilities)	Second Most Offered Course(s) (# of facilities)	Third Most Offered Course(s) (# of facilities)
All BOP facilities (121)	Parenting (70)	Anger Management (54)	Victim Impact/Awareness (45)
Most Offered Courses by Institution Security Level			
High security (17)	Personal Growth (7)	Anger Management (6)	Tied: Victim Impact/Awareness (5) Parenting (5)
Medium security (47)	Parenting (28)	Anger Management (24)	Drug Education/Abuse Program (19)
Low security (31)	Parenting (20)	Tied: Anger Management (12) Victim Impact/Awareness (12)	Not applicable
Minimum security (7)	Parenting (6)	Tied: Anger Management (4) Victim Impact/Awareness (4)	Not applicable
Administrative facility (19)	Parenting (11)	Tied: Drug Education/Abuse Program (9) Victim Impact/Awareness (9)	Not applicable

Source: OIG analysis of BOP data

For the Personal Growth and Development category, the most offered course at all BOP facilities was Parenting. This course is listed in 70 of the 121 (58 percent) RPP schedules examined. The OIG noted that the low and minimum security facilities had a higher percentage of parenting courses offered at 20 of 31 institutions (64 percent) and 6 of 7 institutions (86 percent), respectively.

THE BOP'S RESPONSE TO THE DRAFT REPORT



U.S. Department of Justice

Federal Bureau of Prisons

Office of the Director

Washington, D.C. 20534

August 12, 2016

MEMORANDUM FOR NINA S. PELLETIER
ASSISTANT INSPECTOR GENERAL
OFFICE OF INSPECTOR GENERAL
EVALUATION AND INSPECTIONS DIVISION

Thomas R. Kane

FROM: Thomas R. Kane, Acting Director

SUBJECT: Response to the Office of Inspector General's (OIG)
FORMAL Draft Report: Review of the Federal Bureau
of Prison's Release Preparation Program, Assignment
Number A-2015-003

The Bureau of Prisons (BOP) appreciates the opportunity to respond to the open recommendations from the formal draft report entitled Review of the Federal Bureau of Prison's Release Preparation Program.

Please find the Bureau's response to the recommendations below:

To improve the effectiveness of the RPP in fulfilling its intent to reduce recidivism, we recommend that the BOP:

Recommendation 1: "Establish a standardized list of courses, covering at least the Release Preparation Program's core categories, as designated by the BOP, to enhance the consistency of Release Preparation Program curriculum across BOP institutions."

Response: The BOP agrees with the recommendation. The BOP will develop a standardized list of RPP courses to be offered at all

institutions, which will cover at least the core categories, for the purpose of enhancing consistency of the RPP curriculum nationwide.

Recommendation 2: "Consider implementing the use of validated assessment tools to assess specific inmate programming needs."

Response: The BOP agrees with the recommendation. The BOP will explore and consider implementing a validated risk assessment tool for specific programming needs.

Recommendation 3: "Use evaluation forms to collect feedback from inmates about the Release Preparation Program courses they attend to facilitate improvement."

Response: The BOP agrees with the recommendation. The BOP will develop a program evaluation process to collect feedback from inmate participants.

Recommendation 4: "Develop and implement quality control for Release Preparation Program courses across all institutions."

Response: The BOP agrees with the recommendation. The BOP will develop and standardize quality control measures for RPP courses.

Recommendation 5: "Explore the use of incentives and other methods to increase inmate participation and completion rates for the Institution Release Preparation Programs."

Response: The BOP agrees with the recommendation. The BOP will explore the use of incentives and other methods to increase inmate participation and completion rates for the institution RPPs.

Recommendation 6: "Engage with other federal agencies to assess the feasibility and efficacy of establishing national memoranda of understanding to ensure inmates have timely and continuous access to federal services."

Response: The BOP agrees with the recommendation. The BOP will consult with members of the Federal Interagency Reentry Council and Reentry Roundtable regarding national memoranda of understanding opportunities.

Recommendation 7: "Establish a mechanism to assess the extent that, through the Release Preparation Program, inmates gain relevant

skills and knowledge to prepare them for successful reentry to society."

Response: The BOP agrees with the recommendation. The BOP will establish a mechanism to assess the extent to which the RPP provides inmates with relevant skills and knowledge to prepare them for successful reentry to society through the RPP.

If you have any questions regarding this response, please contact Steve Mora, Assistant Director, Program Review Division, at (202) 353-2302.

OIG ANALYSIS OF THE BOP'S RESPONSE

The OIG provided a draft of this report to the BOP. The BOP's response is included in Appendix 3 above. Below, we discuss the OIG's analysis of the BOP's response and actions necessary to close the recommendations.

Recommendation 1: Establish a standardized list of courses, covering at least the Release Preparation Program's core categories, as designated by the BOP, to enhance the consistency of Release Preparation Program curricula across BOP institutions.

Status: Resolved.

BOP Response: The BOP concurred with the recommendation and stated that it will develop a standardized list of Release Preparation Program (RPP) courses to be offered at all institutions, which will cover at least the core categories for the purpose of enhancing the consistency of the RPP curriculum nationwide.

OIG Analysis: The BOP's planned actions are responsive to our recommendation. By November 30, 2016, please provide a copy of the standardized list of RPP courses and the related lesson plans for these courses. If the standardized list of RPP courses is still under development, please provide a status report and milestone dates for the planned completion and implementation of this standardized list of RPP courses.

Recommendation 2: Consider implementing the use of validated assessment tools to assess specific inmate programming needs.

Status: Resolved.

BOP Response: The BOP concurred with the recommendation and stated that it will explore and consider implementing a validated risk assessment tool for specific programming needs.

OIG Analysis: The BOP's planned actions are responsive to our recommendation. By November 30, 2016, please provide documentation that the BOP explored and considered implementing a validated risk assessment tool for specific programming needs. If the BOP is still considering implementing a validated risk assessment tool, please provide a status report and milestone dates on this effort. If the BOP determines that it will not implement a validated risk assessment tool for specific programming needs, please provide an explanation for the decision.

Recommendation 3: Use evaluation forms to collect feedback from inmates about the Release Preparation Program courses they attend to facilitate improvement.

Status: Resolved.

BOP Response: The BOP concurred with this recommendation and stated that it will develop a program evaluation process to collect feedback from inmate participants.

OIG Analysis: The BOP's planned actions are responsive to our recommendation. By November 30, 2016, please provide a description of the program evaluation process developed to collect feedback from inmate participants, a description of how the process will be used to facilitate improvement of the program, and copies of some of the feedback received from inmates. If the program evaluation process to collect inmate participant feedback is still under development, please provide a status report and milestone dates on the planned completion and implementation of this process.

Recommendation 4: Develop and implement quality control for Release Preparation Program courses across all institutions.

Status: Resolved.

BOP Response: The BOP concurred with this recommendation and stated that it will develop and standardize quality control measures for RPP courses.

OIG Analysis: The BOP's planned actions are responsive to our recommendation. By November 30, 2016, please provide a description of the standardized quality control measures for RPP courses and how they will be used, and copies of any documents that will be used to implement these measures. If the standardized quality control measures for RPP courses are still under development, please provide a status report and milestone dates on the planned completion and implementation of these standardized quality control measures.

Recommendation 5: Explore the use of incentives and other methods to increase inmate participation and completion rates for the Institution Release Preparation Programs.

Status: Resolved.

BOP Response: The BOP concurred with this recommendation and stated that it will explore the use of incentives and other methods to increase inmate participation and completion rates for the institution RPPs.

OIG Analysis: The BOP's planned actions are responsive to our recommendation. By November 30, 2016, please provide descriptions of the incentives and other methods that the BOP has implemented to increase inmate participation and completion rates for the Institution RPPs. Please also provide information to show that inmate participation and completion rates for Institution RPPs have increased as a result of the use of the incentives or other methods. If the incentives and other methods have not been identified or implemented, please provide a status report and milestone dates on the planned completion and implementation of the incentives and other methods.

Recommendation 6: Engage with other federal agencies to assess the feasibility and efficacy of establishing national memoranda of understanding to ensure inmates have timely and continuous access to federal services.

Status: Resolved.

BOP Response: The BOP concurred with this recommendation and stated that it will consult with members of the Federal Interagency Reentry Council and Reentry Roundtable regarding national memoranda of understanding opportunities.

OIG Analysis: The BOP's planned actions are responsive to our recommendation. By November 30, 2016, please provide a status report and milestone dates **on the BOP's efforts to identify** and develop any additional national memoranda of understanding with other federal agencies to ensure **federal inmates'** timely and continuous access to federal services. In addition, please indicate the types of federal services about which the BOP is consulting with other agencies to provide its inmates. Please include any copies of final or draft national memoranda of understanding. If the BOP determines that it will not establish national memoranda of understanding with other federal agencies to ensure inmates have timely and continuous access to federal services, please provide documentation of consultations with members of the Federal Interagency Reentry Council and the Reentry Roundtable.

Recommendation 7: Establish a mechanism to assess the extent that, through the Release Preparation Program, inmates gain relevant skills and knowledge to prepare them for successful reentry to society.

Status: Resolved.

BOP Response: The BOP concurred with this recommendation and stated that it will establish a mechanism to assess the extent to which the RPP provides inmates with relevant skills and knowledge to prepare them for successful reentry to society through the RPP.

OIG Analysis: The BOP's planned actions are responsive to our recommendation. By November 30, 2016, please provide a description of the mechanism the BOP implemented to assess the extent to which the RPP will provide inmates with relevant skills and knowledge to prepare them for successful reentry to society. If the mechanism is still under development, please provide a status report and milestone dates on the planned completion and implementation of the BOP mechanism to assess the extent to which the RPP provides inmates with relevant skills and knowledge to prepare them for success reentry to society.

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