

**California Coalition for Women Prisoners, et al.,  
v.  
U.S Federal Bureau of Prisons, et al., Consent Decree  
Case No. 4:23-cv-04155-YGR**

**2<sup>nd</sup> Quarterly Status Report  
July 1 – September 30, 2025**

**Submitted by  
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Northern District Court of California**

**December 30, 2025**

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<b>Senior Monitor &amp; Team</b>	
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## Introduction & Background

**Introduction:** This section serves as an introduction to the 2nd Quarterly Status Report, July 1 – September 30, 2025, on the status of the United States (U.S.) Federal Bureau of Prisons (BOP) implementation of the *California Coalition for Women Prisoners v. U.S. BOP* Consent Decree. This report includes recommendations and refers to a “a course of action that the Monitor believes would assist the BOP in complying with this Consent Decree.”<sup>1</sup> Additional recommendations may also be added in subsequent reports as additional information and assessments are conducted by the Monitoring Team. Furthermore, while this report is dated December 30, 2025, only information from July 1 - September 1 - 30, 2025 is included.

The Senior Monitor extends her appreciation to the BOP staff for their cooperation and support in providing information and assistance related to the various Paragraphs of this report. Appreciation is also extended to Class Counsel for their support and continued communication regarding concerns raised by Class Members.

**Monitoring Activities:** During this quarterly monitoring period, the Senior Monitor’s priorities centered on assessing factual findings related to the various Paragraphs of the Consent Decree. Onsite monitoring tours of FCI Tallahassee (July 24 – 25, 2025) and FCI/FPC Victorville (August 18 – 19, 2025) were conducted during the 2nd quarter. The activities conducted during this period include, but were not limited to, the following:

- Review of BOP program statements, records, audits, reports, tracking logs, formal and informal training materials, online training content, the Code of Federal Regulations (C.F.R.), Title 28<sup>2</sup> and other relevant documents;
- Participation in meetings with BOP staff, Class Counsel, the Assistant United States Attorney (AUSA) and the Court;
- Interviews with BOP and public health staff, and Class Members;
- Class Counsel Memorandums, July 2, 2025, August 12, 2025, August 15, 2025, and September 30, 2025;
- Review of emails from Class Members, BOP staff, Class Counsel and the AUSA; and
- Onsite visits of FCI Tallahassee and FCI/FPC Victorville, and interviews of BOP staff and Class Members while onsite.

**Observations Related to Complaints Received, 1<sup>st</sup> & 2<sup>nd</sup> Quarters 2025:**<sup>3</sup> The chart on the following page provides a synopsis of the number of complaints received, by type, during the first six months (two quarters) of monitoring, and includes the following observations:

- Between April and September, complaints related to the Prison Rape Elimination Act (PREA) varied, but ultimately declined from 13 to 5, representing a 62% reduction. Credit issues also declined from 22 to 9, representing a 59% reduction.

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<sup>1</sup> Paragraph 99, Consent Decree

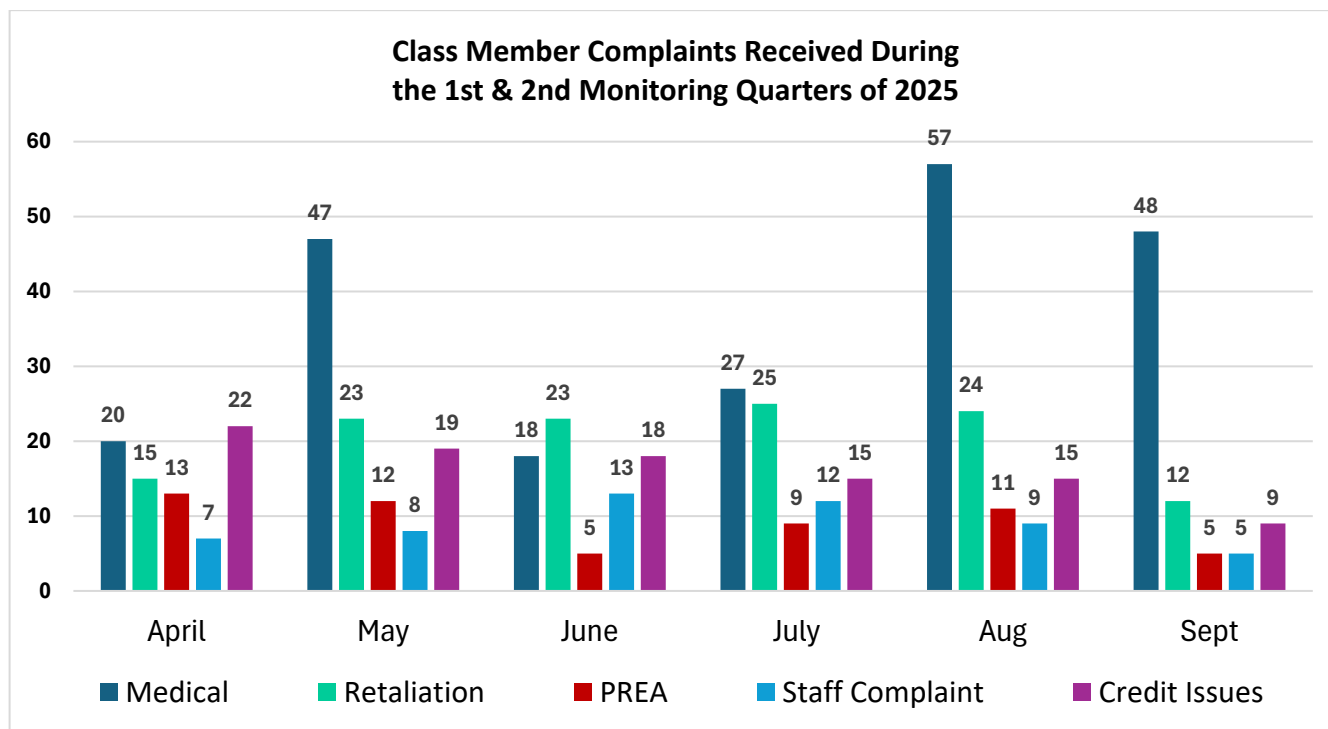
<sup>2</sup> [eCFR :: Title 28 of the CFR -- Judicial Administration](#)

<sup>3</sup> Class Member complaints and inquiries were received via email and Class Counsel memorandums. This chart does not include complaints received during onsite monitoring tours of BOP facilities.

- Retaliation complaints increased from 15 in April to 24 in August, representing a 60% increase. The complaints peaked in July at 25. However, retaliation complaints declined by 50% between August (24) and September (12).
- Complaints related to medical care varied significantly during the first six months of monitoring, with complaints peaking in August at 57 from a low of 18 in June. However, medical complaints more than doubled (240%) between April (20) and September (48).
- Complaints about staff (not including retaliation complaints) varied during this six-month period; however, as of September they are the lowest (5) they have been since the inception of the Consent Decree.

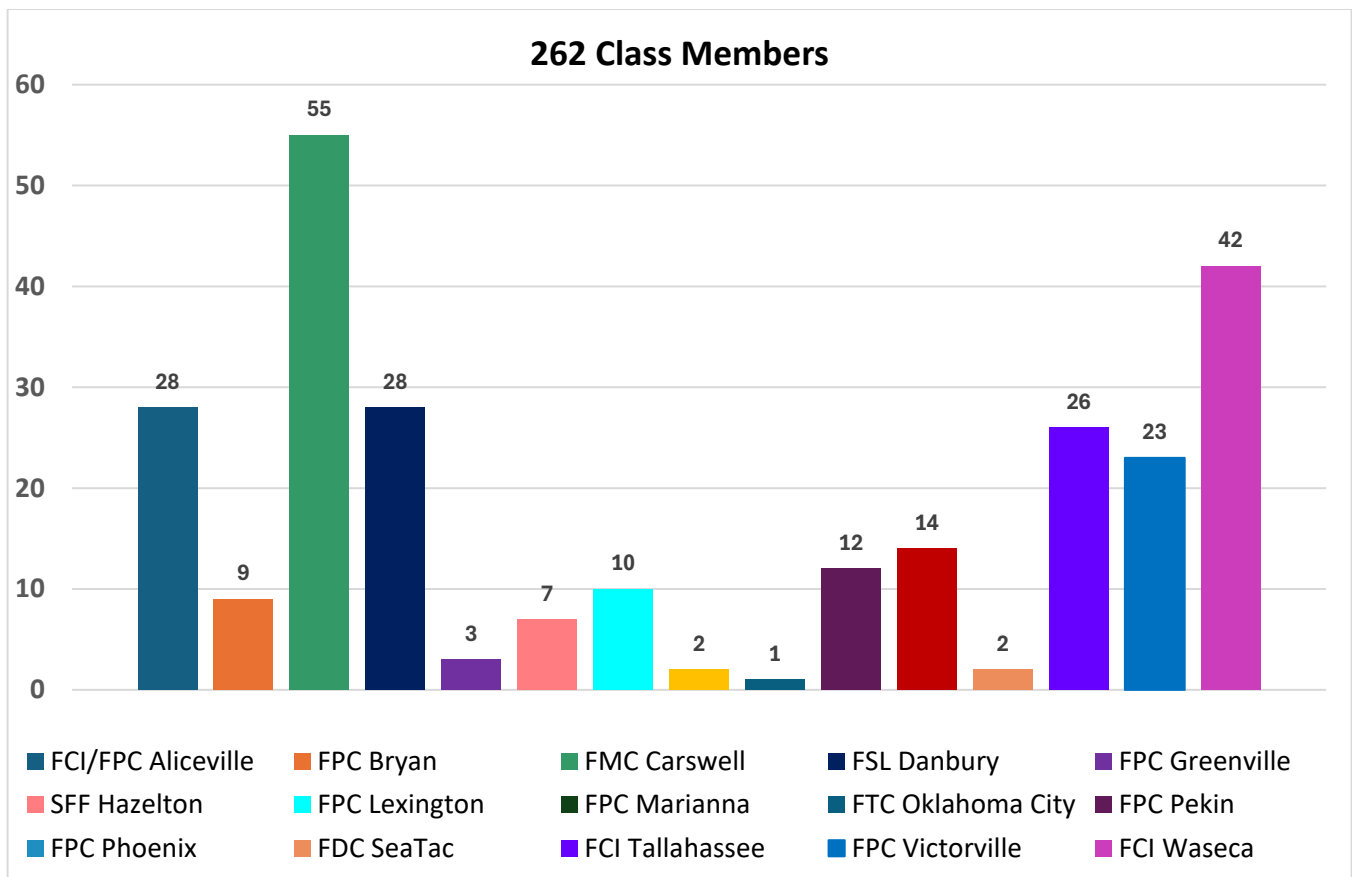
Total Complaints Received During the 1 <sup>st</sup> & 2 <sup>nd</sup> Monitoring Quarters of 2025							
Category	April	May	June	July	Aug	Sept	Totals
Medical	20	47	18	27	57	48	217
Retaliation	15	23	23	25	24	12	122
PREA	13	12	5	9	11	5	55
Staff Complaints	7	8	13	12	9	5	54
Credit Issues	22	19	18	15	15	9	98
<b>Total Complaints</b>	<b>77</b>	<b>109</b>	<b>77</b>	<b>88</b>	<b>116</b>	<b>79</b>	<b>546</b>

The chart below reflects the same information in a different format.



**Reporting:** The release of the 2<sup>nd</sup> quarterly monitoring report was delayed, in part, as the Senior Monitor focused her attention on BOP’s 37-page and Class Counsel’s 22-page written response to the draft August 2025 monthly monitoring report, not including additional comments to the confidential attachments. Although the Consent Decree expressly requires a review period for the quarterly monitoring reports, the Senior Monitor has continued to allow for a comment period for all draft monthly monitoring reports since the inception of the Consent Decree. However, the extensive comments and subsequent follow-up discussions, in response to BOP and Class Counsel’s written feedback, have continued to cause delays in the release of all reports.

**Class Members:** The following chart reflects the number of Class Members in BOP custody, by facility.<sup>4</sup>



**NOTE:** BOP facilities in the *legend* above are depicted in the order shown in the *bar chart* (from left to right).

<sup>4</sup> Reflects population roster generated by BOP and provided to the Senior Monitor on September 30, 2025.

Bureau of Prison Facility Acronyms			
FCI	Federal Correctional Institution	FSL	Federal Satellite Low
FDC	Federal Detention Center	FTC	Federal Transfer Center
FMC	Federal Medical Center	MDC	Metropolitan Detention Center
FPC	Federal Prison Camp	SFF	Secure Female Facility

**NOTE:**

- The terms “**facility**” and “**institution**” are used interchangeably throughout this document.
- Related paragraphs have been consolidated in this status report for clarity; however, several may be reported separately in future reports as needed.
- The section and subsection letters and numbers referenced in the chart on the following page are based on the structure of the Consent Decree.
- The reference to *Monitors* refers to two or more members of the Monitoring Team, including the Senior Monitor.
- BOP Program Statements, reference documents and metrics for each of the Paragraphs assessed, are noted in the attachment titled, *Program Statements and Reference Documents, July – September 2025*. Some metrics may also be mentioned in this report for emphasis.

## Assessment & Recommendations

### A. Medical Health Care (Part 1)

#### 2. Monitoring of Staffing Capacity

**36.** As a daylight provision only, BOP shall provide the Monitor and Class Counsel with monthly reports on the medical and mental health care staffing levels at all BOP facilities where Class Members are designated. The Monitor shall review this information and make quarterly reports on the subject of medical and mental health care staffing levels at all BOP facilities where class members are designated. If requested by BOP, the report will include recommendations for addressing low staffing levels.

#### Metrics:

- Class Member and BOP Staff Interviews
- Class Member Email Complaints
- BOP Staffing Report, September 26, 2025
- Program Statements and Reference Documents, July – September 2025, Attachment

**Assessment:** Staffing levels continue to directly affect timely access to care across both medical and mental health services. During this reporting period, vacancies remain in several key positions, including nursing, mid-level providers, and mental health clinicians. These shortages have contributed to delays in sick call responses, medication refills, and follow-up appointments, particularly for Class Members requiring chronic care management or psychiatric stabilization.

Although recruitment efforts are ongoing, the continued reliance on temporary or contract staff has contributed to limited continuity of care. Impaired communication between custody, medical, and mental health teams continues to be a concern. The lack of consistent coverage also increases the burden on existing staff, leading to fatigue and a reduced ability to conduct meaningful clinical follow-up. Sustained staffing improvements remain critical to achieving compliance with minimum standards of care and to ensure continuity of treatment for all Class Members.

**Medical Staff Vacancies:** Staffing vacancies across BOP facilities housing Class Members continue to significantly impact the delivery of medical care and the ability of BOP to maintain consistent clinical operations. The data on the following page summarizes the status of authorized, filled, and vacant positions by facility, along with vacancy percentages for both Health Service and Public Health Service positions during this reporting period.

Overall vacancy rates remain high across several BOP facilities, with FCI Tallahassee (52.63%) and FCI/FPC Victorville (57.14%) experiencing the most severe shortages in core health services positions. Public Health Service vacancies are also notable at FCI Tallahassee (50%), FPC Victorville (80%), and FCI Waseca (100%). These persistent staffing deficits have a direct effect on access to care, timeliness of sick call, medication management, and follow-up care. Facilities relying heavily on overtime and temporary staff continue to report challenges in maintaining clinical consistency and continuity of care.

<b>Medical Staff Vacancies by BOP Facility</b>				
<b>BOP Facilities</b>	<b>Authorized Positions</b>	<b>Total Filled</b>	<b>Total Vacant</b>	<b>Vacancy Rate</b>
FCI/FPC Aliceville	26	17	9	34.62.%
Public Health Service <sup>5</sup>	2	2	0	0%
FPC Bryan	14	9	5	35.71%
Public Health Nurse	4	3	1	25.00%
FMC Carswell	126	87	39	30.95%
Public Health Service	17	15	2	11.76%
FSL Danbury	16	11	5	31.25%
Public Health Nurse	9	7	2	22.22%
FPC Greenville	27	23	4	14.81%
Public Health Service	1	1	0	0%
SFF Hazelton	53	38	15	28.30%
Public Health Nurse	4	4	0	0%
FPC Lexington	96	66	30	31.25%
Public Health Service	20	18	2	10.0%
FPC Marianna	21	16	5	23.81%
Public Health Service	3	2	1	33.33%
FDC Miami	21	16	5	23.81%
Public Health Service	3	3	0	0%
FTC Oklahoma City	28	25	3	10.71%
Public Health Service	3	3	0	0%
FPC Pekin	22	16	6	27.27%
Public Health Service	2	2	0	0.0%
FPC Phoenix	18	12	6	33.33%
Public Health Service	3	3	0	0.0%
FCI Tallahassee	19	9	10	52.63%
Public Health Service	8	4	4	50%
FPC Victorville	63	27	36	57.14%
Public Health Service	5	1	4	80.0%
FCI Waseca	24	19	5	20.83%
Public Health Service	1	0	1	100%

<sup>5</sup> BOP has over 3,000 health care positions, including approximately 550 Public Health Service Commissioned Officers detailed from the Department of Health and Human Services.

## Evaluation of Issues:

- Staffing vacancies across BOP facilities housing Class Members continue to significantly impact the delivery of medical care and the ability of BOP to maintain consistent clinical operations.
- The existing sick call policy and process do not give visibility into the full spectrum of steps required to receive care, making it extremely difficult to determine timeliness and appropriateness of care.
- Discordance exists between policies and operational practices in the area of sick call.
- Care for Class Members with level 1 - 2 mental health issues is uncoordinated - with prescribers and with programmatic/therapists staff working independently of each other.
- Discordance exists between policies and operational practices in the area of sick call.

## Recommendations:

- BOP should increase their efforts to fill clinical staff vacancies or increase and extend temporary assignments to provide access to care consistent with Program Statements.
- BOP should reconsider adopting a different process for sick call - one that includes tracking requests irrespective of how they are received (i.e., paper, electronic), percentage of cases referred by triage nurses to providers, and the time it takes to triage requests and schedule with a provider, etc.
- BOP should encourage better coordination of care between mental health and medical services providers -- particularly for Class Members prescribed mental health medication by medical services providers.

## A. Mental Health Care (Part 2)

### 2. Monitoring of Staffing Capacity

**36.** As a daylight provision only, BOP shall provide the Monitor and Class Counsel with monthly reports on the medical and mental health care staffing levels at all BOP facilities where Class Members are designated. The Monitor shall review this information and make quarterly reports on the subject of medical and mental health care staffing levels at all BOP facilities where class members are designated. If requested by BOP, the report will include recommendations for addressing low staffing levels.

#### Metrics:

- Class Member and BOP Staff Interviews
- Class Member Email Complaints
- BOP Staffing Report, September 26, 2025
- Program Statements and Reference Documents, July – September 2025, Attachment

**Assessment:** Mental health staffing vacancies remain significant within several BOP facilities, with FCI Waseca (57.14%) and SFF Hazelton (45.16%) experiencing the highest vacancy rates. These shortages are contributing to ongoing delays in assessments, limited therapeutic contact, and reduced capacity to conduct timely follow-ups and crisis interventions. Although some facilities, such as FCI Tallahassee (5.5%) and FPC Bryan (8.3%), are nearing adequate staffing levels, overall the system continues to face recruitment and retention challenges. The reliance on temporary or collateral-duty staff reduces consistency in clinical care and contributes to burnout among remaining clinicians. Sustained hiring and retention initiatives are essential to ensure stable and effective mental health services across all BOP facilities.

**NOTE:** Although there are previous reports, in prior monitoring months, of Class Member mental health contacts, there are no evaluations related to the quality of these encounters to date, as the Monitoring Team does not currently include a Mental Health Expert.

The following data summarizes authorized, filled, and vacant positions for mental health staff across BOP facilities housing Class Members, along with calculated vacancy rates for the reporting period.

<b>Mental Health Vacancy Rates at BOP Facilities Where Class Members are Housed</b>				
<b>BOP Facility</b>	<b>Authorized Position</b>	<b>Total Filled</b>	<b>Vacant</b>	<b>Vacancy Rate %</b>
FCI/FPC Aliceville	13	10	3	23.08%
FPC Bryan	12	11	1	8.33 %
FMC Carswell	35	25	10	28.57%
FSL Danbury	26	22	4	15.38%
FPC Greenville	16	13	3	18.75%
SFF Hazelton	31	17	14	45.16%
FPC Lexington	29	24	5	17.24%
FPC Marianna	16	14	2	12.5%
FDC Miami	9	6	3	33.33%
FTC Oklahoma City	8	7	1	12.5%
FPC Pekin	11	8	3	27.27%
FPC Phoenix	15	11	4	26.67%
FCI Tallahassee	18	17	1	5.56%
FPC Victorville	29	22	7	24.14%
FCI Waseca	14	6	8	57.14%

**Evaluation of Issues:**

- Staffing shortages within Mental Health Services continue to present challenges in timely access to care, continuity of treatment, and the ability to provide individual and group therapy. There remain barriers to care for Class Members who do not thrive in group settings and who are not ill enough to be provided 1:1 therapy per BOP policy. This practice leads to increased utilization of medical services, increased complaints, and has the potential to contribute to an increase in poor behavior among Class Members.

**Recommendations:**

- BOP has not requested specific staffing recommendations from the Monitoring Team, as the Consent Decree provision is for daylight purposes only.

## A. Medical and Mental Health Care

### 3. Third Party Care

**37.** As a daylight provision only, BOP shall provide the Monitor with monthly reports about the wait times for outside provider care for Class Members after May 1, 2024. The Monitor shall review this information and make quarterly reports on wait times for care. The Monitor may comment regarding whether BOP is managing Outside Provider relationships to promote timeliness of care for Class Members after May 1, 2024. The Monitor shall review BOP's notice posted in English and Spanish regarding the process for securing Outside Provider care. At a Class Member's or at Class Counsel's written request, BOP shall, Consistent with Security, communicate with Class Members regarding the status of their request or referral for Outside Provider Care, including the estimated wait time.

#### Metrics:

- BOP's Electronic Medical Records System (BEMR)
- Confidential Third-Party Wait Times Report, July 1 – September 30, 2025, Paragraph 37, BOP Report
- Program Statements and Reference Documents, July – September 2025, Attachment

**Assessment:** As of this reporting period, there are 20 Class Members awaiting specialty clinic appointments. The longest documented wait time dates back to April 24, 2025, and remains pending. These appointments include referrals for cardiology, gynecology, gastroenterology, orthopedics, and other specialty services. BOP provided a report which listed 21 pending outside appointments. The date of the appointments in the community were only provided for 9 of the 21 entries. Using the earliest date the appointment was requested, the Medical Experts calculated an estimated 7.2-month average wait time with a range between 3 and 11 months.

In general, Class Members are in various stages of the referral and scheduling process. Some are awaiting appointment confirmation, while others are pending completion of required diagnostic testing prior to a specialty evaluation. These prolonged delays reflect systemic challenges in both coordination and scheduling between facilities where Class Members are housed and with outside specialty providers.

Appointment scheduling and the medical tasks associated with the pre-diagnostic phase (i.e., labs, imaging, and preparatory studies) also contribute to the overall delay. Lastly, when coordination and the sharing of medical studies with third-party providers is inefficient, it further prolongs wait times for the provision of specialty services. This specific area remains a one of the most critical barriers to timely specialty care access for Class Members requiring ongoing specialty management.

## Evaluation of Issues:

- Wait times for specialty care are exacerbated when Class Member housing changes occur - requiring the process to be reinitiated. Although the Medical Experts acknowledge that geographical variations impact wait times, BOP should mitigate exacerbating this process further by ensuring care across facilities is coordinated and in particular, after a Class Member is transferred to another facility.
- Exacerbation of wait times for comprehensive specialty evaluation continues to be an issue as a result of a lack of coordination of medical records (sharing lab and diagnostic results with the specialist).
- A lack of alternative access to specialists for providers continues to exist (i.e., peer-to-peer support, eConsultation).

## Recommendations:

- Expand the use of telehealth for pre-specialty diagnostics for Class Members. Where feasible, preliminary evaluations such as lab reviews, EKGs, or pre-procedure consults should be conducted via telemedicine or onsite by existing clinical staff. This approach could substantially reduce external scheduling delays.
- Consider implementing a provider-to-provider asynchronous specialty consultation system (eConsultation) to allow BOP medical providers to obtain specialty advice from a specialist without the Class Member requiring an in-person appointment. This type of system will help to reduce wait times associated with accessing specialty care, build BOP provider capacity, decrease costs and labor, and the time-consuming process related to the transport of Class Members to off-site facilities.
- Implement centralized tracking of specialty referrals for Class Members. Each facility should maintain a real-time referral tracking log identifying the request date, approval date, scheduling status, and completion date. This would enable early identification of bottlenecks and support better accountability.
- Strengthen communication with Class Members. Improved communication on the status of appointments would reduce Class Member uncertainty and repeated inquiries that burden staff. Furthermore, providing written updates or notices to Class Members when delays occur could enhance transparency and trust.

## A. Medical & Mental Health Care

### 4. Provision of Care in Primary Language

**38.** To the extent feasible, BOP shall provide medical and mental health care to Class Members in their primary language at all medical and mental health encounters. This may be accomplished using Language Line Services (LLS) for on-demand, over-the-phone language interpretation services. To the maximum extent feasible, the use of interpreters shall comply with confidentiality requirements, including minimizing the use of AICs as translators and AICs shall only be used as translators for Spanish in emergency situations. The Monitor shall review, and include in quarterly reports, any reports of Class Members being denied access to care in their primary language.

#### Metrics:

- Program Statements and Reference Documents, July – September 2025, Attachment

**Assessment:** During this reporting period, only one complaint was received from a Class Member regarding the lack of provision of care in her primary language. The Class Member reported she urgently needs prescription eyeglasses as the lack of lenses is causing her headaches. She also experiences pain in her feet when wearing shoes and stated that medical staff dismiss her concerns without examining her. She further expressed concerns about the overall quality of medical care, noting that nurses treat non-English speakers poorly. Additionally, during Medical Experts interviews, non-English proficient Class Members relate inconsistent use of the language line, with reliance on peers to serve as interpreters.

#### Evaluation of Issues:

- In reviewing documented encounters in BEMR, the Medical Expert noted an increase in documented use of the language line.

#### Recommendations:

- Class Members should have all clinical encounters in their primary language pursuant to the Consent Decree. This requirement should be emphasized with clinical staff.
- Provide clinical staff with a list of Class Member alerts in BEMR for those who are limited English proficient.
- Post the translation service line contact information in all areas where care is provided.

## A. Medical & Mental Health Care

### 5. Access to Rape Crisis Centers

40. The Monitor shall review, and include in quarterly reports, any reports of Class Members being unable to access services from Rape Crisis Centers.

#### Metrics:

- Class Member Interviews
- Class Member Email Complaints
- Sexual Assault Prevention and Intervention Booklet, February 2025
- BOP PREA Homepage Website
- Review of BEMR
- Program Statements and Reference Documents, July – September 2025, Attachment

**Assessment:** During this quarter, there were no reports of Class Members who were unable to access services through the Rape Crisis Centers; however, complaints were received regarding the lack of access to a confidential telephone line.

To ensure Class Members are aware of and have access to confidential services provided through the Rape Crisis Center, BOP should issue a written notification to Class Members. Proof of practice should be provided to the Senior Monitor.

#### Evaluation of Issues:

- A review of a Class Member medical files, in the Psychology Data System (PDS) section of BEMR, revealed a PREA Administrative Note dated August 6, 2025, which stated the following:

*“FPC Bryan Rape Crisis Center’s Information is:*

*Agency: Sexual Assault Resources Center*

*Contact Information: 979-731-1000*

*To place a call, you must first add the number to your approved phone list utilizing the TRULINCS system. Be advised calls are recorded and could be subject to monitoring.”*

This information was provided to a Class Member at FPC Bryan on August 6, 2025, during an encounter with a representative from psychology.

Per Paragraph 39, Class Members shall have access to *“confidential unmonitored calls (in a confidential setting).”* However, the language in the Administrative Note implies this is not the case

given that it states, “...calls are recorded and could be subject to monitoring.” This issue was highlighted in the first quarterly report, as this information contradicts that which is provided to Class Members in the Sexual Assault Prevention and Intervention Booklet (dated February 2025) and during the mandatory Admissions and Orientation.

Class Members not having access to confidential unmonitored telephone calls to the Rape Crisis Center can have a chilling effect on the use of the services provided by the Center. Furthermore, Class Members are likely to refrain from utilizing the telephone for services of this nature if they believe their communication may be monitored.

### **Recommendations:**

- BOP should develop and disseminate a memorandum to all staff assigned to facilities housing Class Members, reiterating that Rape Crisis Center telephone calls are confidential and unmonitored. BOP has advised they will send a written reminder to all BOP facilities where Class Members are housed indicating that calls to Rape Crisis Centers shall be confidential and unmonitored.
- A memorandum should also be posted in the Trust Fund Limited Inmate Computer System (TRULINCS) for Class Members. The memorandum should inform Class Members of the confidentiality guaranteed through the Consent Decree, and further advise them of their right to file complaints with the Senior Monitor when confidential access is not available.

## C. Staff Abuse & Retaliation

### 3. Reports of Staff Physical or Sexual Abuse

65. The Monitor shall include in quarterly reports an assessment of BOP's responses to reports of staff physical and sexual abuse towards Class Members and recommendations for corrective action, including changes to designations, changes to housing and job placements, provision of medical and/or mental health treatment, and other measures necessary to protect Class Members. The Monitor may make these recommendations prior to issuing a quarterly report on an emergency basis.

#### Metrics:

- BEMR Clinical Encounters and PDS
- Quarterly Reports of Sexual and Physical Abuse
- Program Statements and Reference Documents, July - September 2025, Attachment

Allegations of Sexual & Physical Abuse	
Sexual Abuse	11
Physical Abuse	3
<b>Total</b>	<b>14</b>

**Assessment:** There were 11 reports of sexual abuse and 3 related to physical abuse during this quarter.

**NOTE:** Although there are reports of Class Member mental health contacts, there are no evaluations related to the quality of these encounters as to date the Monitoring Team does not include a Mental Health Expert.

#### Sexual Abuse Reports:

**Log Number 2025-061-P:** Class Member reported a claim of sexual abuse while she was in transit from a Transfer Center. Once she arrived at her designated facility, the National PREA Coordinator contacted Psychology Services with a request that they follow up with the Class Member to see how she is doing. On July 22, 2025, a Sexual Abuse Intervention V (SAIV) was completed. Class Member was evaluated and offered outside services as well as services at the facility. She expressed interest in outside services. In response, the facility made contact with an outside service provider on her behalf.

**Log Number 2025-126-P:** Class Member reported a claim of sexual abuse to the Senior monitor via an email dated July 18, 2025. A review of documentation in the Class Member's medical file revealed a SAIV was conducted on July 15, 2025. Since then, the Class Member has continued to engage in ongoing mental health appointments.

**Log Number 2025-130-P:** Class Member reported a claim of sexual abuse on July 25, 2025, to the Senior Monitor. A review of her medical file revealed she reported to Psychology Services the same day and was

evaluated. She was offered advocacy and institutional services, which she declined.<sup>6</sup> Class Member stated she utilizes services from psychology monthly and felt these interactions are sufficient.

**Log Number 2025-135-P-R:** Class Member reported a claim of sexual abuse to the Senior Monitor on August 2, 2025. She was seen by Psychology Services on August 4, 2025, after a referral from the National PREA Coordinator. She was evaluated and offered advocacy and institution services, which she declined.

**Log Number 2025-138-P:** Class Member reported to Psychology Services a claim of sexual abuse on July 7, 2025. It was reported to the Senior Monitor on August 1, 2025, via the PREA Retaliation Monitoring Report. Class Member was evaluated and offered Rape Crisis Center services. She declined services, including those offered at the facility. Since then, the Class Member has had two additional clinical appointments.

**Log Number 2025-139-P:** Class Member reported a claim of sexual abuse to Psychology Services on July 24, 2025. This was reported to the Senior Monitor on August 1, 2025, via the PREA Retaliation Monitoring Report. Class Member was evaluated and provided the telephone number to the Rape Crisis Center and information regarding services provided at the Center. She continues to engage in ongoing mental health appointments.

**Log Number 2025-142-P:** Class Member reported a claim of sexual abuse to the Senior Monitor on August 7, 2025. She previously reported a sexual abuse claim on June 2, 2025, involving staff in the Medical Department (Class Member receives services at the Medical Department on a regular basis). Additionally, the Senior Monitor recently received an email from the Class Member stating she received confirmation that the investigation into her sexual abuse complaint had been completed, with a conclusion of “not sustained.” A review of the Class Member’s medical file revealed no documentation indicating that the Class Member had been seen by Psychology Services following her allegations.

Class Member stated that since then, when she reports to the Medical Department, the staff member who was the subject of her original complaint, glares and makes her feel uncomfortable. The Senior Monitor is recommending that this Class Member be re-designated to a facility commensurate with her custody level and her needs to prevent the potential for future claims of retaliation.

**Log Number 2025-169-P:** Class Member reported a claim of sexual abuse to the Senior Monitor on September 9, 2025. A review of her medical file revealed no documentation of a SAIV near this date or thereafter. Class Member recently transferred to another BOP facility.

**Log Number 2025-176-P:** Class Member reported a claim of sexual abuse to the Senior Monitor on September 11, 2025. She was seen by Psychology Services on September 9, 2025, while on suicide watch

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<sup>6</sup> “Advocacy” services refer to outside community mental health services. “Institutional” services refer to services available through the facility’s mental health department.

in SHU. She was offered advocacy and institutional psychology services. Class Member indicated the Psychologist advised her she would have limited access to these services given that she was in SHU. Class Member would like to continue accessing services through psychology via the weekly and monthly SHU rounds and at her request. She was released from SHU on September 19, 2025. No further mental health contacts are documented in her file.

**Log Number 2025-179-P:** Class Member reported a claim of sexual abuse to the Senior Monitor on September 30, 2025. A review of the SAIV in the Class Member's medical file revealed an appointment with Psychology Services on October 2, 2025. Class Member was evaluated and provided with the telephone number to the local Rape Crisis Center. She was further advised of the services provided by the Center and offered ongoing care.

**Log Number 2025-192-P:** Class Member reported a claim of sexual abuse to Psychology Services on September 22, 2025. It was reported to the Senior Monitor on October 1, 2025, via the PREA Retaliation Monitoring Report. Class Member was evaluated and offered the Rape Crisis Center's telephone number and advised of its services. She has since been scheduled for a follow-up mental health appointment since that time.

### **Physical Abuse Claims:**

**Log Number 2025-159-PA:** Class Member reported a claim of physical abuse to the Senior Monitor on August 15, 2025. A review of her medical file revealed no medical or mental health encounters around that date. Additionally, a review of the Class Member's Electronic Inmate Central File revealed no Incident Reports issued during that time period.

**Log Number 2025-162-PA:** Class Member reported a claim of physical abuse to the Senior Monitor on August 27, 2025, while she was in the SHU. She was seen on the same day by a representative from the Medical Department and assessed. The injuries noted on the assessment were consistent with the Class Member's complaint to the Senior Monitor.

**Log Number 2025-180-PA:** Class Member reported a claim of physical abuse to the Senior Monitor on September 21, 2025. The Class Member was seen and assessed by medical on the same day. The injuries noted on the assessment were consistent with the Class Member's complaint to the Senior Monitor.

Class Member was placed in the SHU on September 10, 2025, and as of the end of September 2025, was still housed at this location. Class Member is at the mental health care level 2, and has received eight Incident Reports since placement in SHU. Although mental health staff at the facility have been involved in the treatment of this individual, SHU staff have been left to control the Class Member's erratic behavior through the use of disciplinary measures. This strategy does not appear to be working as evidenced by the fact that the Class Member has been issued eight additional Incident Reports since their placement in SHU.

The Senior Monitor recommends that this Class Member be transferred to a facility which can appropriately support this individual's mental health needs and commensurate with the Class Member's custody level, as outlined in Program Statement 5310.016 CN-1 Treatment and Care of Inmates with Mental Illness. BOP advises that placement in the Administrative Unit for this Class Member was determined through consultation with staff and the PDS Branch, Designation and Sentence Computation Center, Correctional Programs Division, and with FMC Carswell's treatment and executive team.

### **Evaluation of Issues:**

- Four out of the thirteen Class Members, noted in this section, are transgender. This equates to 31% of the Class Members who claimed sexual or physical abuse. This is a high percentage and could indicate the potential vulnerability of transgender Class Members.
- Two of the three Class Members who claimed physical abuse were housed in the SHU.
- Facility services were offered and the local Rape Crisis Center telephone number were provided to Class Members during all of the SAIV contacts that occurred after a complaint of sexual abuse was made to staff in Psychology Services.
- Class Member case involving log #2025-169-P was not addressed, by mental health services, through a sexual abuse intervention.

### **Recommendation:**

- Provide medical and mental health follow-up services to Class Members who report physical abuse and as required by Program Statement 5324.12 CN-1 Sexually Abusive Behavior Prevention and Intervention Program, February 18, 2025.

## C. Staff Abuse & Retaliation

### 3. Reports of Staff Abuse or Sexual Abuse

66. The Monitor shall also review and include in quarterly reports the status of PREA reports made by Class Members regarding abuse that took place at FCI Dublin.

#### Metrics:

- OIG Extract/Any Allegation/All Dublin Investigations Report, September 11, 2025
- BOP Report of New Cases (33) Referred to the Office of Internal Affairs (OIA)/Office of the Inspector General (OIG) between July 1, 2025 and September 11, 2025
- Summary of Program Statements and Reference Documents, July – September 2025, Attachment

**Assessment:** Fifteen new sexual abuse cases were referred to the OIA and OIG between July 1, 2025, and September 11, 2025, pursuant to BOP’s report.<sup>7</sup> Of the 38 open cases, 14 were closed during this quarter. The report supplied by the OIA for this quarter no longer includes the investigation’s conclusions, nor whether the case was sustained or not sustained.

Status of New Sexual Abuse Cases Referred to the OIA/OIG This Quarter		Status of Sexual Abuse Cases by Year	
Ongoing Investigation	2	2022	12 Remain Open, 3 were closed
Designated to the Local Authority	7	2023	37 Cases Remain Open, 7 were Closed
Pending Deferral by the OIG	5	2024	421 Cases Remain Open, 24 were Closed
Pending Case Closure	1	2025	38 were Closed

#### Evaluation of Issues:

- OIA, in collaboration with local facility investigators, process and close investigations in a shorter time frame than the OIG. Additionally, when a case is referred to the OIG, BOP must then wait until the OIG defers the case to OIA for investigation. This can result in significant time delays for the investigation to be completed.
- An understanding was reached between BOP, Class Counsel and the Senior Monitor that all Class Member allegations, that do not rise to the level of criminal misconduct, will be forwarded to the OIA directly, instead of the OIG. This process will provide OIA with the opportunity to initiate an investigation, where warranted and without delay. OIA subsequently forwards a copy to the OIG as well.
- BOP is considering modifications to its staff investigation and disciplinary process that may improve the timeliness of investigations.
- Moving forward and on a quarterly basis, the Senior Monitor will include the status of each Class Member’s PREA case in a confidential attachment based on information provided by BOP.

<sup>7</sup> The next quarterly report (October – December 2025) will include an update that will include information from September 12<sup>th</sup> through the end of December 2025.

## **Recommendations:**

- Augment the current database, to include the case outcome and the date the Class Member was notified of the disposition.
- Investigations that are complete should be forwarded to the Senior Monitor for review.
- Cases should be completed promptly to avoid witness memories from fading, and to bring closure to and instill Class Member confidence in the process.
- Dispositions should be included in all future OIA/OIG Investigation Reports.

## C. Staff Abuse & Retaliation

### 3. Reports of Staff Physical or Sexual Abuse

**67.** The Monitor shall also review and include in quarterly reports reported injuries and mistreatment suffered by Class Members during transport between BOP facilities, including the status of investigation into transport issues.

#### Metrics:

- OIG Extract/Any Allegation/All Dublin Investigations Report, September 11, 2025
- Listing of Class Counsel Memoranda Containing 22 Pre-Consent Decree and 5 Post-Consent Decree Memorandums
- Program Statements and Reference Documents, July – September 2025, Attachment

**Assessment:** An updated OIG/OIA Investigations Quarterly Report was provided by BOP. This report included all allegations made by former FCI Dublin Class Members through September 11, 2025.

**NOTE:** It should be noted that on September 30, 2025, BOP reported that an updated OIA Transportation Investigation Report was in the final stages of being completed. All Class Member and staff interviews have been completed. Once the report is complete, it will undergo BOP's internal review and approval process. BOP did not provide a projected completion date for this review.

#### Evaluation of Issues:

- To locate Class Members who allegedly suffered injuries and mistreatment during transport from FCI Dublin, the Monitoring Team reviewed 22 pre-Consent Decree and 5 post-Consent Decree Class Counsel Memoranda which captured all Class Member complainant names. This list was cross checked with the latest OIG Extract/Any Allegation/All Dublin Investigations Report provided by BOP. Forty-seven (47) Class Member complainant names were provided to the Monitoring Team via Class Counsel memoranda that were not on the OIG Extract/Any Allegation/All Dublin Investigations Report.<sup>8</sup>

**NOTE:** The Senior Monitor was advised that an agreement was reached between Class Counsel and OIA that due to similar complaints that allegedly took place during the same transport from FCI Dublin, not all Class Members would be interviewed. If the complaints were the same, and OIA and Class Counsel felt they had an accurate representation of the complaints, not all Class Members would be interviewed.

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<sup>8</sup> The 47 Class Member's names can be found in the attachment titled, *Class Member Confidential Key, Paragraph 67.*

## **Recommendations:**

- BOP should include the 47 additional Class Member names found in the Class Counsel Memoranda in their Investigation Report.
- Class Member complaints, where appropriate, should be documented, reviewed, and investigated timely and thoroughly.
- Dispositions should be included in all future OIA/OIG Investigation Reports.
- Completed OIA/OIG cases, related to Transportation Investigative Reports, should be forwarded to the Senior Monitor for review when complete.

## D. Designation & Release

### 1. Designations

**68.** The Monitor shall review and report on Class Member designations. Monthly reports will include information about where Class Members are designated, and quarterly reports will include whether Class Members are designated to facilities with adequate programming, and educational and vocational opportunities.

#### Metrics:

- Class Member Email Complaints
- BOP Program Roster
- Class Counsel Memorandums, July 2, 2025, August 12, 2025, August 15, 2025 and September 30, 2025
- Paragraph 68, Programming, Educational and Vocational Opportunities - BOP Report (included in attachment titled, *Confidential Quarterly Monitoring Report, July 1 – September 30, 2025*)
- Program Statements and Reference Documents, July – September 2025, Attachment

**Assessment:** During this monitoring period, BOP provided a roster outlining all programming, educational, and vocation opportunities available at each facility that houses Class Members.

The wait times provided in the report lack clarity as to whether they reflect the experiences of Class Members specifically or the facility's general population. This distinction is significant, as Class Members may face different circumstances in accessing programming. Without this specificity, the data cannot be relied upon to accurately assess how long a Class Member may wait to enter a program. Consequently, the absence of clear, disaggregated information limits the Monitoring Team's ability to evaluate Class Members' access to adequate programming opportunities. The Senior Monitor requested that BOP provide information specific to Class Members; however, BOP indicated that compiling this data would be too burdensome.

**FCI/FPC Aliceville:** FCI/FPC Aliceville, located in Alabama, is a care-level 2 facility, housing 1,500 low-security female adults in custody, of which 28 are Class Members. This facility's Education Program offers General Educational Development (GED), English as a Second Language (ESL), Adult Continuing Education (ACE), Sign Language (SLN), The Barton Reading System, Academic Success and multiple other courses. The Vocation Program offers ACE, Carpentry, Electrician, Plumber, Heating, Ventilation, and Air Conditioning (HVAC), and Welding. In addition, Cosmetology, Commercial Driver's License, SERVSAFE Food Handler, and Culinary Arts are offered, in addition to other programming opportunities.

The Education Program waitlists range from no wait to six months. The Vocation Programs offered have an approximate wait time of up to 12 months. The Psychology Program waitlists vary from 3 to 24 months for some classes and 3 months for others.

FCI/FPC Aliceville reported there were no class cancellations in July, three in August and one in September. All cancellations were as a result of the closure of the compound by Operations.

**FPC Bryan:** FPC Bryan, located in Texas, is a minimum-security camp housing approximately 660 Female Adults in Custody (AIC), of which 9 are Class Members. This facility offers ACE classes, GED, and Academic Success. The Vocation Program includes Certified Nursing Assistant (CNA) classes, Cosmetology, and HVAC. The Psychology Program offers both a Residential Drug Abuse Program (RDAP) and a Non-RDAP (NRDAP), Resolve and Spanish Resolve Trauma Programs, and five other therapeutic courses.

This facility offers a great variety of additional programming opportunities. Examples include the Dog Program, Forklift Certification, Occupational Safety and Health Administration (OSHA) classes and Parenting classes. Also offered is a UNICOR<sup>9</sup> service type factory designated as a call center, which employs approximately 140 AICs.

Education waitlists range from no waitlist to 12 months. GED has a wait list of five months with one former FCI Dublin Class Member enrolled. The Class Member's specific information was provided for this class only.

Vocation Program waitlists range from 5 weeks for the ACE courses to 12 months for the CNA course. Psychology Program waitlists range from no waitlist to 12 months.

FPC Bryan reported no cancelled classes during this quarter.

**FMC Carswell:** FMC Carswell, located in Texas, has a population of 1,147, of which 55 are Class Members. The facility is a minimum-security satellite Camp for minimum female AICs. There is also low and high security housing for those not eligible for minimum placement. The Education Program offers GED both in English and Spanish, ESL, The Barton Reading Program, ACE, and Academic Success classes. The Vocation Program offers Cosmetology, Culinary Arts, SERVSAFE Manager, and Apprenticeship Programs. The Psychology Program offers Female Integrated Treatment (FIT) both in English and Spanish, Sex Offender Treatment Program, Dual Diagnosis Residential Drug Program, and Seeking Safety. There are 17 therapeutic courses offered by the Psychology Program at this facility.

The Education Program has a waitlist period of no wait to six months. Vocation waitlists range from no wait to 3 months. Psychology Program waitlists range from no wait time to 12 months.

FMC Carswell had several cancellations due to the holidays and facilitators for classes not being available.

**FSL Danbury:** FSL Danbury, located in Connecticut, includes a satellite Federal Prison Camp designated to house minimum custody level female AICs in dormitory housing. Additionally, FSL Danbury (the actual facility, houses low security female AICs. Between the 2 facilities there are 27 Class Members. FSL Danbury offers GED and ESL. It does not offer Adult Education classes. There is also only one vocation program. In the Psychology Program, the FIT program is offered along with NRDAP and seven additional

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<sup>9</sup> UNICOR is a prison labor program within the BOP.

programs. The Education waitlist ranges from 0 to 3 months. There is no vocation waitlist for the Culinary Food Services Line. The Psychology Program waitlist is 0 to 3 months.

FSL Danbury offers minimal programs for the inmate population, making it less than adequate for Class Members housed at this location.

The information provided by BOP<sup>10</sup> shows minimal cancellations of programs during this reporting period.

**FPC Greenville:** FPC Greenville, located in Illinois, houses 220 minimum-custody AICs, of which 3 are Class Members. This facility offers GED, ESL, ACE, and multiple other education classes. Vocation programs are limited, with only a Custodial Certification Program offered. The Psychology Programs consist of FIT, NRDAP, Drug Education and other classes, to include Emotional Self-Regulation, Seeking Safety, Anger Management, and Trauma in Life. FPC Greenville offers other additional programming opportunities, to include Doula training, College Megatronics, and college-level courses.

The waitlist time for Education classes is 0 to 3 months. The vocation class has a 3-to-6-month waitlist. The Psychology Programs all have a 0-to-3-month waitlist.

FPC Greenville reported there were no cancellations of classes during this reporting period.

**SFF Hazelton:** SFF Hazelton, located in West Virginia, houses approximately 450 low-security female AICs, of which 7 are Class Members. The facility offers GED, ESL, ACE and Academic Success classes. There is also a Barista and SERVSAFE class offered. There are two vocation programs offered, culinary arts and horticulture. There are 16 additional programming opportunities offered. The Psychology Program has a FIT Unit and offers seven other self-help courses.

The Education courses have a waitlist time of less than two months. The Vocation courses have a one-year wait time as the courses take one year to complete. The Psychology courses did not provide waitlist times, but rather, the number of AICs on waitlists for each course. These numbers range from 98 to 267.

All classes and programs were cancelled from August 6 – 22, 2025, as a result of modified operations.

**FPC Lexington:** FPC Lexington, located in Kentucky, is a female satellite Federal Prison Camp housing approximately 254 low/minimum security female AICs of which 10 are Class Members. This facility offers GED, Spanish GED, ESL, ACE and First Step Act (FSA) courses. Vocation Programs consist of Carpentry, Electrical, SERVSAFE and multiple apprenticeships. The Psychology Program offers the Resolve Trauma Program, NRDAP, Parenting and 12 additional therapeutic courses. Additional programming opportunities are also offered.

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<sup>10</sup> Attachment titled, *Confidential Quarterly Monitoring Report, July 1 – September 30, 2025, D. Designation & Release, 1. Designations, Paragraph 68, Programming, Educational and Vocation Opportunities, BOP Report.*

Education waitlist times are non-existent. The Vocation Program's waitlists depend upon interest in the courses. The Psychology programs provided the number of female AICs on their waitlists, not the length of time. The numbers range from 19 to 254.

There were no class cancellations during this reporting period.

**FPC Pekin:** FPC Pekin, located in Illinois, is a Federal Prison Camp for minimum security level female AICs, of which 12 are Class Members. The Education Program offers GED, ESL, ACE, and college courses. Vocation opportunities consist of Federal Prison Industries, Occupational Certificates, and Apprenticeships. The Psychology Program offers 19 courses. There were no additional programming opportunities listed for this facility.

There are no waitlists for the Education Programs, with the exception of the Illinois Center College Programs which have a 6-month waitlist. Vocation Programs have waitlists from 6 months to 2 years. Psychology Programs offered all have 6 to 12 month waiting lists.

There were no class cancellations during this reporting period.

**FPC Phoenix:** FPC Phoenix, located 10 miles north of the Phoenix city limits, is a minimum-security facility for female AICs. It houses approximately 256 females, of which 14 are Class Members. The facility offers GED, ESL, ACE and other education courses. There are four vocation courses offered. The Psychology Program offers 21 classes inclusive of RDAP, Resolve Trauma Program, and Parenting. There are also additional programming opportunities, to include a dog program.

The waitlists for the Education Program are zero, with the exception of GED with a four-week waitlist. Vocation Programs can take up to three months before an AIC/Class Member is accepted into the program. The Psychology Program waitlists range from three to six months.

In terms of class cancellations, GED and ESL were cancelled four times each during the reporting period due to augmentation. ACE and other classes were cancelled six times each for a variety of reasons. One reason was the lack of space. The Monitoring Team has not toured this facility, but has been informed by BOP that space is indeed an issue, and to provide more space for classes, modular buildings have been ordered and since been delivered.

**FCI Tallahassee:** FCI Tallahassee, located in Florida, houses approximately 1,142 low security female AICs of which 26 are Class Members. The facility offers GED, ESL, ACE and multiple other education classes. Vocation courses offered are Custodial Maintenance and Barista/Culinary Arts. The Psychology Program offers FIT, Resolve Trauma Program, NRDAP, and multiple other therapeutic courses. The waitlists for Education for this reporting period range from no wait to 6 months. This is a marked improvement from the last reporting period. Wait times for Vocation Programs range from 2 to 3 months. Psychology Programs are offered based on the release and waitlist date of Class Members/AICs.

FCI Tallahassee had no class cancellations during this reporting period. This is also an improvement from last quarter.

**FPC Victorville:** FPC Victorville, located in California, includes a Satellite Prison Camp housing approximately 256 minimum security female AICs, of which 23 are Class Members. The facility offers GED, ESL, and ACE courses. It also includes college courses, to include courses from Victorville Valley College and the University of California, Los Angeles. Vocation courses offered are Small Appliance, Culinary Arts, Solar Installation, Automotive Apprenticeship, and SERVSAFE. The Psychology Program offers courses such as Trauma, Seeking Safety, Resolve, and Anger Management. There are multiple additional programming opportunities offered.

The waitlist times for Education Programs varied from 30 to 90 days. Vocation waitlists were up to one year. Psychology Program course waitlists ranged from 3 to 6 months.

For this reporting period there were two class cancellations.

**FCI Waseca:** FCI Waseca, located in Minnesota, houses approximately 856 low security female AICs, of which 42 are Class Members. This facility provides GED, ESL, ACE, Academic Success and Barton Reading and Spelling. A multitude of vocation programs are offered, making it the most robust of all the facilities housing Class Members. Vocation courses offered are Automotive Technician, Electric, HVAC, Pipefitter, Landscape, Teacher's Aid, and Housekeeping apprenticeships, Stationary Engineer, Horticulture, Cosmetology, Personal Trainer, CNA, Doula training, PAWS/Animal Trainer, and Greenhouse Specialist. The Psychology Program offers RDAP and NRDAP, and 15 other therapeutic classes. There are also additional programming opportunities offered.

The waitlists for education classes range from none for GED, ESL, ACE and the Barton course, and up to 12 months for other classes. Vocation course waitlists can range from no wait time to two years. The Psychology Program waitlist ranges from 10 weeks to 12 months.

Cancellation information for this quarter and provided by BOP lists two UNICOR ACE classes, Peer Support Specialist, and SERVSAFE. Anger management, Critical thinking and Basic Cognitive Skills were all closed for only one day.

### **Evaluation of Issues:**

- BOP did not provide specific data related to Class Members and as such, a more thorough and complete analysis could not be included in this report.

### **Recommendation:**

- BOP should provide the Monitoring Team with data specific to Class Members in the roster compiled by the facilities. This will enable the Monitoring Team to assess whether Class Members are being provided adequate programming opportunities.

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**Wendy Still, MAS, Senior Monitor**

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California Coalition for Women Prisoners, et al., v. U.S. Federal Bureau of Prisons, et al., Consent Decree

Case No. 4:23-cv-04155-YGR

2<sup>nd</sup> Quarterly Status Report, July 1 – September 30, 2025

## D. Designation & Release

### 4. Compassionate Release Requests

77. The Monitor shall review and report on all compassionate release requests submitted by Class Members. Reports will be quarterly and include an update on the status of the request.

#### Metrics:

- Inmate Request for Compassionate Release/RIS Consideration Form
- Paragraph 77, Reduction in Sentence Requests Alleging Sexual Abuse, September 2025, Attachment
- Summary of Program Statements and Reference Documents, July – September 2025, Attachment

**Assessment:** The following table reflects resolved requests for reductions in sentence (RIS) cases as of September 2025. This information was provided by BOP.

Reduction in Sentence Requests Status Resolved Case List	
Released Between April 1, 2024 and September 2025	6
No Motion Filed	3
RIS Denied by the Office of General Counsel	27
RIS Denied by FCI Danbury	1
RIS Denied by FCI Hazelton	1

BOP provided the above information related to RIS requests filed by Class Members. Since April 1, 2024, six Class Members have been released, of which one was released via executive clemency. Two RIS requests were denied at the facility level, and 27 have been denied by the Office of General Counsel.

**Evaluation of Issues:** N/A

**Recommendation:** N/A

## E. Member Access to Counsel & the Monitor

**83.** The Monitor will review, and include in quarterly reports, complaints from Class Members regarding confidential communication with the Monitor or Class Counsel and may provide recommendations for improved confidential communication.

### Metrics:

- Class Member Email Complaints
- Emails from BOP Liaison
- Quarterly Access to Counsel Report
- Class Counsel Memorandums, July 2, 2025, August 12, 2025, August 15, 2025 and September 30, 2025
- Program Statements and Reference Documents, July – September 2025, Attachment

**Assessment:** During this reporting period, there were numerous incidents of Class Members unable to access Class Counsel. These incidents were reported to the BOP Liaison either via email or Class Counsel Memorandums. These complaints indicate ongoing concerns about the adequacy and reliability of confidential communication channels. The volume of complaints suggests that existing safeguards may not be uniformly implemented across facilities or sufficiently understood by staff and Class Members. While some issues appear procedural in nature, others point to the need for improved staff training, clearer guidance, and enhanced oversight to ensure access is timely and protected as required.

The following is a synopsis of complaints received:

- A Class Member refused to exit the legal call area. This resulted in three other Class Members not being able to access the area to make legal calls.
- Multiple Class Members at FMC Carswell reported they were unable to make legal calls during the call block times because staff were unavailable. The Senior Monitor asked the BOP Liaison to review this allegation and provide feedback. In response, the facility reported to the BOP Liaison that there was no interruption to legal calls.
- Class Member made three attempts to contact Class Counsel via telephone; however, there was no answer. Class Counsel acknowledged they missed the calls.
- Class Member notified the Senior Monitor she was unable to make a legal call while housed in SHU. The Senior Monitor notified the BOP Liaison and was informed the Class Member was unaware of the procedure to ask for a legal call while housed in SHU. This incident was also reported in the September 2025 monthly monitoring report. It should not have been the sole responsibility of the Class Member to be aware of procedure. If a Class Member housed in SHU asks for a legal call, BOP staff should inform the Class Member of the process for accessing legal calls.

**Complaints Related to Access to Class Counsel & the Senior Monitor:** Memorandums from Class Counsel (dated July 2, August 12, August 15, and September 30), which were also submitted to BOP, contained complaints relative to access to Class Counsel and the Senior Monitor. These complaints are summarized as follows:

**Class Counsel Memorandum, July 2, 2025:**

Class Counsel received reports of disruptions to the legal call blocks across multiple facilities. For example, Class Members report that legal call blocks at FCI Waseca were disrupted for several weeks because the blocks fell on “*lock down*” days, where the entire facility had been locked down due to understaffing. The Senior Monitor did not receive legal call access complaints at FCI Waseca during July 2025.

Class Counsel and the Senior Monitor received a report that the area being used for legal call blocks at FCI Tallahassee is a building (G Unit) that was previously deemed unsafe for use because of asbestos and mold. One Class Member reported she did not want to use the legal call block because she did not want to enter that building. The Senior Monitor asked to view this area and the legal call block room during the onsite monitoring touring of the facility. The Senior Monitor viewed the area and found no issues with the legal call room.

Class Counsel continues to receive reports from across facilities where Class Members are housed that staff have opened legal mail outside the presence of Class Members. The Senior Monitor has not received any email complaints relative to this issue.

**Class Member 1:** Reported she is required to sign a refusal for every legal call block period where she does not wish to speak with Class Counsel. The Senior Monitor did not receive a direct complaint from the Class Member; however, BOP policy and the Consent Decree does not require Class Members to sign a refusal form when choosing not to participate in a legal call. BOP can choose to document the refusal for their records and as a proof of practice, but should not require the Class Member to sign a refusal form.

**Class Counsel Memorandum August 12, 2025:**

Class Members at FPC Victorville reported they are unable to contact BOP’s OIA via TRULINCS. The Senior Monitor did not receive any complaints directly from Class Members during August 2025 relative to this issue. Additionally, at least four Class Members at FMC Carswell reported they missed at least one legal call block due to staffing issues at the facility. The Senior Monitor also received similar complaints from Class Members in August 2025.

**Class Members 2, 3 and 4:** Class Members were placed in a jail without notification to Class Counsel. While at the jail, Class Member 2 frequently requested to speak to Class Counsel and the Senior Monitor, but was reportedly told there was no way to do so from the jail. She reportedly had to purchase basic necessities from the commissary while at the jail. Days later, she again purchased the items after her

return transfer to the BOP facility. The Senior Monitor followed up on these concerns with the BOP Liaison advising the privileges granted in the Consent Decree do not pertain to Class Members when they are temporarily placed in custody outside of BOP's jurisdiction. Placement in a county jail prevents Class Members from accessing legal call privileges as outlined in the Consent Decree Paragraph 81.

#### **Class Counsel Memorandum August 15, 2025:**

**Class Member 5:** Reported she has repeatedly received delayed legal mail, and recently received legal mail dated three weeks prior. This has affected her communication with her daughter related to home confinement and with the court as it relates to her bankruptcy proceedings. Class Member also shared that because she currently does not have access to computer messages or telephone calls, she is limited to using mail to communicate. However, she reported the commissary is not regularly stocked with postage stamps. This is limiting her access to legal counsel and her family. The Senior Monitor did not receive a direct complaint from this Class Member. She is no longer in custody.

**Class Member 6:** Reported she had been waiting since February 2025 to have her contacts reviewed and approved. She indicated she contacted a Special Investigative Agent, but was not provided answers.

#### **Class Counsel Memorandum September 30, 2025:**

During the second week of August 2025, Class Members at reported being on lockdown for the weeks prior to the call block schedule. They conveyed issues regarding the lockdown and lack of access to Class Counsel, the Senior Monitor and legal mail.

**Class Member 7:** Reported BOP cut off communication with her family, including calls and emails. She opined she is *"too much of a problem"* and as such, BOP would prefer *"to get rid of her."*

**Class Member 8:** Reported issues with legal paperwork during the facility's lockdown in August 2025. Her mother passed away and as such, she requires access to time sensitive documents for probate, but was not receiving access to the documents. She reported the legal mail issues to staff, but the issues were not addressed. She reported she could not access the telephone to make calls during this time in order in order address issues related to probate.

**Class Member 9:** Reported issues with the lockdown at the facility and was reportedly denied access to the Monitoring Team after repeatedly requesting to speak with the Senior Monitor. She further reported not having access to tablets, and unequal treatment with some individuals where Officers granted more privileges to those they favored while others were locked down. Class Member alleged the Officers called Class Members *"late"* to speak with Class Counsel during the scheduled legal call block times. As a result, not all Class Members were provided access to Class Counsel. During this reporting period, the Senior Monitor did not receive complaints from this Class Member pertaining to these issues.

**Class Member 10:** Reported issues with legal mail being opened in front of staff who then determined it was not legal mail. The Senior Monitor followed up on this complaint and although the envelope was

clearly marked legal mail and had the legal firm's name on the cover, it did not identify the individual whose name was on the outside of the envelope as an attorney.

**Class Member 11:** Reported not being permitted to contact Class Counsel using the facility's legal call block as of September 10th. Class Member's counselor reportedly does not work Wednesdays, and as such, Class Members in the Counselor's Unit were not able to contact Class Counsel.

### **Evaluation of Issues:**

- The number of complaints received in this quarter is concerning. The receipt of numerous complaints regarding access demonstrates that, while mechanisms exist for access to Class Counsel and the Senior Monitor, they are not functioning consistently or effectively across all facilities housing Class Members. The complaints reflect gaps in implementation, staff awareness, and oversight rather than isolated incidents. These deficiencies undermine Class Members' confidence in accessing communications with Class Counsel and the Senior Monitor.

### **Recommendation:**

- Without corrective action, the persistence of these issues is likely to result in continued complaints and the potential erosion of trust in the monitoring process. Overall, the issue warrants continued monitoring and focused remedial measures to ensure confidential communications are reliably protected and accessible.

## F. Processing of Damages related to Closure due to Property Loss

**84.** The Monitor shall also review and report on loss and damage to Class member property as a result of transfer from FCI Dublin, including the status of Class Members' claims for compensation. Nothing in this section shall prejudice the right of the Class Members to make unreleased claims within the normal one-year time frame from the incident.

### Metrics:

- Class Member Email Complaints
- Quarterly Property Roster
- F. Processing of Damages Related to Closure due to Property Loss, Paragraph 84 (included in attachment titled, *Confidential Quarterly Monitoring Report, July 1 – September 30, 2025*)
- Program Statements and Reference Documents, July – September 2025, Attachment

**Assessment:** From March 15, 2024 through the closure of FCI Dublin, Class Members were notified of their transfers with minimal notice—sometimes as little as a few hours—and instructed to pack their belongings into a single green duffel bag. Items that could not fit were packed in one box and mailed to the Class Member's residence addresses at BOP expense.

**NOTE:** The Consent Decree did not take effect until March 31, 2025.

Following the facility's closure and the subsequent transfer of all Class Members to locations across the country, numerous individuals reported the loss of personal property, to include boxes that were packed, but not mailed to the Class Members' residences.

Class Members have encountered substantial barriers in submitting property claims and appeals for reconsideration. Many claims were lost and had to be resubmitted, while others did not receive a timely response, and in some cases, no response at all. The documentation provided by BOP to Class Members, when a claim was denied, was confusing. Many Class Members did not understand that they had the right to file for reconsideration. The bulletin that was posted in TRULINCS on April 23, 2024, was posted for one month, rather than the intended year, leaving many Class Members with a lack of procedural information.

BOP did not learn about this issue until April 25, 2025. The bulletin noted May 1, 2025 as the final date to file a claim. When BOP learned of the one month posting issue, the deadline was extended to May 16, 2025, rather than May 1st, still leaving little time for Class Members to file a claim. When this issue was raised to the BOP by Class Counsel and the Senior Monitor, a decision was made by BOP to extend the deadline to June 15, 2025.

Class Members report BOP has frequently denied or rejected their claims or offered disproportionately low compensation in comparison to the Class Members' reported value of the property lost. The Senior Monitor and Class Counsel have worked collaboratively with BOP staff to facilitate the processing of

property claims. To accommodate Class Members who were unable to provide receipts to substantiate the value of their lost property, the Consent Decree offered an alternative option for reconsideration, allowing individuals to submit a signed affidavit in lieu of receipts. After the bulletin was reposted in TRULINCS, many Class Members refiled for reconsideration. This is reflected in the attachment titled, *F. Processing of Damages Related to Closure due to Property Loss, Paragraph 84* -- included in attachment *Confidential Quarterly Monitoring Report, July 1 – September 30, 2025*)

The two significant consequences of the property claim process were highlighted in the previous quarterly monitoring report (March 31 – June 30, 2025). Neither were communicated to Class Members prior to the submission of their claims. Rather, BOP responded stating, *“neither of these ‘significant consequences’ were required to be conveyed per the plain terms of the Consent Decree.”* BOP also placed the onus on the Senior Monitor by stating, *“BOP recalls property claims were subject to monitoring long before the Consent Decree took effect.”*

The first significant consequence is the maximum allowable reimbursement for any individual claim was limited to \$1,000 per 31 U.S.C. Section 3723. The second significant consequence of the property claim process was that any approved claim payments could be subject to offset by the U.S. Department of the Treasury to satisfy outstanding debts owed by the Class Member. These offsets could include, but were not limited to, obligations such as unpaid child support, taxes, or overpayments of public assistance benefits.

The BOP may or may not receive notification from the U.S. Department of the Treasury when a payment has been diverted to satisfy an offset. In instances where notification is received, it does not include information specifying the nature of the offset. The Treasury Offset Program (TOP) is required to send a notice to the taxpayer and will not offset the debt if a notice is not provided. However, there is no requirement for the TOP to determine if the notice is actually received. As a result, the Class Member may not be notified, yet the responsibility falls to the Class Member to investigate the reason for the offset. However, to date, no reliable contact information for the TOP has been made available to Class Members.

BOP’s contention is that the Consent Decree does not require BOP to provide information pertaining to the maximum allowable reimbursement or offsets. They state the reimbursement information can be found in the Law Library where they can learn the cap of \$1,000. Granted, it may be found at the Law Library; however, providing this information in the bulletin could have eliminated wasted time and effort, by both BOP staff and Class Members, and the *“back and forth”* associated with processing the paperwork.

Additionally, BOP’s data reflects a claim as *“PAID”* even in instances where the payment was redirected to satisfy a Treasury offset, rather than disbursed directly to the Class Member. As a result, there is no mechanism within BOP to distinguish between claims that are paid to the individual and those applied towards an offset, creating confusion and lack of clarity regarding the final disposition of the claim. The more recent rosters provided by BOP have added *“offset”* next to PAID to assist in distinguishing between the two. However, if BOP does not receive notification of the offset, it cannot be added. The Senior

Monitor continues to work towards identifying and providing a viable point of contact to assist Class Members in obtaining information related to offset actions.

To date, there are 287 documented property claims (see attachment within the Confidential Quarterly Monitoring Report, July 1 – September 30, 2025, titled *F. Processing of Damages Related to Closure due to Property Loss, Paragraph 84*) that have been formally submitted to the BOP. Partial data has been updated to reflect if claims were offset. There are 19 property claims still open because Class Member signatures have not been obtained.

Additionally, Class Counsel memorandums continually raise concerns regarding property. The Senior Monitor will continue to review and report on the processing of Class Member property claims through to their final resolution, including the completion of all required documentation by the BOP.

### **Evaluation of Issues:**

- Property claims remain an outstanding issue between Class Members and BOP. The disparity in refunds has not been explained by BOP. The Senior Monitor has asked for copies of BOP documentation related to their calculation of Class Member property settlement claims, However, to date, BOP has denied this request citing that this documentation is considered legal work product and as such, privileged information that is not accessible to the Senior Monitor.

### **Recommendations:**

- BOP should consider re-reviewing property claims filed by Class Members; in particular, those with the greatest disparity in reimbursement offers compared to the value of the property lost as indicated by the Class Member. BOP opines they do not have the legal authority to re-review a claim once it is settled. The Senior Monitor continues to have concerns regarding perceived disparity in the claims that have been settled.
- BOP should provide the Senior Monitor with information limited to the property settlement calculation of each request in order to address concerns related to the perceived disparity of settlement amounts.

## Signature

Submitted to: (1) United States District Court, Northern District of California, Oakland Division, (2) U.S. Federal Bureau of Prisons Counsel & (3) Class Counsel.



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Wendy Still, MAS  
Senior Monitor

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December 30, 2025

Date

## Glossary of Acronyms

ACE	Adult Continuing Education
ADO	Administrative Detention Order
AICs	Adults in Custody
BOP	Bureau of Prisons
BEMR	Bureau Electronic Medical Record
C.F.R.	Code of Federal Regulations
CNA	Certified Nursing Assistant
DHO	Disciplinary Hearing Officer
ESL	English as a Second Language
FDC	Federal Detention Center
FCI	Federal Correctional Institution
FIT	Female Integrated Treatment
FMC	Federal Medical Facility
FSA	First Step Act
FTC	Federal Time Credit
GED	General Educational Development
NRDAP	Non-Residential Drug Abuse Program
OIA	Office of Internal Affairs
OIG	Office of Inspector General
PREA	Prison Rape Elimination Act
RCC	Rape Crisis Center
RDAP	Residential Drug Abuse Program
PDS	Psychology Data System
RIS	Reduction in Sentence
SCA	Second Chance Act
SHU	Special Housing Unit
SLN	Sign Language
TRULINCS	Trust Fund Limited Inmate Computer System
UDC	Unit Discipline Committee
HVAC	Heating, Ventilation and Air Conditioning

## Definitions

The following definitions apply to the terms of the Consent Decree.

**Adult in Custody (AIC)** refers to any person in BOP custody who is designated at a penal or correctional institution, or in a halfway house, contract facility, or in limited cases, on supervision on home confinement, or designated to some other setting outside a BOP penal or correctional facility. BOP states that it is not responsible for care for persons held in a halfway house, contract facility, or, in limited cases, on supervision on home confinement, or designated to some other setting outside a BOP penal or correctional facility.

**Administrative Detention** refers to an administrative status which removes an AIC from the general population. Administrative detention status is non-punitive, and can occur for a variety of reasons. 28 C.F.R. § 541.22(a).<sup>11</sup>

**Administrative Detention Facility** for the purposes of this agreement refers to BOP institutions that house people in pretrial detention, including Metropolitan Correctional Centers (MCCs), Metropolitan Detention Centers (MDCs), and Federal Detention Centers (FDCs).

**Alert[s]** refers to instances where Senior Monitor, identified a concern arising from a Class Member's treatment or lack thereof at FCI Dublin or during transfer from FCI Dublin, including concerns related to: medical and/or mental healthcare (including Medication Assisted Treatment and Medical and/or Mental Health Nexus Cases, as defined below), PREA reports and advocacy services, compassionate release requests, release dates and application of Federal Time Credits, disciplinary incidents and impacts on security and recidivism classifications (including Good Credit Time, Forfeited Non-Vested Good Time Credit, Administrative Detention Time and Disciplinary Segregation Time), property claims, and transport issues. The Senior Monitor's decision to clear or place an Alert shall be final subject to reconsideration by the Senior Monitor at the Senior Monitor's discretion. Alerts closed prior to the Effective Date may be reopened if the AIC provides proof that the Senior Monitor deems sufficient that the alert should not have been closed. Such requests shall be submitted to the Senior Monitor no later than December 1, 2024, unless the AIC shows by clear and convincing evidence that the evidence submitted in support of reopening could not have been submitted before December 1, 2024. This paragraph does not limit the ability of the Senior Monitor to reopen an alert closed prior to the Effective Date if the Senior Monitor determines, based on sufficient proof, that the alert should not have been closed.

**BOP Counsel** means both BOP in-house counsel and litigation counsel assigned by the Department of Justice. In the event that any individual BOP Counsel separates from his or her employment or if the case is reassigned to different counsel, BOP Counsel will designate successor counsel and notify the Senior Monitor and Class Counsel of the change.

**BOP Liaison** means an employee from BOP's Central Office who is a direct report to the BOP's Deputy Director who is designated to and whose sole duties are to facilitate BOP's compliance with the terms of

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<sup>11</sup> [eCFR :: 28 CFR 541.22 -- Status when placed in the SHU.](#)

this Consent Decree. The BOP Liaison will have access to BOP subject matter experts at the regional and Central Office level, and should assist the Senior Monitor to gather information, help track alerts, and if necessary, should raise concerns with the Deputy Director directly. The BOP Liaison will share only minimal information with other BOP employees, and will share such information only to the extent necessary to enable the BOP Liaison to access necessary records and other information. The BOP Liaison shall not share any information related to a Class Member complaint with any official who is the subject of that complaint. The BOP Liaison does not have independent authority to direct any BOP employee to take a particular action but should make recommendations after consulting with BOP's Deputy Director, subject matter expert, or the Senior Monitor.

**Class Member** refers to all people who were incarcerated at FCI Dublin between March 15, 2024 and May 1, 2024, and all named Plaintiffs.

**Class Counsel** refers to Arnold & Porter, California Collaborative for Immigrant Justice, Rights Behind Bars, Rosen Bien Galvan & Grunfeld including Ernest Galvan, Kara Janssen, Luma Khabbaz, Adrienne Spiegel, Susan Beaty, and Amaris Montes. In the event that any individual Class Counsel separates from his or her employment, Class Counsel will designate successor counsel and notify the Senior Monitor and BOP Counsel of the change.

**Code of Federal Regulations (C.F.R.)** The C.F.R. is the official legal print publication containing the codification of the general and permanent rules published in the Federal Register by the departments and agencies of the Federal Government.

**Complaint** refers to any notification to the Senior Monitor in any form by a Class Member or Plaintiffs' counsel.

**Consistent with Security** means subject to exceptions including, but not limited to, major disturbances that require staffing to be re-directed to other areas of the facility on an emergency and temporary basis or natural disasters, and similar other emergencies that restrict movement to preserve safety.

**Daylight Provision** means no attendant obligation shall be imposed upon the BOP other than the collection and provision of data.

**Designation or designated** refers to an order from the BOP's Designation and Sentence Computation Center indicating the facility of confinement for an AIC.

**Disciplinary Segregation** refers to a punitive status wherein an AIC is placed in SHU, only as a sanction imposed by a Discipline Hearing Officer (DHO) for committing a prohibited act(s). 28 C.F.R. § 541.22(b), 541.24.

**Effective Date** refers to the date on which this Consent Decree is approved by the Court.

**Federal Correctional Institution (FCI) Dublin** refers to both the low security Federal Correctional

Institution located in Dublin, California and the adjacent satellite Camp.

**Federal Detention Center (FDC)** refers to an administrative security federal detention center that houses pretrial detainees and sentenced inmates.

**Federal Medical Institution (FMC)** referrals to a Board of Prisons medical institution.

**First Step Act (FSA)** refers to the First Step Act (FSA) of 2018 (P.L.115- 391) and any subsequent amendments to the law.

**Federal Time Credit (FTC)** refers to time credits towards prerelease custody or early transfer to supervised relief, authorized by procedures for earning and application of time credits that are outlined within the FSA.

**Grievance** refers to any BOP cop-out, administrative remedy, or similar written form.

**Medical and/or Mental Health Nexus Case** refers to a medical or mental health issue that (i) was first raised, identified, or documented at FCI Dublin (whether by the Class Member themselves, BOP staff or contractors, the then-Special Master, and/or a member of her team, or the Court); or (ii) the Senior Monitor and/or a member of her team, based on a review of a more recently filed grievance or complaint or other communication, determines (ii) category, this definition is limited to Grievances or Complaints submitted to the Senior Monitor no later than December 1, 2024, unless the Senior Monitor determines there is clear and convincing evidence establishing that the grievance or complaint could not have been submitted by December 1, 2024. In making this determination, the Senior Monitor shall review any relevant information available to the Senior Monitor, including any information provided by the Class Member, BOP personnel or third-party contractors, Class Counsel or BOP Counsel.

**Protective Status** Protective Status refers to an administrative status where an AIC placed in SHU for their own protection. 28 C.F.R. § 541.23(c)(3). For any AIC who is placed in SHU as a protection case, whether requested by the AIC or staff, an investigation occurs to verify the reasons for placement. 28 C.F.R. § 541.28.

**Rape Crisis Centers** refers to community-based organizations that help survivors of rape, sexual abuse, and sexual violence who have an active Memorandum of Understanding (MOU) with BOP.

**Second Chance Act (SCA)** refers to the Second Chance Act of 2007 (P.L. 110-199) or any subsequent amendments to the law.

**Security Sensitive Information** refers to information whose disclosure without the benefit of a protective order would jeopardize the safety and security of any person, or would jeopardize an ongoing investigation of crime or misconduct.

**Senior Monitor (or Monitor)** refers to Wendy Still while serving under the order of May 20, 2024, ECF

No. 308 in the instant action, or any successor Monitor appointed in this action.

**Special Housing Unit(s) (SHU[s])** refers to housing units in BOP facilities where AICs are separated from the general population, and may be housed either alone or with another AIC. When placed in the SHU, an AIC is either in disciplinary segregation status or administrative detention status. 28 C.F.R. § 541.22.

**Special Master** refers to Wendy Still during the period between April 4, 2024, and May 20, 2024, when she served as the Special Master in the instant action.

**Third Party Care or Outside Provider Care** refers to medical, mental health, or dental care that the BOP provides to AICs using non-BOP employees.

**Term of the Consent Decree** runs two years from the Effective Date, unless terminated pursuant to § VIII.

## Relevant Federal Codes

### § 541.22 Status when placed in the SHU.

When placed in the SHU, you are either in administrative detention status or disciplinary segregation status.

- (a) Administrative detention status. Administrative detention status is an administrative status which removes you from the general population when necessary to ensure the safety, security, and orderly operation of correctional facilities, or protect the public. Administrative detention status is non-punitive, and can occur for a variety of reasons.
- (b) Disciplinary segregation status. Disciplinary segregation status is a punitive status imposed only by a Discipline Hearing Officer (DHO) as a sanction for committing a prohibited act(s).

### § 541.23 Administrative detention status.

You may be placed in administrative detention status for the following reasons:

- (a) Pending Classification or Reclassification. You are a new commitment pending classification or under review for Reclassification.
- (b) Holdover Status. You are in holdover status during transfer to a designated institution or other destination.
- (c) Removal from general population. Your presence in the general population poses a threat to life, property, self, staff, other inmates, the public, or to the security or orderly running of the institution and:
  - (1) Investigation. You are under investigation or awaiting a hearing for possibly violating a Bureau regulation or criminal law;
  - (2) Transfer. You are pending transfer to another institution or location;
  - (3) Protection cases. You requested, or staff determined you need, administrative detention status for your own protection; or
  - (4) Post-disciplinary detention. You are ending confinement in disciplinary segregation status, and your return to the general population would threaten the safety, security, and orderly operation of a correctional facility, or public safety.

#### **§ 541.24 Disciplinary segregation status.**

You may be placed in disciplinary segregation status only by the DHO as a disciplinary sanction.

#### **§ 541.25 Notice received when placed in the SHU.**

You will be notified of the reason(s) you are placed in the SHU as follows:

- (a) Administrative detention status. When placed in administrative detention status, you will receive a copy of the administrative detention order, ordinarily within 24 hours, detailing the reason(s) for your placement. However, when placed in administrative detention status pending classification or while in holdover status, you will not receive an administrative detention order.
- (b) Disciplinary segregation status. When you are to be placed in disciplinary segregation status as a sanction for violating Bureau regulations, you will be informed by the DHO at the end of your discipline hearing.

#### **§ 541.26 Review of Placement in the SHU.**

Your placement in the SHU will be reviewed by the Segregation Review Official (SRO) as follows:

- (a) Three-day review. Within three work days of your placement in administrative detention status, not counting the day you were admitted, weekends, and holidays, the SRO will review the supporting records. If you are in disciplinary segregation status, this review will not occur.
- (b) Seven-day reviews. Within seven continuous calendar days of your placement in either administrative detention or disciplinary segregation status, the SRO will formally review your status at a hearing you can attend. Subsequent reviews of your records will be performed in your absence by the SRO every seven continuous calendar days thereafter.
- (c) Thirty-day reviews. After every 30 calendar days of continuous placement in either administrative detention or disciplinary segregation status, the SRO will formally review your status at a hearing you can attend.
- (d) Administrative remedy program. You can submit a formal grievance challenging your placement in the SHU through the Administrative Remedy Program, 28 CFR part 542, subpart B.

#### **§ 541.28 Protection case—review of placement in the SHU.**

- (a) Staff investigation. Whenever you are placed in the SHU as a protection case, whether requested by you or staff, an investigation will occur to verify the reasons for your placement.

- (b) Hearing. You will receive a hearing according to the procedural requirements of § 541.26(b) within seven calendar days of your placement. Additionally, if you feel at any time your placement in the SHU as a protection case is unnecessary, you may request a hearing under this section.
- (c) Periodic review. If you remain in administrative detention status following such a hearing, you will be periodically reviewed as an ordinary administrative detention case under § 541.26.

# Attachments

## Non-Confidential Attachment

- Program Statements and Reference Documents, July – September 2025

## Confidential Attachments (provided under separate cover)

- Confidential Quarterly Monitoring Report, July 1 – September 30, 2025
- Class Member Confidential Key, July – September 2025, Paragraphs 65 and 83
- Class Member Confidential Key, Paragraph 67
- Reduction in Sentence Requests Alleging Sexual Abuse, September 2025, Paragraph 77

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