

# EXHIBIT N

Federal Bureau of Prisons  
Federal Correctional Institution—Dublin  
*Draft Assessment Report: Building a Culture of Safety*  
*Summer 2022*

*In partnership with the  
Federal Bureau of Prisons*



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# Table of Contents

<b>FCI-Dublin Cultural Assessment .....</b>	<b>3</b>
<b>Introduction .....</b>	<b>3</b>
<b>Methodology .....</b>	<b>3</b>
<b>Agency and Facility Overview .....</b>	<b>5</b>
<b>Bureau of Prisons .....</b>	<b>5</b>
<b>Women and Special Populations Branch .....</b>	<b>5</b>
<b>Western Regional Office .....</b>	<b>5</b>
<b>FCI-Dublin .....</b>	<b>5</b>
<b>Influencing Factors .....</b>	<b>6</b>
<b>Summary of Strengths .....</b>	<b>7</b>
<b>Themes and Recommendations .....</b>	<b>8</b>
<b>Leadership, Management, and Oversight.....</b>	<b>8</b>
<b>Leadership, Management, and Oversight Recommendations .....</b>	<b>9</b>
<b>Reporting and Cultural Indicators .....</b>	<b>11</b>
<b>Reporting and Cultural Indicators Recommendations .....</b>	<b>12</b>
<b>Staffing and Supervision.....</b>	<b>13</b>
<b>Staffing and Supervision Recommendations .....</b>	<b>14</b>
<b>Human Resources.....</b>	<b>15</b>
<b>Human Resources Recommendations .....</b>	<b>16</b>
<b>Staff Training.....</b>	<b>17</b>
<b>Staff Training Recommendations .....</b>	<b>18</b>
<b>Inmate Services.....</b>	<b>20</b>
<b>Inmate Services Recommendations .....</b>	<b>20</b>
<b>Facility Operations.....</b>	<b>21</b>
<b>Facility Operations Recommendations .....</b>	<b>22</b>
<b>Satellite Camp Prison—Dublin.....</b>	<b>22</b>
<b>Satellite Camp Prison—Dublin Recommendations .....</b>	<b>23</b>
<b>Attachment A: Summary of Recommendations .....</b>	<b>24</b>
<b>Attachment B: Gender-responsive Staffing.....</b>	<b>32</b>
<b>Attachment C: Training Matrix .....</b>	<b>34</b>

# FCI-Dublin Cultural Assessment

## Introduction

The Moss Group, Inc. (TMG), a Washington, DC-based criminal justice consulting firm, was contracted by the Federal Bureau of Prisons (BOP), Reentry Services Division, Women and Special Populations Branch (WASPB) to assess facility culture and its implications on safety, specifically sexual safety, at the Federal Correctional Institution located in Dublin, California (FCI-Dublin). FCI-Dublin is a low security women's correctional facility co-located with a minimum security camp facility. This baseline assessment is intended to address the norms and practices that impact sexual safety and the BOP's mission to effectively work with individuals housed in women's institutions. More specifically, to focus on the cultural norms that are not always recognizable through adherence to policy. For example, the Prison Rape Elimination Act (PREA) requires a process for reporting sexual abuse allegations but doesn't address the willingness to use and trust in those processes and systems. TMG's work isolates characteristics of a reporting or a non-reporting environment that goes beyond policy.

This report reflects themes related to agency and facility policy and practice that hinder or support a safe environment and a healthy culture. The assessment is designed to address agency and facility strengths and challenges observed through a preliminary document review, interviews with key headquarters and regional office personnel, and onsite interviews, focus groups, and discussion groups with staff and the population at FCI-Dublin, which occurred May 10 -12, 2022. Recommendations are offered to strengthen facility culture and practices. While FCI-Dublin is the focus of this assessment, this process generates implications and recommendations that are key to the oversight and support of the mission and operations throughout the BOP. See **Attachment A** for the *Summary of Recommendations*.

## Methodology

The TMG assessment model has been shaped by research and evidence-based literature, practitioner experience, knowledge of organizational culture dynamics, and collaborative partnerships with federal, state, and private entities. TMG's approach is built on nationally accepted best practice related to safety<sup>1</sup> as well as formal and informal cultural norms that support healthy cultures in facilities housing women. Further, the assessment protocol was customized to meet the presenting issues of FCI-Dublin—specifically assessing the strengths and challenges of managing a culture of safety with emphasis on sexual safety. The seven-step assessment process begins at the first engagement and culminates into technical assistance as the facility works on implementation. The graphic below represents each stage.

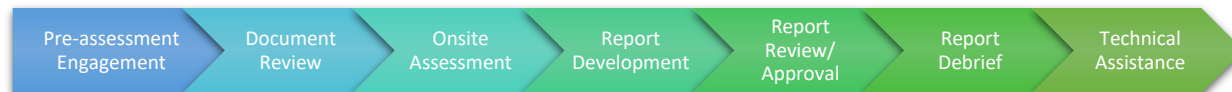


Figure 1: Assessment Seven-step Approach

**Step 1—Pre-Assessment Engagement.** The pre-assessment engagement phase includes initial contact with agency and facility leadership, discussion regarding influencing factors, presenting issues, and intended outcomes. In addition, prior to the onsite assessment, TMG collaborated with WASPB to deliver a week of targeted training to staff in March 2022 to provide immediate support and professional development. This intervention was a partial response to the intense scrutiny and circumstances surrounding the facility as a result of extensive and ongoing concerns for a safe environment for both staff and the population. Further discussion of the training is provided in the *Staff Training* section.

<sup>1</sup> Including research, selected American Correctional Association (ACA) Standards for Adult Correctional Facilities, selected PREA Standards for Prisons and Jails, National Commission on Correctional Healthcare, key DOJ Guidance in Restrictive Housing, and the National Resource Center for Justice Involved Women (NRCJW), and resources, such as the *NIC Gender-responsive Discipline and Sanctions Policy Guide for Women's Facilities* and *NIC's Using Trauma Informed Practices to Enhance Safety and Security in Women's Correctional Facilities*

**Step 2—Document Review.** The document review phase assists in understanding the language, terminology, and acronyms and identifies formal BOP policy guidance and areas to be explored further while onsite. Documentation reviewed included policies, the final task force report, media articles, and federal reports, such as the PREA Audit and OIG reports. Information gathered through these initial phases supports the customization of protocols to fit the needs of FCI-Dublin and agenda development.

**Step 3—Onsite Assessment.** The third phase of the process was the assessment, which included a structured onsite visit May 10–12, 2022. The assessment began with an introductory meeting at FCI-Dublin on May 10. The warden, associate wardens, and captain participated in this meeting and provided insights related to current events, hopes, influencing factors, and ongoing challenges. Following this meeting, the assessment team was provided with a facility tour and then completed the following activities:

- Structured observations of operations and programs
- Interviews with facility leadership, management, and key department staff members
- Focus groups with a random sample of custody and non-custody staff members
- Individual and group discussions with a random sample of incarcerated women

The assessment team evaluated policy, procedure, and practice in several areas as informed by the presenting issues at FCI-Dublin. While specific areas are reviewed for alignment with best practices, this is not an official program review or audit and should not be used to satisfy or as reference for any certifications or annually required audits. Rather, this is a targeted, baseline approach to assess cultures of safety with emphasis on sexual safety to inform practical action steps in the areas outlined below.



Figure 2: Assessment Domains

Following the onsite assessment, TMG conducted interviews with select members of the BOP director's task force and regional leadership to gain additional perspective. These interviews provided additional context and highlighted ongoing efforts to support the facility.

**Step 4—Report Development.** This report signifies the fourth phase of this process and is organized by emerging themes. Areas assessed have been consolidated under major presenting themes, including leadership and oversight, reporting and cultural indicators, staffing and supervision, staff training, inmate services, and facility operations. The term “operational practice” as used in this report refers to processes that are critical to the day-to-day safety and security of the facility that are grounded primarily in security functions. For example, medical care represents a service provided, while the transportation to medical appointments would be an operational practice.

# Agency and Facility Overview

## Bureau of Prisons

The BOP was established within the Department of Justice by Congress in 1930 to provide more progressive and humane care for federal inmates, to professionalize the prison service, and to ensure consistent and centralized administration of federal prisons. It is responsible for over 140,000 incarcerated individuals, nearly 35,000 employees, and 122 institutions, including minimum, low, medium, high, and administrative security levels. It is headquartered in Washington, DC, where its division leadership and management oversee all operations, including the Reentry Services Division (RSD) that directs the Women and Special Populations Branch.

## Women and Special Populations Branch

The WASPB serves as the agency's source for expertise on classification, management, and intervention programs and practices for females in BOP custody. The WASPB is led by a mental health clinician and staffed by programming and policy authorities. It is guided by the Program Statement, *Female Offender Manual, Number 5200.07 CN-1*<sup>2</sup> most recently revised May 12, 2021, with a guiding Program Statement that emphasizes purpose and scope, branches and divisions, staff training specific to women offenders, special populations, and overall management of those housed in women's institutions. It annually meets with correctional, psychology, chaplaincy, education, programs, reentry, healthcare, social, and legal services to discuss female population needs and to evaluate gender-responsive services.

## Western Regional Office

Six regional areas comprise the BOP. FCI-Dublin is in the western region along with 19 other facilities across 11 states, including Hawaii. Regional offices provide operational oversight, assist state and local criminal justice agencies, contract to provide inmate placement in residential reentry centers, and conduct technical assistance, such as workshops, conferences, and specialized training programs to facilities within the region. We understand the role is being reviewed and is anticipating a policy change.

Regional offices are tasked with ensuring staffing at female facilities is appropriate, including satellite camps, and providing oversight regarding program usage, new programs, and trends. The regional office is responsible for establishing a Regional Female Offender Coordinator Collateral Duty Assignment to meet quarterly with the WASPB to discuss staffing and programming needs, conduct an annual program review, and ensure women have access to programs similar to those offered at facilities housing sentenced women.

## FCI-Dublin

FCI-Dublin is one of 29 BOP facilities housing women overseen by the WASPB. It is located in Dublin, California. It is a low security women's federal correctional institution with an adjacent minimum security satellite camp. It's designed facility capacity is 784, with 590 at FCI and 194 at the satellite camp. FCI-Dublin was activated in 1974 as a co-correctional youth facility. In 1977, it converted to an adult female facility; in 1979, it operated as an adult co-correctional facility; in 1990, it reverted to an adult female facility with an adjacent detention center that housed adult males until 2014.

With an average daily population of approximately 753, the general housing units are organized in three buildings with two wings each: A/B, C/D, and E/F. Each unit contains 117 multiple occupancy rooms. In each wing, cells are organized on two floors in an L shape, facing a central area day room. Staff offices are located in the day room area and centrally between each wing of the building. At the time of the assessment, D unit housed inmates in the Residential Drug Abuse Program (RDAP). The Special Housing

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<sup>2</sup> Female Offender Manual: <https://www.bop.gov/policy/progstat/5200.07b.pdf>

Unit (SHU) contains 16 cells in two wings with a central officer desk. The Camp has two housing units—J1 and J2—with multiple occupancy cells on two floors and a central dayroom area.

## Influencing Factors

It is TMG's practice to consider major influencing factors that affect daily operations of a facility. With this information, TMG tailors the assessment approach to navigate those factors and expand methodology. Influencing factors at FCI-Dublin are outlined below. While not an exhaustive list, these areas were raised as important considerations for implementing any proposed recommendations.



Figure 3: Influencing Factors

**Criminal Investigations.** Several staff members, including the warden, chaplain, a prison safety administrator, a food service supervisor, and a recycling technician, have been indicted or charged with allegations of sexual misconduct against women housed at FCI-Dublin. During the course of this contract, there have been convictions. The investigations into these incidents have resulted in the removal or placement on administrative leave of several staff members. Some staff reported frustrations that efforts were previously made to report misconduct that staff had experienced, and it went unaddressed until it reached the leadership level. At the time of the assessment, some staff were anticipating the upcoming sentencing of these former staff members and hoping to see them held accountable. It is important to staff that there are consequences for staff breaking policy and the law.

**Lack of Continuity in Leadership.** It is customary in BOP facilities for leadership staff to rotate every 18 months to two years. However, over the last few years, FCI-Dublin has seen significant and frequent shifts in the leadership team. When leadership teams are perceived to be transitory, it can often create environments where more informal leaders and subcultures emerge, initiatives are left incomplete, and rules are inconsistently enforced. It is important for the current administrative team to ground in an opportunity to lead change.

**Location.** As reported by staff, the cost of living in the San Francisco Bay area is two to three times higher than the national average, with limited affordable housing options. Thus, staff commute 45 minutes to two hours each way to get to and from work. In response to this issue, staff salaries at FCI-Dublin are the highest in the BOP and the facility operates under a modified 6:00am – 2:00pm schedule, which is different than most other BOP institutions. See the *Facility Operations* section for additional information regarding the facility schedule.

**Media Attention and Scrutiny.** FCI-Dublin has received much attention from national and international news, with media crews often setup at the facility entrance. Staff report the ongoing media coverage has had an influence on staff morale. There is an overall sentiment that those outside of the facility lack understanding of how long it will take to repair the damage that these incidents have had on the institution. Some staff are embarrassed and reportedly being questioned by neighbors, friends, and family. It was also reported by the population that their families were concerned based on the media attention.

**Increased Attention on FCI-Dublin.** Following the reports of misconduct and in response to the Deputy Attorney General, several teams visited FCI-Dublin, including investigation teams, program review teams, and the assembly of a special task force in March 2022. The task force was made up of 19 BOP experienced managers with deep knowledge of BOP policy. Members conducted their review the week of March 7, 2022.



The influx of visitors and assessment, investigative, and review activities, though important, applied more stress to an already stressed environment. The tone of these reviews, regardless of intention, were perceived to be punitive, accusatory, and heavily focused on the population and perceived to be less focused on staff. For instance, a new communication system was put in place that gave the population immediate access to central office. An approach that engages the population before adequately informing and interfacing with the staff can create challenges for staff. The response to FCI-Dublin has left many staff members feeling unsupported and blamed for a culture that was cultivated by and unaddressed by local leadership and further up the ranks. Further, the various teams left the leadership team with an abundance of required and recommended next steps from multiple sources, which need to be digested and sequenced into a realistic and workable action plan.

**Staffing.** FCI-Dublin is challenged with staffing due to the higher cost of living in the area, national staffing challenges for law enforcement and correctional positions since the pandemic, and a lack of female staff working in corrections. To address this challenge, the facility has brought in temporary duty (TDY) positions from other federal institutions who may have no knowledge of women's needs, augmented non-custody staff routinely into custody posts, and have relied on female non-custody staff to supplement posts that require female staff presence, such as during transportation. See *Staffing and Supervision* for additional information and recommendations.

**Strong Union Presence.** The union leadership team is small and governed by two retired federal employees with one onsite representative. The structure of having retired individuals as union leaders appears to be particularly time consuming for facility leadership to manage, as communication is often lacking and divisive. The relationship between the facility, regional office, human resources, and the union is reportedly challenging and strained.

**COVID-19.** While BOP and FCI-Dublin have been creative and effective in implementing practices to comply with national safety protocols, the consequences of COVID-19 have been detrimental to the functioning of correctional facilities nationwide—altering the routine functioning of operational procedures, inmate movement protocols, exercise and recreation activities, programming, religious services, kitchen and dining hall uses, housing and bed assignments, medical and mental health services, and more. These challenges are compounded in a women's facility, as women rely heavily on relational pro-social activities for their support systems. Further, staff availability for training has been impacted due not only to time constraints but also to staffing shortages and participant limits related to the COVID-19 and class size. This limits the ability of the department to continue to build skills and the staff's ability to develop professionally.

## Summary of Strengths

**Headquarters, WASPB, and Regional Office Support.** The BOP has had some form of an organizational position and office to oversee the agency's approach to the female population for at least 25 years, with a guiding program statement that sets the standard to guide operations in women's institutions. The access to subject matter experts in both the regional and headquarters offices provide the structure for greater assistance in a thoughtful planning effort to assist in the coming months. The BOP has considerable expertise to support the strengthening of various facility programs and operations.



Figure 4: Summary of Strengths

Further, following the reports of sexual misconduct, BOP acted to understand the present operations and practices at FCI-Dublin and included an executive directive to immediately re-train staff on working with women and promoting sexual safety. TMG co-delivered this training with WASPB March 28–31, 2022. See *Staff Training* for additional information about this activity.



**Overall Facility.** Both the population and staff noted that, in spite of the painful events, they felt the facility is overall a safe place to live and work. The housing units have large windows facing the courtyard that provide light and a nice view, which the population appreciated compared to other facilities that are darker. Further, the facility had a recent successful PREA audit.

**Facility Leadership.** It is a notable strength that the BOP is focused on establishing a cohesive leadership team at FCI-Dublin and ensuring the new structure is supported. The assignment of an experienced warden to the facility in February 2022 initiated a reset of a facility executive team and provided for a leadership response by a well-versed leader in BOP policy. The goals of the warden include re-establishing operational order and adherence to policy. This understanding and openness to moving forward is essential in creating stability in operations and modeling a culture rooted in its expectations for safety. There is an immediate need for support from HR to assign new executive team members, which will further strengthen order and safety at the facility. The population also noted the approachability of the warden as a plus.

**Facility Staff.** Another strength is the eagerness of staff and the population to regenerate operational best practices, strengthen accountability systems, and embrace a culture of safety. This was further emphasized in the training provided to staff pre-assessment. Staff were respectful and engaged in discussions. The energy about the facility—from the population to facility leadership—signifies an alignment with the need and a commitment to change. Most staff take pride in their work and expressed a sense of duty to each other and the mission of BOP. Some staff also commented on the camaraderie and cohesiveness of the team, especially among homesteaders.

**Population Programming.** Though hampered significantly by COVID-19, program offerings appear to have been a strength of the facility in specific content areas. Because of the “red” status during the onsite visit, there were limited opportunities to observe activity and programming. Interviews with staff and the population indicated a strong desire to return to programming, particularly education.

## Themes and Recommendations

This section of the report will highlight the overall themes learned and observed through the assessment process. Practical recommendations are shaped by these themes that present as a challenge or inconsistency. TMG carefully cross referenced its work with existing task force recommendations to ensure integration and avoid duplicity. While the task force focused largely on policy, the work conducted by TMG is focused on cultural indicators, perceptions, and patterns—most notably those that support or diminish safety. Some recommendations are specific to the facility while others are directed toward the agency to address oversight and systemic challenges. It should be noted that a number of issues were identified as systemic, and as such, the recommendations may need to be considered for other facilities.

### Leadership, Management, and Oversight

**BOP Central Office, WASPB, and Regional Oversight.** The WASPB Program Statement states the mission, values, and expected process for implementing a BOP gender-responsive approach with full involvement of the regional office and various divisions in headquarters. While documents reviewed indicate a thoughtful approach to gender-responsive practices for working with the female population, there is limited understanding of operational practice in working with the female population at the facility and at regional and executive levels in areas such as programming and HR, resulting in confusing perceptions of what it means to have a gender-responsive approach. This is evident in key areas of support functions outside of the general operation of the facility.

Further, the *Program Statement, Female Offender Manual* establishes that the regional office will dedicate 20 percent of duty time to a Regional Female Offender Coordinator Collateral Duty Assignment.

This assignment is responsible for monitoring program usage, new programs, and trends, as well as meeting quarterly with the WASPB to discuss staffing and programming needs. However, observations and interviews indicated that all parties are not aware of responsibilities under the Program Statement nor that the regional coordinator position has been filled or its duties performed. Revisiting the fidelity of implementation may result in the need to update the manual and develop a more systemic strategic plan.

The role the regional and headquarters staff have in routine reviews, audits, and site visits is grounded in the core values and structure of BOP as an organization. The various groups outside of the WASPB that oversee and monitor operations have limited training or orientation to working with women, except for some staff who have the experience in their careers. Facility leadership cannot repair the facility culture and manage day-to-day operations without full support of the Western Regional Office and Headquarters in resolving administrative and operational barriers, such as human resources support and actions. A review of scheduled audits should be conducted with consideration of delaying some audits due to the current level of activity and priorities facing FCI-Dublin.

**Facility Leadership.** At the time of the assessment, the facility leadership team consisted of a warden who had been in place for three months. Two associate wardens who had been in place for approximately 10 months were pending transfer to other facilities. A new associate warden, with a background in programs, compliance, and working with women, had been named and was onsite for an initial two-week stint at the time of assessment, with permanent placement expected in July. Over the next few months, the facility will undergo a substantial shift in its leadership team, including two additional associate wardens, two captains, and an executive assistant who will serve as administrator over the camp. It will take time for this new team to get into rhythm and attention should be paid to communicating and modeling to staff so that accountability and structure will not be lost during this time of transition.

The new warden was welcoming, supportive, and engaged with the purpose and process of this assessment. While stretched by competing priorities, the warden demonstrated a strong commitment to creating order and rebuilding adherence to BOP policy. The warden is hopeful that the hyperactivity of reviews—from both BOP regional and headquarters staff, as well as this current assessment by TMG—will begin to slow down and allow the opportunity to respond to the external expectations and recommendations.

### **Leadership, Management, and Oversight Recommendations**

1. Provide a briefing with WASPB headquarters staff to the new BOP director to highlight major themes and recommendations.
2. The WASPB Program Statement needs full implementation and a review for updating current commitments and identifying roles and responsibilities with other BOP functions. Aspects of the plan are unfamiliar to some of the responsible parties.
3. Ensure the Female Offender Coordinator Collateral Duty Assignment is consistently staffed, and the duties are performed routinely.
4. Consider a strategy for FCI-Dublin, in collaboration with TMG, to provide an overview of the key themes and recommendations of this report to the staff at FCI-Dublin, such as holding a series of open sessions with a presentation of high-level themes and recommendations. The expectation would be inclusiveness of the union representative(s). TMG has had considerable success with this strategy, as it contributes positively to staff morale to have a feedback loop.

5. Under the general direction of WASPB, develop a facility-based work plan that realistically addresses competing priorities with input from the regional office. With a collaborative, well-communicated work plan, the facility is well positioned to make meaningful change with facility-wide support.
  - a. The work plan should be informed by various reports, regional input, national BOP guidance, and best practices in working with the female population.
  - b. The work plan should result in specific goals that build a gender-responsive culture of safety. A structure might include an 18-month to two-year plan, including short-term, mid-term, and long-range goals with identified resources and timelines required.
6. Immediately develop and enhance a process to onboard newly hired and appointed executive staff as a team and clarify and define roles and communication strategies. In addition, strengthen an onboarding process for all executive and supervisory staff, including the incoming camp administrator, OIA staff members, medical staff, and supervisors. This is a strategy TMG has successfully used with facilities with the level of disruption and transitions in leadership and supervisory positions as experienced at FCI-Dublin. This can be implemented through collaborative planning between TMG and BOP.
7. Commit to the continuity of leadership. Develop a plan to increase continuity of leadership on the facility management team and key managers for at least three years. If some individuals rotate out, ensure a core number of individuals have the ability to maintain fidelity of the strategic work plan.
8. Increase cross-functional collaboration across the facility and departments, such as between custody staff and programming and medical and mental health staff, as well as with community partners. Take the following into consideration:
  - a. Hold town hall meetings and staff recalls to increase leadership visibility and to build trust with staff.
  - b. Provide cross-discipline team-building opportunities, multi-disciplinary teams, cross-training, routine round tables, and continued relationship and trust building and problem solving.
  - c. Develop short-term multi-disciplinary workgroups to address specific charges, such as input on policy issues, process development or improvement, and staff morale enhancement.
9. Consistent with WASPB and the program statement, continue to work with and identify external stakeholders that have an interest in the response and strategic direction of FCI-Dublin and the systemic priorities for BOP women's facilities.
  - a. Review current strategies to manage information and update local and national external stakeholders.
  - b. Consider a high-level briefing approach to key stakeholders to include examples of recommendations from various reports that are embraced by BOP leadership.
  - c. In conjunction with the high-level briefing, conduct a media day where media are invited to tour the facility, thus demonstrating transparency and building of trust with not only stakeholders but also with staff.

## Reporting and Cultural Indicators

**Non-reporting Environment.** It was reported by staff and the population that what gets reported to whom and when has been a frustration. Disorder erodes trust and trust erodes reporting. A facility that does not have a culture that supports reporting erodes into a deeply dysfunctional environment—a non-reporting environment.

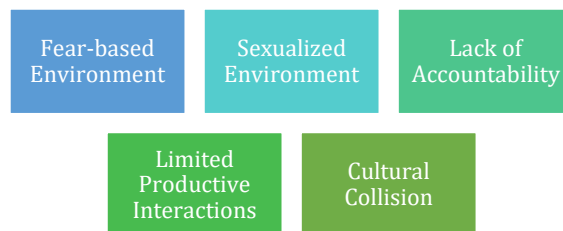


Figure 5: Reporting & Cultural Indicators

Research by Allen Beck indicates that staff sexual misconduct is correlated with measures of disorder, such as fights, fear, weapons, gang activity, lack of staff, possessions stolen, excessive use of force, and lack of rule enforcement. In women's facilities, lack of order can look quite different in how it emerges and more often than not it is more hidden or discrete than Beck's indicators of violence, weapons, and gang activity. Beck acknowledges that fear is correlated with measures of disorder and staff sexual misconduct. Fear-based cultures freeze staff reporting of rule violations or more serious activities of abusive behavior. It was reported from several staff about the sexualized environment that grew and the ability to report or address harassment was, for the most part, ineffective or absent. When staff experience a facility, regional office, and headquarters as being non-responsive, oversight functions and visits are less likely to reveal facility realities. When this is paired with staff who report retaliation, a fear-based environment emerges or is reinforced.

As noted above, the facility had recently passed a PREA audit. One explanation for why a facility can pass an audit under PREA and still not be sexually safe is the willingness of staff and the population to report. PREA requires and guides *how* to report but does not address the circumstances that effect if one *will* report. This is why establishing and sustaining a culture that reflects the values of BOP and the WASPB and adherence to a gender-responsive and trauma-informed response is important. If these principles are core to operations, the culture will be more likely to shift to a hope-based reporting culture.

**Sexualized Environment and Lack of Accountability.** A sexualized environment is an example of an erosion of trust. Staff reported that FCI-Dublin was a sexualized environment prior to the current incidents and staff have been walked off for misconduct in the past and allowed to resign or retire without consequence. Individual comments to the consultants would support this concern. Staff are feeling the pendulum swing and seeing intense scrutiny, yet they are left with some confusion as to why these incidents weren't taken as seriously in the past and why it had to reach the leadership level before staff misconduct would be disciplined and prosecuted.

The sexual misconduct perpetrated by the former warden had a significant impact on the facility, which was apparent and reported by both staff and the population. The former warden served as the PREA compliance manager, conducted training for staff on PREA, and was the facility representative for messaging zero tolerance of sexual misconduct while simultaneously perpetrating sexual violence. There was a mix of staff who were shocked by the allegations and some who were not. It was well known by some staff and the population that key leadership positions were involved in sexual misconduct. There was significant feedback demonstrating a lack of trust in the investigative process that leads to appropriate corrective action. It was reported that overall, he was seen as a good leader, which has further intensified the feeling of betrayal and deception by staff.

**Limited Productive Interactions.** With staff being stretched by workload, pandemic challenges, and compensating for staff shortages through augmentation, there has been limited time for staff to have meaningful interactions with the population. This has also led to inconsistencies and gaps in the role of unit managers, policy enforcement, and delays in the population receiving timely information and paperwork. These inconsistent interactions jeopardize safety by decreasing the quality of work,

diminishing trust that staff and the facility can meet basic needs, and the population exploring other avenues for getting basic needs met.

**Cultural Collision.** Facility leadership and BOP have made concentrated efforts to promote reporting amongst the population, which is commendable. However, this has also contributed to the perceived empowerment of the population to report against staff for doing their jobs. When staff fear that completing good operational practices, such as conducting a room shakedown, can jeopardize their jobs or be reported as retaliation, staff shy away from conducting these practices and the facility becomes less safe. This is especially true for newer staff that are still on probation and can lose their jobs if a certain number of complaints are filed during the probationary period. For instance, it was reported that a line staff member issued a shot for a rule violation and a supervisor dismissed the shot after the inmate raised issue with it. An explanation from the supervisor was not provided to the staff member. This pattern was affirmed by a number of staff. This practice discourages line staff and can lead to future reluctance to enforce rules without support from leadership. Increasing the confidence of staff to hold all individuals accountable appropriately and respectfully will require ongoing communication from leaders at all levels to reinforce support and coach staff on how to address these difficult interactions.

As an immediate corrective strategy, a temporary structure was established by central office for the population at FCI-Dublin to use that went directly to headquarters staff. While this can allow for monitoring of critical issues, facility staff felt this strategy was punitive and fed into eroded trust. Attention to the purpose and communication with facility leadership to resolve issues is critical moving forward. Collaborative discussions will ensure women are heard and that the staff is also empowered to manage the population.

## Reporting and Cultural Indicators Recommendations

1. Support a clear commitment to professionalism among staff and between staff and the women.
  - a. Identify clear consequences for staff for behavior with staff and with the women that demonstrates a lack of respect, such as profanity and disrespectful terminology, and clear avenues of reinforcement for behaviors that are respectful. Ensure expectations are included in staff training, performance evaluations, and supervisory development.
  - b. Emphasize respectful language to both staff and the women, holding individuals accountable in day-to-day interactions. Hold supervisors accountable for coaching staff and the women when disrespectful language is disregarded.
  - c. Ensure clear expectations of respectful interactions and communication are reflected in intake and orientation materials provided to the women.
2. From leadership levels, communicate with intentionality to keep staff, the population, and stakeholders informed. Commit to timely—daily, weekly, or monthly— systems of communication to significantly reduce anxiety and misunderstandings.
  - a. Ensure that communication systems have a feedback loop incorporated in them in order maintain leadership awareness of concerns and gain input on solutions to capitalize on the strengths of implemented processes and procedures.
  - b. Strive to include union representation and support.
  - c. Share operational and procedural adjustments, expectations, and provide clarification related to questions.
  - d. Communicate expectations about accurate and respectful communication.
  - e. Reinforce that leadership will support staff if they are operating within agency policy and the code of conduct to minimize anxiety about fairly and equitably holding the population accountable.
  - f. Address rumors and misperceptions, answer questions, identify areas of inconsistency, and engage problem solving.



3. Consider implementing a survey that is researched-based and validated, such as the Women's Correctional Safety Scale, developed and validated by ten facilities housing women, to gain perspectives of the women on sexual, physical, and emotional safety.
4. Determine the timeline of keeping the central office mailbox open and strongly consider returning the process for resolving facility-level issues to the facility.
5. Recommit to zero tolerance for abusive language and sexual misconduct and strengthen the presence and adherence to PREA and sexual safety through the following tasks:
  - a. Enhance professional development of PREA coordinators and supervisory chain of command in understanding the barriers that increase a non-reporting atmosphere.
  - b. Review the last 12 months of PREA incidents and documentation of oversight of retaliation. Explore strategies to monitor retaliation, consistent with PREA standards, that are grounded in building trust and encourages safety and reporting.
  - c. Add content to staff training on reporting environments. *See Staff Training Recommendations.*
  - d. Ensure the discipline process is fair, impartial, and includes attention to inappropriate language with actionable consequences.

## Staffing and Supervision

**Staff Morale.** Staff morale is extremely low, reportedly due to the level of attention the facility is receiving, staff shortages, augmentation, public and agency scrutiny, commuting time, cost of living, changes in leadership, influx of TDYs, and staff feeling undermined. Some staff painfully reported considering sacrificing tenure and pensions to leave BOP.

**Relocation of Supervisors.** The week following the onsite portion of this assessment, the regional office announced that many facility supervisors—over 20 staff members—would be reassigned to other BOP facilities. It was reported by staff that the decision was unexpected and heartbreaking. Staff are reportedly overwhelmed with thoughts on how to hold onto their jobs.

**TDYs.** It is routine practice for BOP to use temporary duty assignments. Due to several staff being removed or put on leave, FCI-Dublin had immediate vacancies to be filled. With this model, wardens are able to request staff from other BOP institutions for a temporary—ranging from two weeks up to three months—assignment. While this is helpful to address immediate needs, every institution has its own culture and norms and staff are arriving with limited time to acclimate, which contributes to inconsistencies in practice and rule enforcement, as well as an overall impression of instability. In particular, it is important for the assigned health care staff to have experience in women's needs. We are aware of the difficulty in staffing overall, including the medical staff. There are reports of tension between TDYs and homesteaders.

**Augmentation.** Due to staffing shortages, non-custody staff are routinely augmented into other security posts. Reportedly nine to 12 non-custody staff are being reassigned every day and all non-custody staff are being augmented one day a week without adjustment to normal workload, deadlines, or expectations. The routine reassigning of staff results in programs being canceled, vital functions being delayed, and a continued mounting of tasks that become unmanageable.

**PREA Compliance Managers.** It was reported that typically an associate warden serves as the PREA compliance manager in BOP facilities. It appears that the functions of this are largely deemed as

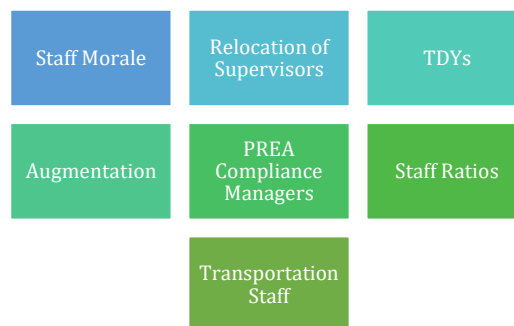


Figure 6: Staff and Supervision

administrative tasks that are viewed as a checklist. There remains substantial opportunity to reframe this trend and use PREA as a vehicle to influence a culture of safety and elevate the importance of a reporting culture that promotes accountability and professionalism.

**Staff Ratios.** At the time of this assessment, FCI-Dublin has approximately 70 female staff, with 22 in officer positions. Common practice developed by the National Institute of Corrections suggests minimally a 60/40 staff ratio for female staff working in women's institutions. In the current workforce, most correctional agencies recognize this ideal is not always possible; however, every effort is encouraged to recruit women who want to work with women. It is important to note, however, that having both professional and respectful male and female staff in the facility is vitally important to provide appropriate role models and replicate the experience women will have in the community. The recommended ratio does not diminish the role of male staff, rather accounts for same gender staff availability to address sensitive issues and provide supervision during sensitive times.

Some female staff reportedly are treated differently than male staff by the population. The population reported that they feel they are treated differently by the women and men. Some of the population tends to push back or challenge the female staff, especially younger staff. This is potentially due to lack of portrayed or perceived authority, disposition of staff, or insufficient training related to building trust and demonstrating or asserting influence instead of engaging in power struggles.

**Transportation Staff.** It was reported that there is an inadequate number of trained female staff members to support the facility transportation needs. Policy indicates that two trained staff members are to be present for each transport of an inmate, with at least one being female. To be in compliance with policy, at times, three staff members will need to go on a transport to satisfy two trained transport staff and at least one female staff member. Often, this female staff member is a non-custody staff member. This is a clear indication for more female custody staff to be trained in transportation to eliminate the misuse of resources and limit disruption to programming.

## Staffing and Supervision Recommendations

1. Ensure that staffing analyses and implementation of staffing models<sup>3</sup> support the operational requirements of working with women that take into account the following:
  - a. One female custody officer to be assigned to each housing unit for each shift.
  - b. One female custody supervisor on each shift.
  - c. One female staff escort during every transport of a female inmate.
  - d. Sufficient time for interaction with the population.
  - e. Sufficient coverage to allow for safe movement to and from, and monitoring of, programs, services, and activities.
  - f. Include clinical and non-custody.
  - g. Relief factor that accommodates the needs for same gender staff in key posts.
  - h. See **Attachment B Gender-responsive Staffing** for additional information to be considered for staffing women's facilities.
2. Implement a true unit team model.
  - a. Unit managers should have input on selection of unit team members.

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<sup>3</sup> Most staffing plan models used by prisons and jails were developed for male facilities and account only for custody staffing needs. That model neither leverages the full staffing resources available to a facility nor considers the unique needs of housing women. Women are relational and effective management mandates ongoing interaction. For instance, women typically use medical, mental health, and program services more intensively than male inmates and have program and parenting needs that differ from men. For a staffing plan to be useful, it must reflect all staffing resources required to operate a facility that promotes safety, dignity, and respect while encouraging positive outcomes for the women.



- b. Unit managers should have supervisory responsibility for all unit team staff, including custody and non-custody staff.
  - c. Engage team-building activities to ensure cohesion among unit team members.
  - d. Support routine communications to ensure consistency among the team.
- 3. Clarify the role and expectations of the PREA coordinator.
  - a. Ensure this position is filled by someone that is best suited for fully comprehending the implementation of the standards. The coordinator should have the most current understanding of the interpretation of the PREA Standards.
  - b. Ensure the implementation of PREA goes beyond an administrative checklist.
  - c. Dedicate the time needed for this position to carry out the vital functions of this role, including retaliation monitoring.
  - d. Ensure the continuation of PREA professional development and refresher training.
- 4. Consider developing positions at FCI-Dublin for the sole purpose of transporting women to medical appointments and emergencies.
  - a. Establish and fund necessary transportation positions.
  - b. When appropriate, recruit, interview, and hire transportation positions.
  - c. Identify and attend to transportation unit space and equipment needs.
  - d. Orient and train staff in their respective job responsibilities.
  - e. Develop a proposed work schedule for transportation positions that maximizes attendance and availability on days and times when most transportations occur; consider inclusion of a flexible shift that will cover unexpected trips without the need to incur unnecessary overtime or need for augmentation
  - f. Revise all applicable policy to reflect the requirement that the transport team include one female staff member and ensure that staffing relief factor accounts for this requirement.

## Human Resources

Hiring efforts have largely focused on the hiring of a new leadership team, which is important and deserving of a focused and thoughtful approach. However, staffing needs are apparent throughout the facility. At the time of assessment, it was reported that there were ten open custody staff positions, with five of those being staffed within the following month. However, the staffing numbers used reflect staff who are absent, including those who are AWOL or on military or administrative leave. Therefore, the numbers may not reflect reality. Further, it was reported that staff who are don't show up for a shift—considered AWOL—are often not reprimanded and put back on the schedule upon return because of the staffing shortage and challenges with hiring replacement staff.

Human resources have five to seven open positions posted continuously. It was reported that emphasis is placed on veterans, as this speeds up the hiring process since those individuals have already gone through federal vetting procedures. It was reported and observed that FCI-Dublin is in need of correctional officers, medical, and programming staff.

It was also reported that the staff discipline process is convoluted and can take years, as it includes many layers up through the regional director and Employee Law Branch, before disciplinary action can be imposed. This also contributes to staff perception that there is a lack of accountability when discipline is not swift and limits input from facility leadership. Though the task force was helpful with completing a number of open cases, many cases still remain on backlog. It was reported that EEO complaints are added to an existing class action suit, which has been active for several years, instead of addressed on its own merits. This pattern impacts the credibility of meaningful accountability.

## Human Resources Recommendations

1. Review EEO reports.
  - a. All EEO reports need to be reviewed for timeliness and appropriate resolution.
  - b. Reports should be reviewed for trends and followed up accordingly.
  - c. Seek additional support from regional and central office HR staff to quickly and efficiently address any backlog.
2. Support strengthening of hiring practices of supervisors and key positions to include “ranking factors” related to working with women.
3. Consider having WASPB provide input during executive staff position selections at the facility and participate in supervisor and executive staff interviews.
4. Consistent with the Executive Staff Paper Decision on Initiatives for Managing Women’s Facilities, consider raising the pay grades for Warden’s at secure female facilities.
5. Expedite the hiring and assignment of current vacancies, particularly for supervisors.
6. Implement retention strategies specific to FCI-Dublin, understanding that it is easier to keep current staff than recruit new staff. Provide an enriching experience to include the following:
  - a. Supervisors set regular, e.g., biweekly, monthly, quarterly, one-on-ones with subordinate staff to discuss organizational direction, individual performance, and professional development.
  - b. Manage by walking around—leadership schedule regular times during a week or month to visit with staff and check-in.
  - c. Ensure supervisors approach staff who are displaying signs of stress or physical or emotional fragility and ask how they can help.
  - d. Reinstitute the Staff Awards Program and demonstrate meaningful appreciation of merit. These programs go a long way with staff pride.
  - e. Regularly evaluate salary thresholds to ensure pay is competitive and supports retention.
7. Empower employees to realize a sense of accomplishment.
  - a. When possible, involve line staff in decision making and projects.
  - b. Put out a “suggestions” board or box to get feedback from staff.
  - c. Equip employees with the necessary tools, training, and support.
  - d. Ensure staff know how their work connects with BOP, WASPB, and FCI-Dublin’s vision and mission.
  - e. Develop an internal certificate program for staff who have gained new skills in working with justice involved women.
  - f. Acknowledge staff that use respectful language, model effective problem solving and conflict resolution, and exhibit consistent practice across shifts.
8. Review staff grievances.
  - a. A sampling of staff grievances related to a sexualized environment, supervisory intimidation, and abusive language should be reviewed from the past 24 months for timeliness and appropriate resolution.
  - b. Grievances should be reviewed for trends and followed up accordingly. Review for repetition of staff names, locations, and issues and appropriate action recommended based on findings.
  - c. Seek additional support from regional and central office human resources staff to quickly and efficiently address any backlog.

- d. Review should be conducted through technical assistance by an external agency.
9. Headquarters and regional office explore strategic approach to improve union involvement.
    - a. Management and union should work collaboratively to determine a more constructive environment for labor management meetings.
    - b. Is there a prepared agenda, sufficient avenues and attempts to resolve issues prior to reaching the grievance stage, agree upon reasonable time frames for physical plant issues to be prioritized and addressed.
    - c. Engage in regular communications beyond formal meetings, via newsletters, bulletin boards, suggestion boxes, etc.
  10. Review performance appraisals.
    - a. Policy and procedures should be reviewed to ensure objectives are being met.
    - b. Completed appraisals should be reviewed for appropriateness of appraisal completer and reviewer.
    - c. Determine if requests by employees to meet with reviewers were granted.
    - d. Determine how many evaluations were accepted and how many were contested.

## Staff Training

**Overall Training.** Discussions with all levels of leadership and staff indicate a clear desire for training to support consistent consideration of the gender of the population as well as to promote an environment of safety.

It was evident through observations and reported by both staff and inmates that more targeted training is needed for both skill-based and understanding of emerging topics in the field. Staff reported training to be insufficient, inconsistently offered, and difficult to access logistically. For instance, staff that have children may not be able to make arrangements to attend multi-day or out-of-area training events.



Figure 7: Staff Training

Training for staff has also been deeply impacted by staffing shortages and the pandemic, which postponed, canceled, or modified training offered to staff. This has limited the ability of the department to continue to build skills and the staff's ability to develop professionally. Based on reports and observations through this assessment, there are indicators that staff need more intensive training on core correctional practices, incident command structure, and effective supervision strategies specific to the female population.

**Correctional Training Officers.** At the time of assessment, four staff members had been appointed as correctional training officers and had yet to receive training on this function. The use of field training officers is critical for many reasons, such as the following:

- Modeling consistency in rule enforcement and operational practice
- Setting expectations for staff related to conduct and rapport
- Providing an avenue for new staff to ask questions that doesn't inundate other supervisors
- Creating an opportunity to track trends and areas where new staff may need additional training in the academy.

It will be important to ensure that staff appointed to these positions have a strong foundation in correctional practice, BOP policies, and specific nuances of a women's facility, as well as staff members who exemplify professionalism and respectful rapport with other staff and the inmate population.

**Gender-responsive Training.** Staff are provided initial training at the start of their work at a female facility and then annual refresher training in *Managing Female Offenders*. While the training materials provide basics on both subjects, it does not provide opportunity for group discussion or scenario-based activities to apply and prove understanding and integration of learned concepts. However, the refresher training provided in April 2022 included scenario practice, which staff were observed to engage in and appreciate.

Prior to the onsite portion of this assessment, representatives from central office and TMG collaborated to deliver targeted, in-person training to all staff, including executive and supervisory staff during the week of March 28–31, 2022. The training included guidance from BOP central office regarding expectations and opportunities in working within a research-based, gender-responsive model of corrections. Additionally the training included a review of policy and allowed for discussion and recognition of how important a culture of safety is to both the staff and the population.

TMG's experience was encouraging as the staff seemed to welcome the opportunity to participate in sharing and exploring their perceptions of facility safety, challenges that they experience, and the positive aspects of the facility. Though confused and frustrated with the current characterization of the facility, the media impact, and the high level of criticism they felt from outside stakeholders, most staff were responsive with many questions. During the week, a recurring theme was one of staff feeling embarrassed and disappointed in what they collectively experienced as a broad brush of negative views of the facility, which was particularly prominent with the long-term staff.

**Gender-responsive Wardens Training.** Since 2018 and through 2024, TMG is under contract to WASPB to provide training to all wardens who oversee federal female institutions. Training is tailored to include strategies for managing and supervising the female population, specific to sexual safety, implicit bias, and gender responsive practices. The training provides lecture and practical application of skills and knowledge related to PREA, trauma-informed practices, professional boundaries, and working with vulnerable populations. It is encouraged for the BOP to consider extending this opportunity to associate wardens and supervisors to further the commitment of the WASPB and expectations for women's institutions.

**Investigations Training.** The Special Investigative Support (SIS) Techs are in the union, and SIS training is conducted by BOP Correctional Services, which has reportedly been delayed due to COVID-19. The SIS Lieutenant is a manager and not in the union. This can create some unintended conflict in reporting allegations of staff abuse as union and non-union investigative staff address staff misconduct. There is a plan to dedicate two staff members from the Office of Internal Affairs to work directly at FCI-Dublin, which is not a typical model employed by BOP. The staff members will remain under the direction of headquarters with an elevated expectation to be accessible and serve as a resource for the warden. It is unclear how familiar these staff members will be with the specific nuances of a women's institution, and especially one with the history and needs of FCI-Dublin.

## Staff Training Recommendations

1. Under direction of the WASPB, guide a workplan initiative to develop a training matrix outlining an approach that will build the professional awareness and supervisory development necessary to support the BOP mission for women's facilities. Some training exists and needs support for implementation with fidelity; new training needs should be identified to address the range of necessary gender-responsive and trauma-informed operational best practices and skills to contribute to a well-run women's facility. The training plan should take the following into consideration:
  - a. Address pre-service, in-service, and annual refresher training.
  - b. Address key levels and types of staff, such as agency leadership, facility leadership, custody staff, and non-custody staff.

- c. Use a training matrix to prioritize training recommendations within this report and to include training commitments and requirements for the facility.
  - d. Revise agency policy on training to ensure all staff working at FCI-Dublin, including any overtime staff, contractors, or volunteers, receive training specific for working with women appropriate to their role and level of interaction with the women.
  - e. Include in the training matrix a menu of training opportunities to support gender-responsive and trauma-informed mental health and medical care, including specialty areas such as nursing, dentistry, and gynecological care, to build on the experience and expertise of clinical professionals.
  - f. See **Attachment C Gender-Responsive Training Matrix** for additional information on what a training matrix may include.
- 2. Provide FCI-Dublin leadership and supervisors training specific to leading and supervising staff who work in a women's facility, consistent with BOP policy and guidance from the WASPB. Consider using content that is currently approved and implemented through the national wardens and associate wardens training.
  - a. For best use of BOP resources, employ a training for trainers model to increase sustainability.
  - b. Update training material as needed and continue to provide training on a regular basis.
- 3. Ensure that all staff training in BOP reflects the difference in male and female inmates and operational best practices for male and female facilities to set the tone and expectations for work in women's facilities as different but legitimate.
- 4. Ensure that training supplements and newly developed trainings are designed for adult learners by creating training that is explanatory, relates to participants' immediate needs and surroundings, includes case studies or real-life examples, as well as opportunity for small group discussion, role playing, scenario practice, and case review.
- 5. Provide staff with training on professional boundaries and rapport building specific to work with women to include a section addressing trauma-informed language.
- 6. Operationalize training into clear expectations on staff performance evaluations to ensure accountability to trained concepts and skills, such as effective communication, de-escalation skills, professional rapport, and ongoing efforts to support rehabilitation and agency values.
- 7. Provide additional PREA training to managers, first line supervisors, PREA coordinators, line staff, regional office, and program managers in central office.
  - a. Train PREA coordinators in women's prisons to understand the PREA standards that have a gender responsive implication. Include a module on creating a reporting culture.
  - b. Review current PREA training for identifying objectives that speak to the importance of a reporting culture and define it.
- 8. Provide training to OIA staff on investigating custodial sexual abuse. (Note: This is scheduled for September 19-20, 2022.)
- 9. Consider a mapping process of sexual abuse allegations. The exercise should start with the reporting of an incident to a final disposition. Many agencies have found this strategy to be very helpful in discovering gaps, inconsistencies, or aspects of the process that need adjustment.

## Inmate Services

The intake and orientation, administrative remedy program, and overall programming and classification were assessed on a limited basis specific to the goals of this project. However, there are universal national best practices that serve to strengthen these areas and promote safety, which have been noted below. A more in-depth analysis of these areas may be warranted to align with the efforts of the facility and BOP.

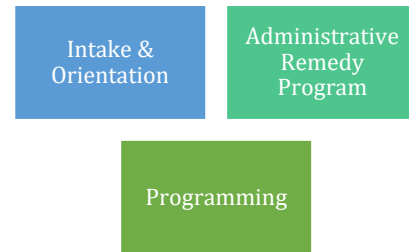


Figure 8: Inmate Services

**Intake & Orientation.** Intake and orientation are critical times for expressing the facility's commitment to safety, dignity, and respect by outlining expectations, answering questions, and discussing resources. Intake is completed at the Receiving and Discharge (R&D) area for processing and initial clearance by medical and unit Staff. Each individual is then assigned a counselor and case manager. The unit team will deliver orientation within seven days of arrival, with an in-depth institutional orientation from various department heads and executive staff within thirty days of arrival. Based on reports from leadership, staff, and the population, the information provided at orientation, in the handbook, posted in housing units, and communicated by staff is inconsistent and often evolving or conflicting.

**Administrative Remedy Program.** The Administrative Remedy Program at FCI-Dublin is typically overseen by an executive assistant. However, at the time of the assessment, that position was vacant, and it was unclear who was overseeing this program and data was not formally requested. The population has direct access to the warden and department heads through Main Line, as well as direct access to the warden by email. While this type of access is commendable, it may create an unrealistic expectation for response time and ability or appropriateness to remedy. Plus, there is opportunity to encourage line staff to resolve conflict prior to escalation.

**Programming.**<sup>4</sup> The population noted the residential drug treatment program as a significant strength, as it provided structure and an opportunity for change. While access to programming and recreation has been limited due to the pandemic, the population noted that the recreation areas are suitable and, in non-pandemic times, the programs offered are well participated in. Interviews with staff and the population indicated a strong desire to return to programming, particularly education. Note that through the course of this project the drug treatment program was dissolved, and replacement programming is forthcoming.

## Inmate Services Recommendations

1. Create a gender-specific handbook.
  - a. Ensure that the inmate handbook is available in Spanish and that other inmates with disabilities other than non-English speaking and deaf are accommodated and appropriately understand the orientation materials. These efforts should be coordinated in collaboration with WASPB.
  - b. Review written material provided to the women at orientation and the language in the handbook related to boundaries, relationships, and reporting.

<sup>4</sup> It was beyond the scope and purpose of this review to address the specific program offerings for fidelity or evaluation of purpose. The impact of COVID-19 and the disruption of staff assignments to include frequent "augmentation" of program staff appears to have significantly resulted in a high level of idleness, limited programming, and lack of consistent case management. The impact of these realities and the lean staffing after 2:00pm results in very limited interaction with staff and few outlets for the women. These conditions that create disconnection with the population and the staff in positive activities and programming can be critical factors in strengthening a "reporting culture" where sensitive information from either staff or the population can find trusted avenues for reporting.



2. Review inmate orientation materials and delivery strategies to ensure incoming women are aware of their role in reporting sexual abuse or inappropriate relationships.
  - a. Include a section on healthy boundaries and relationships.
  - b. Consider creating an orientation video produced with staff oversight by the women.  
Note: While onsite, the warden indicated support of this idea and immediately assigned a staff member to explore this possibility.
3. Consider developing a process for using the data on the top reasons for administrative remedies to proactively solve ongoing and emerging challenges through collaboration and development of potential solutions with staff and the population.
4. Revise policy and processes specific to after-action reviews to ensure the review and identification of trends in data analysis includes consideration of women's pathways to the facility; trauma history, including physical, sexual, and emotional abuse; relational orientation in the events leading up to the incident; and the response and follow-up.
5. Develop a consistent process for monitoring trends in data specific to discipline and grievances to allow leadership to proactively identify and address hot spots or challenges. Include in the process systems for communicating themes and engaging staff in solutions.
6. As pandemic restrictions ease, re-open leisure activities with structured classes and unstructured time.

## Facility Operations

**Location.** The location of the facility and the significant commute for most staff is a challenge for FCI-Dublin, with most staff traveling 45- to 90- minutes each way. Some staff report the commute creates extreme tension financially with routine vehicle maintenance and the cost of fuel, personally with time spent away from family and support networks, and on health with an increase in traffic tensions and sedentary time. A facility-adjacent option for staff housing is available and a number of staff members reportedly reside in these units. These modular units were not toured nor was the process or the criteria for approval, if any, reviewed. However, the option was reported as a strength by some staff.



Figure 9: Facility Operations

**Isolated Areas.** FCI-Dublin is a spread-out facility. A challenge to the facility layout includes many isolated areas. The facility is in the process of adding 200 cameras to address this challenge. The addition of cameras will be helpful, but not a substitute for supervisory presence.

**Facility Schedule.** The facility operates largely on a 6:00am to 2:00pm schedule, with most movement and programming occurring during these hours and the majority of staff on this shift. This model is largely in response to the surrounding area and significant traffic during commute times. However, the significant decrease in programming and movement time can lead to inmate idleness and staff complacency—both of which have significant impacts to safety.

It is important to understand the effect of the hourly, daily, weekly, and monthly activities that impact staffing resources at a women's facility. The following are key activities to review for women's facilities:

- Dining—typically meals take longer due to mannerisms and the relational nature of women.
- Showers—typically the time necessary for showers and hygiene is longer for women.
- Programming—women have differing needs related to both attending and processing programming and trauma that requires additional staff time and supervision.



- Medical and Mental Health—typically women have more appointments than men.
- Family Visitation—time needed for visitation and the intensity of supervision needs typically differ in women's facilities due to the relational nature of women and the importance of healthy and supportive connections among family, children, significant others, and the community.
- Transportation—needs may be greater for women than men due to outside medical and court appointments and require at least one female staff member on each transport.
- Medication Lines—typically women have more medication needs than men, requiring more staff resources for administration and monitoring.

## **Facility Operations Recommendations**

1. In alignment with BOP data and analysis practices, consider conducting a brief staff survey in collaboration with the union and human resources to determine what, if anything, could be implemented to ease the tension created by the commute, congestion, and cost of living in the local area, such as audio book subscriptions, discounts on gym memberships, and carpooling groups.
2. Explore opportunities for programs after 2:00pm to reduce idleness of the population.
3. Develop a consistent facility schedule that considers the time necessary for key activities, such as dining, showers, programming, medical and mental health, visitation, transportation, and medication distribution.
4. Continue implementation of cameras.
5. Review criteria for identifying contraband. It was reported that the potential contraband in the mailroom was not consistent with BOP practice.
6. Review the use of SHU in facilities housing women. For the purpose of this project, a full review of the special housing unit was not conducted. However, understanding the trends and uses of this unit will provide useful information in how the facility responds to behavioral patterns of the women.
7. Review security practices, such as OC Spray and the need for stab resistant vests in a women's institution. Alert the union of the review and all impacted parties.

## **Satellite Camp Prison—Dublin**

The assessment activity onsite included an opportunity to tour the Satellite Camp Prison, hold informal focus groups with the population, and interact with the limited number of staff on duty. The themes emerging from those activities are summarized by urging the BOP to continue to increase the administration for all aspects of operations and commitments to define the camp as minimum security.

The camp seemed critically understaffed, with one staff member reportedly out sick for an extended time, one was in training, and another split between the main facility and the camp. One officer was in the control center, one in the kitchen, and an education staff member were the only staff members in the camp during the visit in a facility that houses nearly 200 inmates. The physical structure, layout, and lack of staffing or sense of control creates a vulnerable combination of opportunity.

The conversations with the women were intense, with particular concern for some of the elderly and those with limited mobility. Issues were related to assigned beds, e.g., upper bunks for women not able to negotiate being in the upper bunk. There were also reported concerns related to environmental

health, quality of the air systems, and limited access to healthcare. Majority of the women reported that it was difficult to get information or help on questions about daily living or about their cases.

### **Satellite Camp Prison—Dublin Recommendations**

1. In the course of this project, a Camp Administrator has been named and is onsite. Ensure the newly established Camp Administrator position is supported and continue the positive review of staffing needs at the satellite camp.
2. Conduct a thorough assessment of the operations of the camp.
3. Evaluate the status of case management by reviewing a sampling of cases.
4. Review any grievances related to bed assignments and the criteria followed to include health care considerations.
5. Review sanitation and complaints of mold on the lower floor.
6. Review programmatic opportunities and align with the mission of the Camp.
7. Review frequency of visits from regional office representatives in areas of psychology, programs, and health care services and increase oversight, if indicated, for a six-month period.
8. Engage the WASPB in recommitting and clarifying the mission of the Camp.

# Attachment A: Summary of Recommendations

## Leadership, Management, and Oversight Recommendations

1. Provide a briefing with WASPB headquarters staff to the new BOP Director to highlight major themes and recommendations.
2. The WASPB Program Statement needs full implementation and a review for updating current commitments and identifying roles and responsibilities with other BOP functions. Aspects of the plan are unfamiliar to some of the responsible parties.
3. Ensure the Female Offender Coordinator Collateral Duty Assignment is consistently staffed, and the duties are performed routinely.
4. Consider a strategy for FCI-Dublin, in collaboration with TMG, to provide an overview of the key themes and recommendations of this report to the staff at FCI-Dublin, such as holding a series of open sessions with a presentation of high-level themes and recommendations. The expectation would be inclusiveness of the union representative(s). TMG has had considerable success with this strategy, as it contributes positively to staff morale to have a feedback loop.
5. Under the general direction of WASPB, develop a facility-based work plan that realistically address competing priorities with input from the regional office. With a collaborative, well-communicated, and work plan, the facility is well-positioned to make meaningful change with facility-wide support.
  - a. The work plan should be informed by various reports, regional input, national BOP guidance, and best practices in working with the female population.
  - b. The work plan should result in specific goals that build a gender-responsive culture of safety. A structure might include an 18-month to 2-year plan, including short term, mid-term, and longer-range goals with identified resources and timelines required.
6. Immediately develop and enhance a process to onboard newly hired and appointed executive staff as a team and clarify and define roles and communication strategies. In addition, strengthen an onboarding process for all executive and supervisory staff, including the incoming Camp Administrator, OIA staff members, medical staff, and supervisors. This is a strategy TMG has successfully used with facilities with the level of disruption and transitions in leadership and supervisory positions as experienced at Dublin. This can be implemented through collaborative planning between TMG and BOP.
7. Commit to the continuity of leadership. Develop a plan to increase continuity of leadership on the facility management team and key managers for at least three years. If some individuals rotate out, ensure a core number of individuals have the ability to maintain fidelity of the strategic work plan.
8. Increase cross-functional collaboration across the facility and departments, such as between custody staff and programming and medical and mental health staff, as well as with community partners. Take the following into consideration:
  - a. Hold town hall meetings and staff recalls to increase leadership visibility and to build trust with staff.
  - b. Provide cross-discipline team building opportunities, multi-disciplinary teams, cross-training, routine round tables, and continued relationship and trust building and problem solving.

- c. Develop short-term multi-disciplinary workgroups to address specific charges, such as input on policy issues, process development or improvement, and staff morale enhancement
- 9. Consistent with WASPB and the program statement, continue to work with and identify external stakeholders that have an interest in the response and strategic direction of FCI-Dublin and the systemic priorities for BOP women's facilities.
  - a. Review current strategies to manage information and update local and national external stakeholders.
  - b. Consider a high-level briefing approach to key stakeholders to include examples of recommendations from various reports that are embraced by BOP leadership.
  - c. In conjunction with the high-level briefing, conduct a media day where media are invited to tour the facility, thus demonstrating transparency and building of trust with not only stakeholders but also with staff.

### **Reporting & Cultural Indicators Recommendations**

1. Support a clear commitment to professionalism among staff and between staff and the women.
  - a. Identify clear consequences for staff for behavior with staff and with the women that demonstrate a lack of respect, such as profanity and disrespectful terminology, and clear avenues of reinforcement for behaviors that are respectful. Ensure expectations are included in staff training, performance evaluations, and supervisory development.
  - b. Emphasize respectful language to both staff and the women holding individuals accountable in day-to-day interactions. Hold supervisors accountable for coaching staff and the women when disrespectful language is disregarded.
  - c. Ensure clear expectations of respectful interactions and communication are reflected in intake and orientation materials provided to the women.
2. From leadership levels, communicate with intentionality to keep staff, the population, and stakeholders informed. Commit to timely—daily, weekly, or monthly—systems of communication to significantly reduce anxiety and misunderstandings.
  - a. Ensure that communication systems have a feedback loop incorporated in them in order maintain leadership awareness of concerns and gain input on solutions to capitalize on the strengths of implemented processes and procedures.
  - b. Strive to include union representation and support.
  - c. Share operational and procedural adjustments, expectations, and provide clarification related to questions.
  - d. Communicate expectations about accurate and respectful communication.
  - e. Reinforce that leadership will support staff if they are operating within agency policy and the code of conduct to minimize anxiety about fairly and equitably holding the population accountable.
  - f. Address rumors and misperceptions, answer questions, identify areas of inconsistency, and engage problem solving.
3. Consider implementing a survey that is researched-based and validated, such as the Women's Correctional Safety Scale, developed and validated by ten facilities housing women, to gain perspectives of the women on sexual, physical, and emotional safety.
4. Determine the timeline of keeping the central office mailbox open and strongly consider returning the process for resolving facility-level issues to the facility.
5. Recommit to zero tolerance for abusive language and sexual misconduct and strengthen the presence and adherence to PREA and sexual safety through the following tasks:

- a. Enhance professional development of PREA Coordinators and supervisory chain of command in understanding the barriers that increase a non-reporting atmosphere.
- b. Review the last 12 months of PREA incidents and documentation of oversight of retaliation. Explore strategies to monitor retaliation, consistent with PREA standards, that are grounded in building trust and encourages safety and reporting.
- c. Add content to staff training on reporting environments. *See Staff Training Recommendations.*
- d. Ensure the discipline process is fair, impartial, and includes attention to inappropriate language with actionable consequences.

## Staffing and Supervision Recommendations

1. Ensure that staffing analyses and implementation of staffing models<sup>5</sup> support the operational requirements of working with women that take into account the following:
  - a. One female custody officer to be assigned to each housing unit for each shift.
  - b. One female custody supervisor on each shift.
  - c. One female staff escort during every transport of a female inmate.
  - d. Sufficient time for interaction with the population.
  - e. Sufficient coverage to allow for safe movement to and from, and monitoring of, programs, services, and activities.
  - f. Include clinical and non-custody.
  - g. Relief factor that accommodates the needs for same gender staff in key posts.
  - h. See **Attachment B Gender-Responsive Staffing** for additional information to be considered for staffing women's facilities.
2. Implement a true unit team model.
  - a. Unit Managers should have input on selection of unit team members.
  - a. Unit Managers should have supervisory responsibility for all unit team staff, including custody and non-custody staff.
  - b. Engage team-building activities to ensure cohesion among unit team members.
  - c. Support routine communications to ensure consistency among the team.
3. Clarify the role and expectations of the PREA Coordinator.
  - a. Ensure this position is filled by someone that is best suited for fully comprehending the implementation of the standards. The Coordinator should have the most current understanding of the interpretation of the PREA Standards.
  - b. Ensure the implementation of PREA goes beyond an administrative checklist.
  - c. Dedicate the time needed for this position to carry out the vital functions of this role, including retaliation monitoring.
  - d. Ensure the continuation of PREA professional development and refresher training.
4. Consider developing positions at FCI-Dublin for the sole purpose of transporting women to medical appointments and emergencies.
  - a. Establish and fund necessary transportation positions.
  - b. When appropriate, recruit, interview, and hire transportation positions.
  - c. Identify and attend to transportation unit space and equipment needs.

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<sup>5</sup> Most staffing plan models used by prisons and jails were developed for male facilities and account only for custody staffing needs. That model neither leverages the full staffing resources available to a facility nor considers the unique needs of housing women. Women are relational and effective management mandates ongoing interaction. For instance, women typically use medical, mental health, and program services more intensively than male inmates and have program and parenting needs that differ from men. For a staffing plan to be useful, it must reflect all staffing resources required to operate a facility that promotes safety, dignity, and respect while encouraging positive outcomes for the women.

- d. Orient and train staff in their respective job responsibilities.
- e. Develop a proposed work schedule for transportation positions that maximizes attendance and availability on days/times when most transportations occur; consider inclusion of a flexible shift that will cover unexpected trips without need to incur unnecessary overtime or need for augmentation
- f. Revise all applicable policy to reflect the requirement that the transport team include one female staff member and ensure that staffing relief factor accounts for this requirement.

## **Human Resources Recommendations**

1. Review EEO reports.
  - a. All EEO reports need to be reviewed for timeliness and appropriate resolution.
  - b. Reports should be reviewed for trends and followed up accordingly.
  - c. Seek additional support from regional and central office HR staff to quickly and efficiently address any backlog.
2. Support strengthening of hiring practices of supervisors and key positions to include “ranking factors” related to working with women.
3. Consider having WASPB provide input during executive staff position selections at the facility and participate in supervisor and executive staff interviews.
4. Consistent with the Executive Staff Paper Decision on Initiatives for Managing Women’s Facilities, consider raising the pay grades for Warden’s at secure female facilities.
5. Expedite the hiring and assignment of current vacancies, particularly for supervisors.
6. Implement retention strategies specific to FCI-Dublin, understanding that it is easier to keep current staff than recruit new staff. Provide an enriching experience to include the following:
  - a. Supervisors set regular, e.g., biweekly, monthly, quarterly, one-on-ones with subordinate staff to discuss organizational direction, individual performance, and professional development.
  - b. Manage by walking around—leadership schedule regular times during a week or month to visit with staff and check-in.
  - c. Ensure supervisors approach staff who are displaying signs of stress or physical or emotional fragility and ask how they can help.
  - d. Reinstitute the Staff Awards Program and demonstrate meaningful appreciation of merit. These programs go a long way with staff pride.
  - e. Regularly evaluate salary thresholds to ensure pay is competitive and supports retention.
7. Empower employees to realize a sense of accomplishment.
  - a. When possible, involve line staff in decision making and projects.
  - b. Put out a “suggestions” board or box to get feedback from staff.
  - c. Equip employees with the necessary tools, training, and support.
  - d. Ensure staff know how their work connects with BOP, WASPB, and FCI-Dublin’s vision and mission.
  - e. Develop an internal certificate program for staff who have gained new skills in working with justice involved women.
  - f. Acknowledge staff that use respectful language, model effective problem solving and conflict resolution, and exhibit consistent practice across shifts.

8. Review staff grievances.
  - a. A sampling of staff grievances related to a sexualized environment, supervisory intimidation, and abusive language should be reviewed from the past 24 months for timeliness and appropriate resolution.
  - b. Grievances should be reviewed for trends and followed up accordingly. Review for repetition of staff names, locations, and issues and appropriate action recommended based on findings.
  - c. Seek additional support from regional and central office human resources staff to quickly and efficiently address any backlog.
  - d. Review should be conducted through technical assistance by an external agency.
9. Headquarters and regional office explore strategic approach to improve union involvement.
  - a. Management and union should work collaboratively to determine a more constructive environment for labor management meetings.
  - b. Is there a prepared agenda, sufficient avenues and attempts to resolve issues prior to reaching the grievance stage, agree upon reasonable time frames for physical plant issues to be prioritized and addressed.
  - c. Engage in regular communications beyond formal meetings, via newsletters, bulletin boards, suggestion boxes, etc.
10. Review performance appraisals.
  - a. Policy and procedures should be reviewed to ensure objectives are being met.
  - b. Completed appraisals should be reviewed for appropriateness of appraisal completer and reviewer.
  - c. Determine if requests by employees to meet with reviewers were granted.
  - d. Determine how many evaluations were accepted and how many were contested.

### **Staff Training Recommendations**

1. Under direction of the WASPB, guide a workplan initiative to develop a training matrix outlining an approach that will build the professional awareness and supervisory development necessary to support the BOP mission for women's facilities. Some training exists and needs support for implementation with fidelity; new training needs should be identified to address the range of necessary gender-responsive and trauma-informed operational best practices and skills to contribute to a well-run women's facility. The training plan should take the following into consideration:
  - a. Address pre-service, in-service, and annual refresher training.
  - b. Address key levels and types of staff, such as agency leadership, facility leadership, custody staff, and non-custody staff.
  - c. Use a training matrix to prioritize training recommendations within this report and to include training commitments and requirements for the facility.
  - d. Revise agency policy on training to ensure all staff working at FCI-Dublin, including any overtime staff, contractors, or volunteers, receive training specific for working with women appropriate to their role and level of interaction with the women.
  - e. Include in the training matrix a menu of training opportunities to support gender-responsive and trauma-informed mental health and medical care, including specialty areas such as nursing, dentistry, and gynecological care, to build on the experience and expertise of clinical professionals.
  - f. See Attachment C Gender-Responsive Training Matrix for additional information on what a training matrix may include.
2. Provide FCI-Dublin leadership and supervisors training specific to leading and supervising staff who work in a women's facility, consistent with BOP policy and guidance from the WASPB.



Consider using content that is currently approved and implemented through the national wardens and associate wardens training.

- a. For best use of BOP resources, employ a training for trainers model to increase sustainability.
  - b. Update training material as needed and continue to provide training on a regular basis.
3. Ensure that all staff training in BOP reflects the difference in male and female inmates and operational best practices for male and female facilities to set the tone and expectations for work in women's facilities as different but legitimate.
4. Ensure that training supplements and newly developed trainings are designed for adult learners by creating training that is explanatory, relates to participants' immediate needs and surroundings, includes case studies or real-life examples, as well as opportunity for small group discussion, role playing, scenario practice, and case review.
5. Provide staff with training on professional boundaries and rapport building specific to work with women to include a section addressing trauma-informed language.
6. Operationalize training into clear expectations on staff performance evaluations to ensure accountability to trained concepts and skills, such as effective communication, de-escalation skills, professional rapport, and ongoing efforts to support rehabilitation and agency values.
7. Provide additional PREA training to managers, first line supervisors, PREA coordinators, line staff, regional office, and program managers in central office.
  - a. Train PREA coordinators in women's prisons to understand the PREA standards that have a gender responsive implication. Include a module on creating a reporting culture.
  - b. Review current PREA training for identifying objectives that speak to the importance of a reporting culture and define it.
8. Provide training to OIA staff on investigating custodial sexual abuse. (Note: This is scheduled for September 19-20, 2022.)
9. Consider a mapping process of sexual abuse allegations. The exercise should start with the reporting of an incident to a final disposition. Many agencies have found this strategy to be very helpful in discovering gaps, inconsistencies, or aspects of the process that need adjustment.

## **Inmate Services Recommendations**

1. Create a gender-specific handbook.
  - a. Ensure that the inmate handbook is available in Spanish and that other inmates with disabilities other than non-English speaking and deaf are accommodated and appropriately understand the orientation materials. These efforts should be coordinated in collaboration with WASPB.
  - b. Review written material provided to the women at orientation and the language in the handbook related to boundaries, relationships, and reporting.
2. Review inmate orientation materials and delivery strategies to ensure incoming women are aware of their role in reporting sexual abuse or inappropriate relationships.
  - a. Include a section on healthy boundaries and relationships.
  - b. Consider creating an orientation video produced with staff oversight by the women.  
Note: While onsite, the warden indicated support of this idea and immediately assigned a staff member to explore this possibility.

3. Consider developing a process for using the data on the top reasons for administrative remedies to proactively solve ongoing and emerging challenges through collaboration and development of potential solutions with staff and the population.
4. Revise policy and processes specific to after-action reviews to ensure the review and identification of trends in data analysis includes consideration of women's pathways to the facility; trauma history, including physical, sexual, and emotional abuse; relational orientation in the events leading up to the incident; and the response and follow-up.
5. Develop a consistent process for monitoring trends in data specific to discipline and grievances to allow leadership to proactively identify and address hot spots or challenges. Include in the process systems for communicating themes and engaging staff in solutions.
6. As pandemic restrictions ease, re-open leisure activities with structured classes and unstructured time.

### **Facility Operations Recommendations**

1. In alignment with BOP data and analysis practices, consider conducting a brief staff survey in collaboration with the union and human resources to determine what, if anything, could be implemented to ease the tension created by the commute, congestion, and cost of living in the local area, such as audio book subscriptions, discounts on gym memberships, and carpooling groups.
2. Explore opportunities for programs after 2:00pm to reduce idleness of the population.
3. Develop a consistent facility schedule that considers the time necessary for key activities, such as dining, showers, programming, medical and mental health, visitation, transportation, and medication distribution.
4. Continue implementation of cameras.
5. Review criteria for identifying contraband. It was reported that the potential contraband in the mailroom was not consistent with BOP practice.
6. Review the use of SHU in facilities housing women. For the purpose of this project, a full review of the special housing unit was not conducted. However, understanding the trends and uses of this unit will provide useful information in how the facility responds to behavioral patterns of the women.
7. Review security practices, such as OC Spray and the need for stab resistant vests in a women's institution. Alert the union of the review and all impacted parties.

### **Satellite Camp Prison—Dublin Recommendations**

1. In the course of this project, a Camp Administrator has been named and is onsite. Ensure the newly established Camp Administrator position is supported and continue the positive review of staffing needs at the satellite camp.
2. Conduct a thorough assessment of the operations of the camp.
3. Evaluate the status of case management by reviewing a sampling of cases.

4. Review any grievances related to bed assignments and the criteria followed to include health care considerations.
5. Review sanitation and complaints of mold on the lower floor.
6. Review programmatic opportunities and align with the mission of the Camp.
7. Review frequency of visits from regional office representatives in areas of psychology, programs, and health care services and increase oversight, if indicated, for a six-month period.
8. Engage the WASPB in recommitting and clarifying the mission of the Camp.

## Attachment B: Gender-responsive Staffing

Most staffing plan models used by prisons and jails were developed for male facilities and account only for custody staffing needs. That model, however, neither leverages the full staffing resources available to a facility, nor considers the unique needs of housing women. Women are relational and effective management mandates ongoing interaction; they typically use medical, mental health, and program services more intensively than male inmates; they have program and parenting needs that differ from their male counterparts; and facilities were often not designed to address the needs of women. For a staffing plan to be useful, it must reflect all staffing resources required to operate a facility that promotes safety, dignity, and respect while encouraging positive outcomes for the women.

Physical Plant	Facility Schedule
Custody Staff Complement	Staff Gender
Program Needs	PREA
Medical Services	Mental Health Services

One approach to conducting a gender-responsive staffing analysis is to use the mathematical models that already exist to calculate security staffing needs and overlay gender-specific considerations to best understand the full staffing complement required for the facility. The following staffing plan considerations support the development of plans that more adequately staff women's facilities when they are used as an overlay to traditional methods of calculating staffing needs.

**Physical Plant.** Physical plant may hinder or enhance effective supervision. While the facility may not be able to undertake capital improvements to address structural challenges, awareness of these challenges allows for mitigation with direct supervision resources. It is important that facilities consider the following to determine adequate staffing capabilities to determine if additional staff are needed due to the following:

- Blind spots
- Isolated areas
- Camera placement
- Mirror placement
- Population size
- Facility size
- Halls, corridors, and closets
- Inmate movement
- Housing unit configuration
- Program space configuration

**Facility Schedule.** It is important to understand the effect of the hourly, daily, weekly, and monthly activities that impact staffing resources at a women's facility. The following are key activities to review for women's facilities:

- Dining: Typically meals take longer due to the relational nature of women.
- Showers: Typically the time necessary for showers and hygiene is longer for women.
- Programming: Women have differing needs related to both attending and processing programming and trauma that requires additional staff time and supervision.
- Medical and Mental Health: Typically women have more appointments than men.
- Family Visitation: Time needed for visitation and the intensity of supervision needs typically differ in women's facilities due to the relational nature of women and the importance of healthy and supportive connections among family, children, significant others, and the community.
- Transportation: Staff at least one female staff member on transport teams for women. Transportation needs may be greater for women than men due to outside medical and court appointments.
- Medication Lines: Typically women have more medication needs than men, requiring more staff resources for administration and monitoring.

**Custody Staff Complement.** Women tend to be less violent than men; therefore, there is often a misconception that fewer security staff are needed. In fact, women's facilities may need more staff, not less, given the differing roles they play in women's facilities. For example,

- Security staff are often required to engage more frequently with women to deescalate relationship-driven issues.
- Security staff often play an important role in ensuring that women get the programs and services that they need. This may be especially true in units, such as restricted housing, mental health, and intake, as women will have decreased access to outside support and relational contact (e.g., family, significant others, and children), which may in turn increase anxiety.
- Enough staff must be available to manage movement to and from the scheduled activities.
- Enough staff must be available to help manage and supervise programs, activities, and services.

**Male to Female Staff Ratios.** In addition to ensuring that there are female supervisors and security staff on each shift, practitioners recommend that the male to female staff ratio in women's facilities approximate 40 percent male and 60 percent female. It is important to note, however, that having both professional and respectful male and female staff in the facility is vitally important to provide appropriate role models and replicate the experience women will have in the community. The recommended ratio does not diminish the role of male staff, rather accounts for same gender staff availability to address sensitive issues and provide supervision during sensitive times.

**Medical and Mental Health Services.** Women typically use medical and mental health services at a higher rate than their male counterparts, which indicate an importance to consider the following:

- If grievances indicate pattern of long wait times or poor service
- How many women are seen by medical daily and how many are unable to make appointments due to long wait times
- How long inmates wait to see a medical provider for specialized care (e.g., dentists, obstetrician, gynecologist, dentist, optometrist, etc.).
- Anticipated demand for services based on classification, medical, and mental health needs

**Consistency with PREA Standards.** PREA standards require a number of operational practices with the goal of preventing sexual abuse and harassment and enhancing sexual safety. For that reason, it is important that the facility consider what is necessary to

- Restrict cross-gender viewing
- Restrict cross-gender searches
- Promote privacy within appropriate security considerations
- Ensure female-specific posts are considered in places where pat searches occur regularly, where privacy is needed, in visitation, restricted housing, and for transport of women
- Consider roving female staff that can be available to perform emergency searches and provide support as needed

**Programming Needs.** Women tend to have more intensive program needs than their male counterparts. For that reason, it is important that facilities consider the following:

- How many inmates are actively engaged in programs or jobs at the facility
- The level of inmate idleness and the negative impact on safety and security
- The length of waiting lists for programming that are required by the courts or assessed need
- The length of waiting lists for programming that is desired by the women
- Program needs not being addressed and accompanying staffing requirements
- Provision of programming opportunities specifically related to addressing trauma, healthy relationships, and parenting skills
- Provision of programming in restricted housing
- Criteria for the ideal program plan and the staff needed to run current and new programs to develop an accurate program staffing model

## Attachment C: Training Matrix

<b>Women's Services Training Matrix</b>	<b>Executive Staff</b>	<b>Captain</b>	<b>Lieutenant</b>	<b>Officer</b>	<b>Unit Team</b>	<b>Non-Custody</b>	<b>Investigators</b>	<b>Medical Staff</b>	<b>Mental Health Director</b>	<b>Clinical Staff</b>	<b>Contractors</b>	<b>Volunteers</b>
Women's Services for Agency Executives												
Managing a Women's Facility												
Supervisory Practices in Women's Facilities												
Gender-responsive Practice in Women's Facilities <sup>6</sup>												
Coaching Staff for Successful Work with Women												
PREA and Creating Safety for Women Offenders												
PREA and Working with Women Offenders (Refresher training)												
Trauma Informed Practice <sup>7</sup>												
Camera Management												
Disciplinary Practice												
Use of Force												
Cross-gender Supervision												
Trauma Informed Searches												
Basic Communication Strategies for Working with Women <sup>8</sup>												
Advanced Communication Strategies for Working with Justice Involved Women												
Strategies for Supporting Behavior Change												
Specialized PREA Investigations for Women's Facilities												
Medical and Mental Health Considerations for Working in Women's Facilities												
Critical Response Team Training for Women's Facilities												
Gender-responsive Case Management												
Gender-responsive Reentry												

<sup>6</sup> Consider contractors and volunteers for inclusion or a modified and shortened curriculum that is customized to their role.

<sup>7</sup> Consider contractors and volunteers for inclusion or a modified and shortened curriculum that is customized to their role.

<sup>8</sup> Consider contractors and volunteers for inclusion or a modified and shortened curriculum that is customized to their role.