

**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**

**3rd Quarterly Status Report
October 1 – December 31, 2025**

**Submitted by
Wendy Still
Senior Monitor
U.S. District Court
Northern District Court of California**

April 14, 2026

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Introduction & Background

Introduction: This section serves as an introduction to the 3rd quarterly report 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 12 findings and recommendations and refers to “a course of action that the Monitor believes would assist the BOP in complying with this Consent Decree.”¹ Additional recommendations may be included in subsequent reports as additional information and assessments are conducted by the Monitoring Team. Furthermore, while this report is dated April 14, 2026, only information from October 1 – December 31, 2025, is included.

The Senior Monitor extends her appreciation to 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 (CMs).

Monitoring Activities: During this quarter, the Senior Monitor’s priorities centered on assessing factual findings related to the various Paragraphs of the Consent Decree. No onsite monitoring tours were conducted during this reporting period. Activities conducted include, but are 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 28², and other relevant documents;
- Participation in meetings with BOP staff, Class Counsel attorneys, the Assistant United States Attorney (AUSA), and the Court;
- Interviews with BOP staff and CMs;
- Review of Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025, December 1, 2025; and
- Review of emails from CMs, BOP staff, Class Counsel attorneys, and the AUSA.

Summary of Complaints Received, April 1, 2025 – December 31, 2025: The following chart reflects the CM population in a BOP facility since the inception of monitoring.³

Class Members in BOP Facilities ⁴								
April	May	June	July	Aug	Sept	Oct	Nov	Dec
305	300	291	281	262	262	255	251	239

In general, the population of CMs in BOP facilities has reduced from 305 in April 2025 to 239 CMs at the end of December 2025, a reduction of approximately 21.6%. Despite this reduction and as outlined in the table on the following page, complaints related to medical issues, retaliation, and staff misconduct have increased, while complaints related to Prison Rape Elimination Act (PREA) and credits have declined.

¹ Paragraph 99, Consent Decree

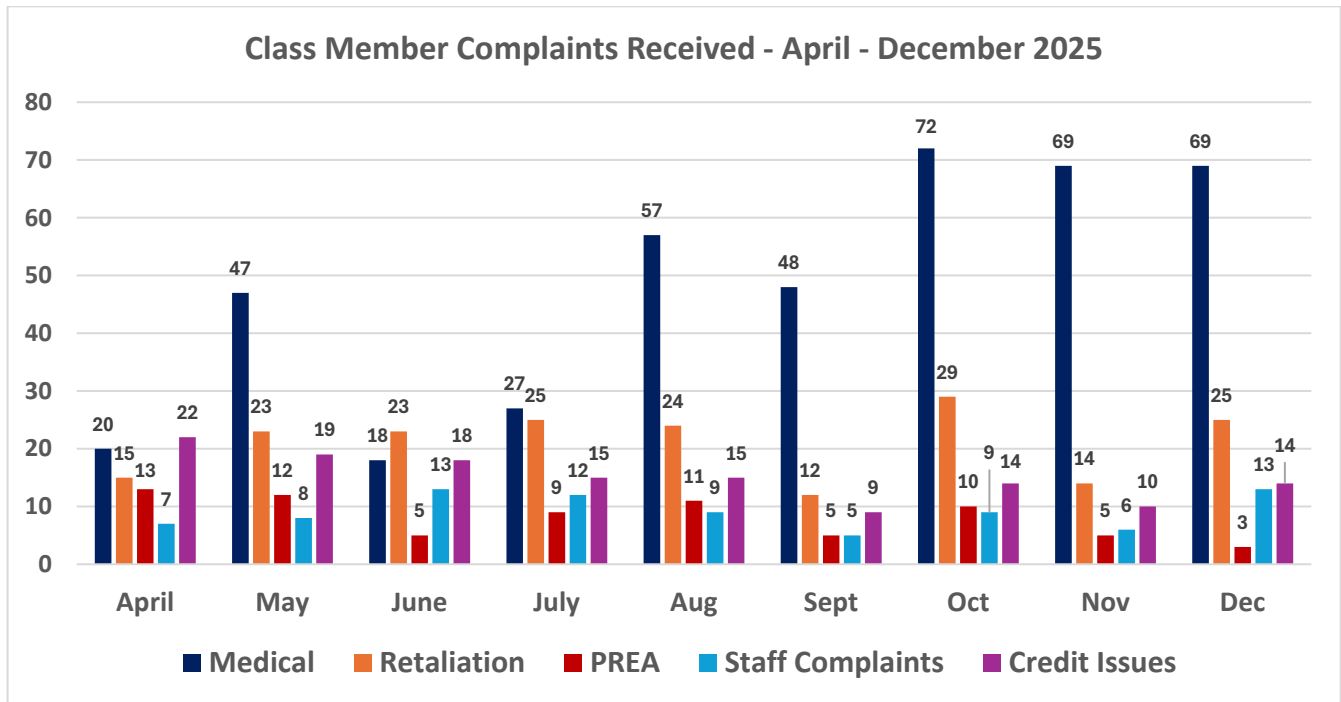
² [eCFR :: Title 28 of the CFR -- Judicial Administration](#)

³ The monitoring period for April includes March 31, 2025 given that this is the date of the enactment of the Consent Decree.

⁴ Population numbers do not reflect CMs housed in Residential Reentry Centers.

NOTE: ** The “medical” data reflected on the two charts on this page include the totality of complaints related to: (1) dentures, (2) glasses, (3) Medication Assisted Treatment (MAT), and (4) general medical and (5) mental health complaints from CMs housed in the general population and in the Special Housing Unit (SHU). It should be noted that the charts on the next two pages (pages six and seven) capture these five categories of data *separately*, and as such, they will NOT match the “medical” category numbers shown on the charts on this page. Furthermore, complaint numbers in the tables/charts below and on the following two pages reflect new complaints received from CMs and Class Counsel via email in the time period shown. The numbers do not reflect complaints collected through other methods, to include those received through the BOP Liaison, interviews, letters or telephone calls with CMs.

Class Member Email Complaints Received - 2025									
Category	April	May	June	July	Aug	Sept	Oct	Nov	Dec
** Medical	20	47	18	27	57	48	72	69	69
Retaliation	15	23	23	25	24	12	29	14	25
PREA	13	12	5	9	11	5	10	5	3
Staff Complaints	7	8	13	12	9	5	9	6	13
Credits	22	19	18	15	15	9	14	10	14

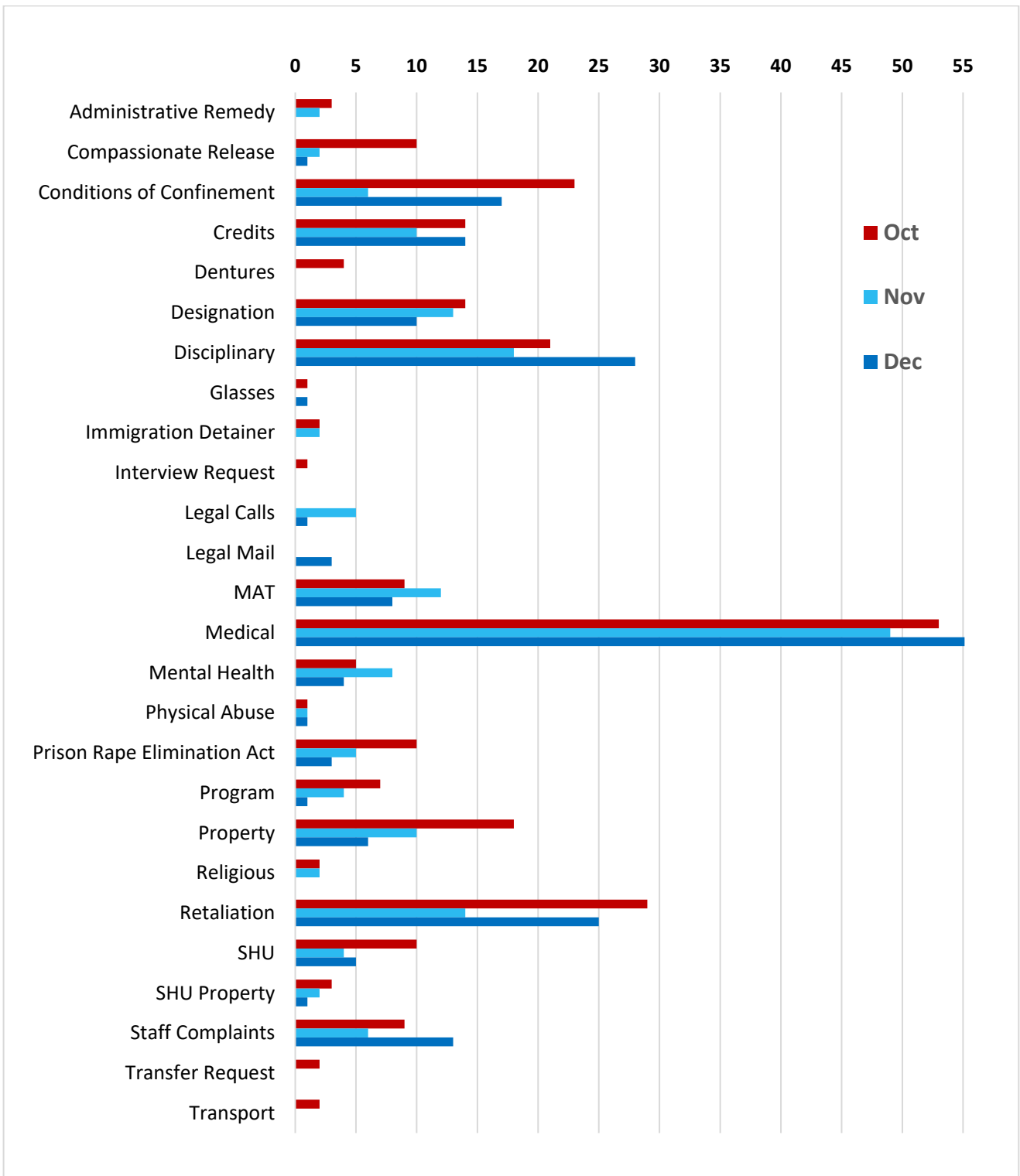


Class Member Email Complaints by Type October 1, 2025 – December 31, 2025 ⁵			
Complaint Type	October	November	December
Administrative Remedy	3	2	0
Compassionate Release	10	2	1
Conditions of Confinement	23	6	17
Credits	14	10	14
Dentures	4	0	0
Designation	14	13	10
Disciplinary	21	18	28
Glasses	1	0	1
Immigration Detainer	2	2	0
Interview Request	1	0	0
Legal Calls	0	5	1
Legal Mail	0	0	3
Medication Assisted Treatment	9	12	8
Medical	53	49	56
Mental Health	5	8	4
Physical Abuse	1	1	1
Prison Rape Elimination Act	10	5	3
Program	7	4	1
Property (General Population)	18	10	6
Religious	2	2	0
Retaliation	29	14	25
Special Housing Unit	10	4	5
Special Housing Unit - Property	3	2	1
Staff Complaints	9	6	13
Transfer Request	2	0	0
Transport	2	0	0
Total	253	175	198

The charts on this and the following page reflect more expansive data representing CM complaints received via email during this quarter. In general, complaints declined by approximately 21.7% from October 2025 to December 2025.

⁵ Rows in light blue denote a reduction, dark gray reflects an increase, and no highlight reflects no change. Medical category includes CM complaints related to medical in the general population and while housed in SHU.

Class Member Email Complaints by Type, October – December 2025



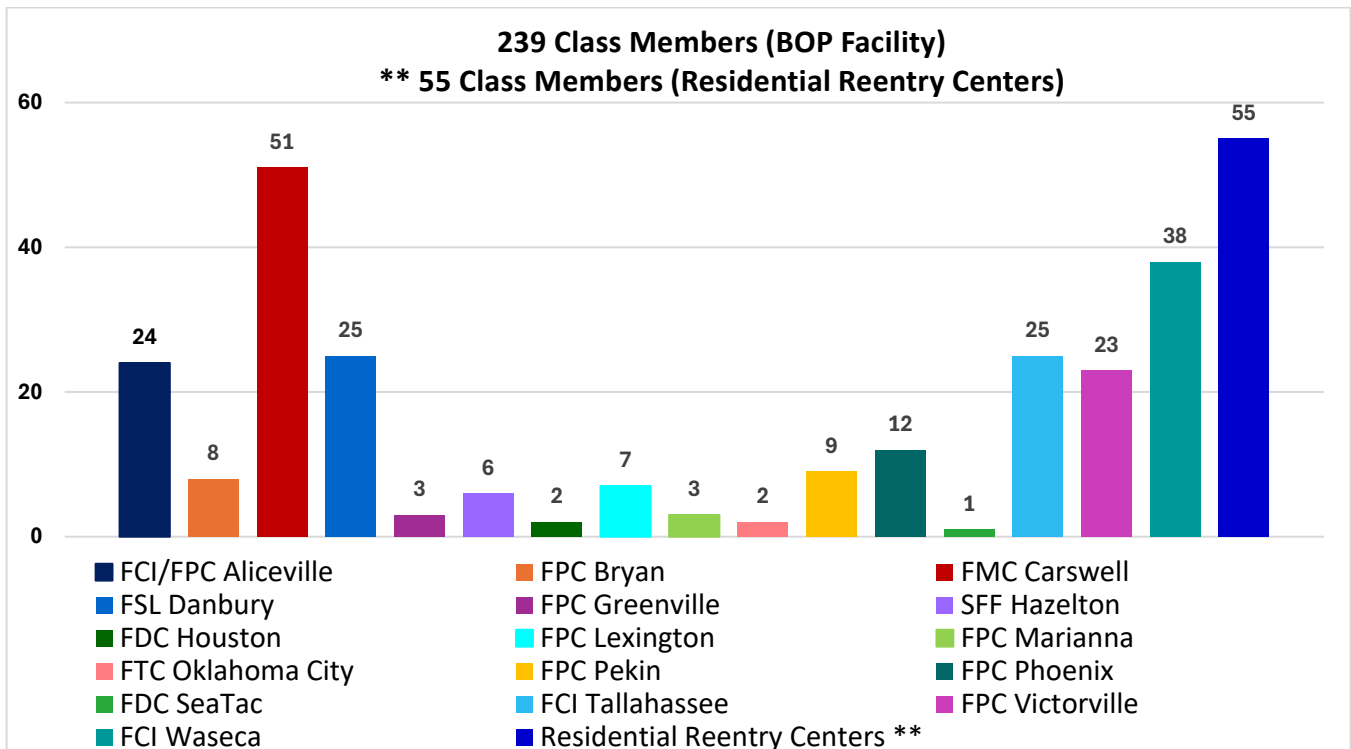
6

⁶ Categories without a corresponding colored bar represent zero complaints received for that particular month.

Category	Complaint Type Definitions
Administrative Remedy	A BOP process where inmates can request a formal review of an issue related to any aspect of their confinement.
Compassionate Release	Under 18 U.S.C. 4205(g), a sentencing court may reduce the minimum term of the sentence to time served.
Conditions of Confinement	Refers to the overall environment and circumstances that individuals experience while incarcerated, i.e., safety, health care, nutrition, access to programs and services.
Credits	Represents time credits (i.e., First Step Act, Federal Time Credit, Second Chance Act) applied toward prerelease custody or early transfer to supervised release (i.e., home confinement or Residential Reentry Center) for successfully completing approved BOP programs.
Dentures	Self-explanatory.
Designation	BOP facility where CM is housed.
Disciplinary	Complaints about the disciplinary process and/or those involved in the process (i.e., sanctions, hearing officer, incident reports, due process issues).
Immigration Detainer	A request from the U.S. Immigration and Customs Enforcement to a law enforcement agency and/or custody facility to hold an individual for a specified period of time after their schedule release.
Interview Request	Requests from CMs for an interview with the Senior Monitor or Class Counsel.
Legal Calls	CM's access to confidential legal calls with Class Counsel.
Legal Mail	Refers to an indigent CM's right to have access to postage for legal mail and for CMs, in general, to send and receive legal mail.
Medication Assisted Treatment	A comprehensive approach to treating substance use disorders with approved medications, counseling and/or behavioral therapies.
Eyeglasses	Self-explanatory.
Medical	General medical complaints, to include medications, treatment, appointments, access to sick call, the provision of medication devices, and prescription medications while housed in SHU.
Mental Health	General mental health care complaints, to include prescriptions, access to mental health treatment, counseling, therapy, etc.
Physical Abuse	CM allegations related to physical abuse by staff.
PREA	CM reports related to protections afforded under PREA; a federal law aimed at preventing sexual abuse in U.S. correctional facilities.
Program	CM access to programming activities.

Complaints	Complaint Type Definitions (continued)
Property	Refers to a CM's right to purchase and receive items from the commissary with the same frequency as the general population, to include access to reasonable personal property while housed in SHU.
Religious	Refers to a CM's right to access religious personal property while housed in SHU, to include a Bible, Quran or other religious scriptures.
Retaliation	CM complaints of alleged staff retaliation.
Special Housing Unit	General complaints related to CMs housed in SHU.
Special Housing Unit Property	Property afforded to CMs housed and/or placed in SHU.
Staff Complaint	CM complaints related to BOP staff and/or contractors.
Transfer Request	Refers to a CM's request to transfer to a BOP facility or other destination, i.e., community release or reentry program.
Transport	Refers to issues related to a CM's transport from FCI Dublin to the receiving BOP facility or other designated location.

Class Members: The following chart reflects the number of CMs by BOP facility.⁷



⁷ Reflects population roster generated by BOP and provided to the Senior Monitor on January 2, 2026. ** Chart also includes 55 CMs housed in Residential Reentry Centers, per BOP, as of February 11, 2026.

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

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	MCC	Metropolitan Correctional Center
MDC	Metropolitan Detention Center	FPC	Federal Prison Camp
SFF	Secure Female Facility		

NOTE:

- The term “**facility**” and “**institution**” are utilized 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 following sections of this report 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, October - December 2025*. Some metrics may also be mentioned in this report for emphasis.
- This report includes findings and recommendations. Recommendations from previous monitoring reports are denoted by two asterisks. **

Assessment & Recommendations

A. Medical & Mental 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:

- CM and BOP Staff Interviews
- CM Email Complaints Directly or Through Class Counsel
- Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025, and December 1, 2025
- BOP Staffing Report, January 2, 2026
- Program Statements and Reference Documents, October – December 2025, Attachment

Assessment: The following data summarizes authorized, filled, and vacant positions for medical health staff across BOP facilities housing CMs, along with calculated vacancy rates for the reporting period.

Medical Staff Vacancies by BOP Facility				
BOP Facilities	Authorized Positions	Total Filled	Total Vacant	Vacancy Rate
FCI/FPC Aliceville	25	16	9	36%
Public Health Service ⁸	2	2	0	0%
FPC Bryan	14	6	8	57.14%
Public Health Service	4	3	1	25%
FMC Carswell	125	84	41	32.8%
Public Health Service	17	13	4	23.53%
FSL Danbury	16	11	5	31.25%
Public Health Service	9	7	2	22.22%
FPC Greenville	27	22	5	18.52%
Public Health Service	1	1	0	0%
SFF. Hazelton	53	37	16	30.19%
Public Health Service	4	4	0	0%

⁸ 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.

Medical Staff Vacancies by BOP Facility
(continued)

BOP Facilities	Authorized Positions	Total Filled	Total Vacant	Vacancy Rate
FDC Houston	16	14	2	12.5%
Public Health Service	9	6	3	33.33%
FPC Lexington	95	64	31	32.6%
Public Health Service	22	19	3	13.64%
FPC Marianna	20	17	3	15%
Public Health Service	3	2	1	33.33%
FTC Oklahoma City	28	25	3	10.71%
Public Health Service	3	3	0	0%
FPC Pekin	22	19	3	13.64%
Public Health Service	2	2	0	0%
FPC Phoenix	18	12	6	33.33%
Public Health Service	3	3	0	0%
FDC SeaTac	14	8	6	42.86%
Public Health Service	5	3	2	40%
FCI Tallahassee	19	9	10	52.63%
Public Health Service	8	4	4	50%
FPC Victorville	63	32	31	49.21%
Public Health Service	5	1	4	80%
FCI Waseca	24	18	6	21.43%
Public Health Service	1	0	1	100%

Across the facilities reviewed, BOP has a total of 677 authorized combined medical and public health positions, of which 467 are filled and 210 remain vacant, resulting in an overall vacancy rate of approximately 31%. Staffing shortages are widespread and vary significantly by facility, with four out of 16 facilities operating with vacancy rates exceeding 40% to 50%. There are also two facilities with a vacancy rate that is under 20%, and include BOP medical and public health staff combined. While some facilities maintain relatively stable public health staffing, others demonstrate critical gaps, particularly in medical leadership, nursing, and public health roles. Several facilities lack key leadership positions, such as Clinical Director, Health Services Administrator, or Chief Pharmacist. This limits oversight, continuity of care, and effective clinical decision-making. These gaps are particularly concerning at FMC Carswell where there has been a vacant Clinical Director position for over two years. This vacancy results in a lack of onsite supervision of mid-level providers. Additionally, the lack of pharmacy staff at FCI Tallahassee has had a profound impact on the CMs' ability to receive medications. Facilities with the highest vacancy rates also tend to experience compounded shortages across multiple disciplines, thereby increasing operational strain on the remaining staff.

The medical staffing analysis indicates a systemic and persistent staffing shortfall within the facilities where CMs are housed. This poses significant risks to health care delivery, staff sustainability, and CM

outcomes. An overall vacancy rate of over one-third of all authorized medical and public health positions suggests that many facilities are functioning in a reactive rather than proactive health care posture. The most concerning trend is the absence of senior clinical leadership at multiple facilities, which undermines accountability, coordination of care, and compliance with clinical standards.

High vacancy rates among Registered Nurses and public health staff further strain facility operations, as these roles are essential to daily CM care, chronic disease management, intake screening, and infection control. Facilities with leadership and nursing vacancies are at an increased risk for delayed care, overreliance on temporary or overtime staffing, staff burnout, and increased grievances related to access to care. While some facilities have adequate public health staffing, the inconsistency across the system reflects uneven resource distribution and hiring challenges that require centralized attention.

NOTE: Per BOP, to continue supporting the Agency’s mission to increase staffing levels, effective January 11, 2026, Director William Marshall III approved new group recruitment incentives for Correctional Officers, Registered Nurses, Mid-level Practitioners (i.e., Nurse Practitioners, Physician Assistants), Psychologists, and Special Education Teachers. The recruitment incentives provide flexibility and may be submitted for staff outside the enumerated groups, depending on the specific circumstances. These group incentives will be offered to new hires and reflect BOP’s continued commitment to bolster staffing in critical departments, to include Health Services and Psychology.

Findings & Recommendations: Pursuant to the parameters of this Paragraph, *“if requested by BOP, the report will include recommendations for addressing low staffing levels.”* Although the Senior Monitor has numerous recommendations, BOP declined to request recommendations. Therefore, staffing recommendations are not included in this section.

A. Medical & 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 CMs are designated. If requested by BOP, the report will include recommendations for addressing low staffing levels.

Metrics:

- CM and BOP Staff Interviews
- CM Email Complaints Directly or Through Class Counsel
- BOP Medical and Mental Health Care Staffing Levels for December 2025, BOP Report
- Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025, and December 1, 2025
- BOP Staffing Report, January 2, 2026
- Program Statements and Reference Documents, October – December 2025, Attachment

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

Mental Health Vacancy Rates at BOP Facilities Where Class Members are Housed				
BOP Facility	Auth. Positions	Total Filled	Vacant	Vacancy Rate %
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	12	4	25%
SFF Hazelton	31	16	15	48.39%
FDC Houston	8	8	0	0%
FPC Lexington	29	24	5	17.24%
FPC Marianna	16	13	3	18.75%
FDC Miami	9	6	3	33.33%
FTC Oklahoma City	8	7	1	12.5%
FPC Pekin	11	8	3	27.27%
FPC Phoenix	16	11	5	31.25%
FDC SeaTac	10	7	3	30%
FCI Tallahassee	18	17	1	5.56%
FPC Victorville	31	22	9	29.03%
FCI Waseca	14	5	9	64.29%

A review of mental health staffing across BOP facilities shows widespread and uneven staffing shortages, with several facilities operating at critically reduced capacities. Across the facilities reviewed, mental health vacancy rates range from a low of 5.56% to a high of 64.29%, indicating significant variability in access to care—depending on location. While some facilities maintain relatively stable staffing, others experience substantial gaps that place increased workload on remaining staff and limit the availability of mental health services.

To address vacancies, BOP shared that to address vacancies, they are offering bonuses for staff and non-staff Psychologists, and have additionally created a new master’s level clinical position called “*Qualified Mental Health Professional*.” This expands BOP’s ability to hire other than PhD level professionals as these positions have been difficult to fill.

Facilities with vacancy rates approaching or exceeding 30% face challenges in timely assessments, ongoing treatment, crisis intervention, and continuity of care. High vacancy rates also increase the risk of delayed services, staff burnout, and reliance on temporary or collateral-duty coverage. These challenges are particularly concerning in correctional environments where mental health needs are often complex and require consistent, specialized care.

Concerns Related to SFF Hazelton & FCI Waseca:

SFF Hazelton presents a major concern with respect to mental health staffing. The facility has a mental health vacancy rate of approximately 48.39%, with 15 of 31 authorized mental health positions unfilled. Most notably, all Clinical Psychologist positions at SFF Hazelton are vacant, leaving the facility without on-site psychological leadership and severely limiting the availability of specialized mental health services. The absence of Psychologists impacts diagnostic evaluations, treatment planning, suicide risk assessments, and therapeutic interventions, placing additional strain on the remaining mental health staff and increasing clinical risk. A similar shortage exists for the Clinical Psychologist at FCI Waseca.

The current mental health staffing levels within the BOP reflect a system under strain. Persistent vacancies, particularly in specialized roles such as Psychologists, undermine BOP’s ability to meet mental health care standards and respond effectively to the needs of the incarcerated population. Furthermore, facilities with high vacancy rates are at an increased risk for treatment delays, inadequate monitoring of high-risk CMs, and increased incidents related to mental health crises.

Findings & Recommendations: Pursuant to the parameters of this Paragraph, “*if requested by BOP, the report will include recommendations for addressing low staffing levels.*” Although the Senior Monitor has numerous recommendations, BOP declined to request recommendations. Therefore, staffing recommendations are not included in this section.

A. Medical & 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:

- Bureau Electronic Medical Records System (BEMR)
- Review of BOP Notices Regarding the Process for Securing Outside Provider Care
- BOP Medical and Mental Health Care Staffing Levels for December 2025, BOP Report
- CM Email Complaints Directly or Through Class Counsel
- Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025, and December 1, 2025
- Confidential Third-Party Wait Times Report, Paragraph 37, BOP Report
- Program Statements and Reference Documents, October - December 2025, Attachment

Assessment: At the time of this review, eight CMs were awaiting outside specialty clinic appointments (third-party care). The average wait time for these appointments was approximately 12.5 months, with individual wait times ranging from 4 to 24 months. Of significant concern is one CM who has been awaiting cataract surgery since February 2024, representing a two-year delay. Additional prolonged delays include a CM awaiting specialty care since February 2024 (24 months), hearing aids since January 2025 (13 months), a gynecology appointment since June 2025 (8 months), and an endocrinology consultation since September 2025 (5 months).

Extended wait times for specialty care raise concerns regarding disease progression, preventable complications, unmanaged chronic conditions, diminished quality of life, and increased clinical risk. Delays of this length, particularly those exceeding one year, may negatively impact visual health, endocrine stability, hearing function, and women's health outcomes. Prolonged reliance on pending referrals, rather than completed specialty evaluations, may also increase BOP's liability and contribute to avoidable deterioration in patient conditions.

Wait Times & Outside Provider Care:

- Did BOP provide the Senior Monitor with monthly reports about wait times for outside provider care for CMs after May 1, 2024? **Yes**

- Did the Senior Monitor review BOP’s notice posted in English and Spanish regarding the process for securing outside provider care? **Yes**
- Did any CMs or Class Counsel make any written requests regarding the status of any CM’s request or referral for outside provider care? **Yes**
- If yes, did BOP communicate with the CM regarding the status of the request or referral, including the estimated wait time? **No. BOP clinical staff do not consistently communicate status updates and treatment plans to CMs. The Monitoring Team understands security concerns regarding informing CMs of the date(s) they are scheduled for off-site appointments. However, communicating general treatment plans and estimated timeframes to the CMs should not compromise institutional security and may reduce the volume of related complaints.**
- Did any CMs or Class Counsel make written requests regarding the status of a CM’s request or referral for outside provider care? **Yes**
- If yes, did BOP communicate with the CM regarding the status of the request or referral, including the estimated wait time? **No**

During this quarter, numerous complaints were received from CMs inquiring about the status of specialty care appointments. The examples below are representative of a broader pattern of CMs’ seeking updates and experiencing delays or circumstances where there is lack of communication regarding specialty care appointments.⁹

CM 1: Submitted two emails in December 2025 requesting an update on the status of her appointment for foot surgery.

CM 2: Submitted an email in October 2025 requesting information regarding the status of her specialty appointment and concerns related to her blood tests.

CM 3: Submitted an email indicating that she had not received information regarding a pending ultrasound.

Findings & Recommendations:

Finding 1: The Medical Experts have actively monitored wait times for specialty care within BOP, and in response, a troubling pattern of significant delays has emerged, with multiple CMs waiting more than one year for necessary specialty evaluations and treatment. Although BOP maintains a limited network of contracted specialty providers, the existing contracts appear insufficient to meet the volume and complexity of CM needs. In several instances, either the contracted providers lack the capacity to provide timely services, or BOP is failing to effectively manage and oversee these agreements to ensure access to care. As a result, CMs who may require specialty services, including cardiology, neurology, oncology, and surgical consultations—are experiencing prolonged delays that risk worsening medical conditions, unnecessary suffering, and potentially avoidable complications. These extended wait times raise serious

⁹ CM names can be found in the attachment titled *Class Member Confidential Key, October – December 2025*.

concerns regarding continuity of care, contract oversight, and BOP's ability to ensure that CMs in custody receive constitutionally adequate and clinically appropriate specialty treatment.

Recommendation 1: BOP should:

- commence weekly meetings with outside providers to enhance and/or expedite the scheduling of appointments for CMs;
- provide asynchronous specialty care support (eConsult) for clinical services amenable to this type of care;
- reevaluate contracts to ensure rates paid are competitive; and
- ensure that all local resources are optimized (academic, private etc.).

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:

- CM Email Complaints or Through Class Counsel
- CM Interviews
- Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025, and December 1, 2025
- Program Statements and Reference Documents, October - December 2025, Attachment

Assessment: Although BOP makes language line services available, evidence of whether the lines are used is dependent on staff documenting their use in BEMR (e.g., some providers document use of the language line, but it is not clear if this is a consistent practice). BOP provided billing data from vendors providing language line services and documenting usage. However, the actual CM, for which the service is provided, is not recorded on the invoice. BOP has advised that a reminder will be circulated to all facilities on the need to clearly document when language line services are used and for whom.

Language Line Accessibility:

- Are language line services available and functioning at all facilities housing CMs? **Unable to determine.**
- If the Senior Monitor is unable to determine whether language line services are consistently available and utilized in all BOP facilities, describe why: **Unless the CM submits a complaint, the Monitoring Team is unable to determine if the clinical visit was provided in the CM's primary language.**
- During this quarter, how many complaints did the Senior Monitor receive from CMs regarding denial of access to care in their primary language. **None**

Findings & Recommendations:

Finding 2: During this rating period, the Medical Experts did not receive complaints from CMs indicating that they were denied access to the language line during their clinic appointments.

Recommendation 2: For consistency and verification, BOP should remind providers of the need to document the use of the language line in BEMR, to include the name of the recipient (CM) of this service.

Wendy Still, MAS, Senior Monitor

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:

- CM Interviews
- CM Email Complaints Directly or Through Class Counsel
- Sexual Assault Prevention and Intervention Booklet, February 2025
- BOP Prison Rape Elimination Act (PREA) Homepage Website
- Review of BEMR
- Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025, and December 1, 2025
- Program Statements and Reference Documents, October - December 2025, Attachment

Assessment: During the quarter, there was not an active Memorandum of Understanding (MOU) in place at FMC Carswell for Rape Crisis Center (RCC) services. However, there were active MOUs in place for RCC services at FCI Tallahassee and FCI Waseca. Complaints were received from CMs at these facilities, indicating they were unable to receive RCC services.

On December 22, 2025, BOP provided Class Counsel and the Senior Monitor with extracted pages from the MOUs covering the RCC contracts for all BOP facilities that house CMs, except for SFF Hazelton and FPC Marianna. The MOUs for SFF Hazelton and FPC Marianna were still being routed for signature. On December 29, 2025, SFF Hazelton's MOU was subsequently provided to the Senior Monitor, but not for FPC Marianna. BOP stated that even though complete MOUs, rather than just an extract, had yet to be provided to the Senior Monitor, services were still available to CMs that might require PREA-related counseling.

BOP Response: *"On December 2025, the BOP Liaison circulated an email reminder to all facilities housing CMs to ensure CM's have access to an unmonitored line for purposes of contacting the Rape Crisis Center. The assessment and recommendations section adds that BOP should issue written notification to CMs to ensure their understanding of how to use and access RCC services. This notice is communicated during A&O and should be documented in BEMR during the intake process by Psychology. CMs also receive this information in the event they raise concerns impacting PREA. BOP, however, will take this recommendation under advisement."*

Rape Crisis Center Services:

- Are RCC services available at facilities housing CMs? **No. For a portion of this quarter, RCC services were not available at the BOP facilities cited in this section.**

- During this quarter, did the Senior Monitor receive reports of CMs being denied access to services from RCCs? **Yes. For a portion of the quarter, the Senior Monitor received reports of CMs being denied access to RCCs at the BOP facilities cited in this section.**

Findings & Recommendations:

Finding 3: The Senior Monitor has not been provided with a copy of the MOU for FPC Marianna related to the RCC contract.

Recommendation 3: Upon execution, BOP should provide Class Counsel and the Senior Monitor with a copy of the MOU for FPC Marianna.

Finding 4: Clarification is needed to ensure CMs are knowledgeable on how to access RCC services. CMs are initially informed of RCC services during Admissions and Orientation, and again during interviews with Psychology in response to a PREA complaint. However, CMs (in general) may not be aware of the methodology by which to access RCC services as a result of the time that may transpire from when they are initially oriented to when the actual need arises.

Recommendation 4: BOP should issue a written notification to CMs about the services available through the RCCs. This notification should be posted in TRULINCS to ensure CMs understand how to use and access these services.

C. Staff Abuse & Retaliation

3. Reports of Staff Physical or Sexual Abuse

65. The Monitor will review and provide in monthly reports, all reports of staff physical or sexual abuse toward Class Members. 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 Psychology Data System
- Quarterly Reports of Sexual and Physical Abuse
- CM Interviews and Complaints
- CM Email Complaints Directly or Through Class Counsel
- Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025, and December 1, 2025
- Program Statements and Reference Documents, October - December 2025, Attachment

Allegations of Sexual & Physical Abuse			
Sexual Abuse	4	Physical Abuse	3
TOTAL: 7			

Assessment: There were four reports of sexual abuse and three related to physical abuse during this quarter. A summary of the reports and BOP's response are listed below:

Sexual Abuse Reports:¹⁰

Log# 2025-188-P: CM reported that staff made her uncomfortable by the manner in which she was required to submit a urinalysis test.

BOP indicated that this matter was appropriately referred. While this case appears to describe a normal visual search and urinalysis, this CM may have felt trauma from the incident. Upon receipt of the Senior Monitor's October 2025 draft report, the Monitoring Team asked the facility to conduct a follow-up mental health meeting with the CM. The results of this meeting are memorialized in BEMR.

Log# 2025-193-P: While housed in a county jail (out to court), CM reported there was a camera in the area where she showered and dressed.

¹⁰ CM names can be found in the attachment titled *Class Member Confidential Key, October – December 2025*.

BOP indicated that upon receipt of the CM's voyeurism allegations, the facility appropriately conducted a medical PREA assessment, SAI(V), and a Warden-to-Warden notice was provided by the facility to the county jail.

Log# 2025-198-P: CM reported sexual assault from a staff member.

BOP indicated that upon receipt of the CM's allegations, the matter was referred to the appropriate investigative entity and the PREA protocol was implemented.

Log# 2025-200-P: CM reported being strip searched in SHU in a room with a window that had no covering and where staff of the opposite gender could see into the room.

BOP indicated that upon receipt of the CM's allegations, the matter was referred to the appropriate investigative entity and the PREA protocol was implemented.

Physical Abuse Claims:

Log# 2025-209-PA-R: CM reported she was pepper sprayed while in her cell, moved with force, and placed into restraints. The facility's Use of Force Committee reviewed this case with the staff involved and found that the force used was appropriate and reasonable. The Committee also identified discrepancies requiring remedial Use of Force training for the staff involved.

Log # 2025-211-PA: CM reported she was grabbed by her handcuffed wrists, and an attempt made by staff to "drag" her out of her cell. CM reported that this action ceased when another staff member approached. BOP advises that the allegations are pending investigation by the OIA.

Log# 2025-215-PA: CM reported she was abused by an Officer in April of 2025, and in response, was seen by Psychology Services. She was interviewed again in December 2025 at the request of the National PREA Coordinator. During the interview, the CM indicated that the abuse she experienced was not sexual in nature, but rather, physical.

BOP indicated that a review of this case reflects a referral to both the OIG and OIA.

Pursuant to a review of BEMR, BOP provided medical and mental health assessments of all seven CMs cited in this section. Two of the sexual assault reports, 2025-193-P and 2025-198-P, were reported to BOP (one allegedly took place in a county jail and the other resulted in the removal of a BOP staff member from the facility). The medical and mental health information for these cases were forwarded to the Senior Monitor shortly after the incidents allegedly occurred.

Findings & Recommendations:

Finding 5: BOP does not consistently forward to the Senior Monitor information regarding corrective action taken to protect CMs, including changes to CM housing and job placements, and the provision of medical and mental health assessments after a CM complains of sexual or physical abuse.

Recommendation 5: When a complaint of sexual or physical abuse is made by a CM, BOP should take corrective action and provide this information to the Senior Monitor in a timely manner. This would enable the Senior Monitor to assess whether additional corrective action is warranted.

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:

- Office of the Inspector General (OIG) Extract/Any Allegation/All Dublin Investigations Report, 4th Quarter
- BOP Report of New Cases (10) Referred to the Office of Internal Affairs (OIA)/OIG, October 1, 2025 - December 9, 2025
- CM Email Complaints Directly or Through Class Counsel
- Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025, and December 1, 2025
- Summary of Program Statements and Reference Documents, October - December 2025, Attachment

Status of Class Member PREA Reports Regarding Abuse at FCI Dublin: The report provided by BOP included cases from October 1, 2025 through December 9, 2025.

Status of Open PREA Cases Based on the OIA/OIG Report:¹¹

- **2022:** 8 cases open
- **2023:** 15 cases open
- **2024:** 376 remain open, pending a local investigation or deferral from the OIG
- **2025:** 48 cases open (9 cases were opened in this quarter)

OIA, in collaboration with local facility investigators, processes and closes 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.

To that end, an understanding was reached between BOP, Class Counsel, and the Senior Monitor that all CM allegations that do not rise to the level of criminal misconduct would 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.

Misconduct Diversion & Discipline Resolution Program:

BOP adopted a program intended to assist with improving the timeliness of their investigations. A BOP memorandum, dated December 1, 2025, indicated that effective January 1, 2026, a new voluntary program would go into effect that would provide Wardens and employees avenues by which to resolve

¹¹ The information contained in this section is based upon the investigative report provided by BOP's OIA.

routine low-level allegations of employee misconduct, without a referral to the OIA or a subsequent investigation.

Unprofessional Conduct is one of the categories included in this program. The program will also be applied retroactively to matters that have been referred to OIA and opened, but not yet investigated. Priority will be given to investigations older than 18 months.

The memorandum stated the following:

“The goal of this program is to provide employees the opportunity to resolve minor incidents in an expedient manner, avoiding the delays often experienced during the referral, investigation, and disciplinary process. The Misconduct Diversion process would fully resolve all qualifying matters, to include issuing discipline, through the use of a single form signed by the Warden/CEO or designee and the employee subject. The agreement signed by the participants in this program allows a qualifying employee to immediately take responsibility for the alleged misconduct. The employee further agrees to a disciplinary action based on a predetermined schedule.

This program has the capacity to reduce the caseload of OIA by as much as 20%. Investigators will be able to focus time and energy on more serious allegations that threaten the safety and security of staff and inmates, to include allegations surrounding contraband and abuse. This will have a net effect of safer institutions.

Institution management will benefit from the ability to immediately address and correct routine administrative misconduct in the expectation that swift and fair correction will result in changed behavior. Similarly, employees will see and experience accountability that is both fair and meaningful.”

Findings & Recommendations:

Finding 6: The current database includes all CM allegations, but is not sorted by complaint type. Based upon the volume of information and the lack of consistency in the entry of data, it is very arduous to sort. Additionally, the disposition of cases is not included, nor whether a CM was notified of the closure of their case. This lack of information makes it difficult for the Monitoring Team to report on the requirements outlined in Paragraph 65.

NOTE: Pursuant to Paragraph 64, *“Upon request, BOP shall provide CMs who report staff abuse with documentation of their report and a written final determination.”* However, the PREA standard and BOP’s Program Statement indicate the following:

- PREA Standard 115.73 states, *“Following an investigation into an inmate’s allegation that he or she suffered sexual abuse in an agency facility, the agency shall inform the inmate as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.”*
- Program Statement 5324.2, Sexually Abusive Behavior Prevention and Intervention Program, section (a) states, *“Following an investigation into an inmate’s allegation that he or she suffered sexual abuse in an agency facility, the agency shall inform the inmate as to whether the allegation has been*

determined to be substantiated, unsubstantiated, or unfounded. The Special Investigative Lieutenant provides all notifications to inmates required under this section.”

Recommendation 6: BOP should augment and update the current database (Extract/Any Allegations/All Dublin Investigation Report) to include the outcome of each case, and the date CMs were notified of their disposition.**

Finding 7: The Senior Monitor is not notified when an investigation has been completed.

Recommendation 7: Completed investigations should be forwarded to the Senior Monitor for review.**

Finding 8: Some investigations take an extremely long period of time (years) to complete.

Recommendation 8: Cases should be investigated and completed promptly to avoid witness memories fading, and to bring closure to, and instill confidence in the process for CMs.**

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:

- Closure of OIA Transportation Investigation Report
- Listing of 22 Pre-Consent Decree and 5 Post-Consent Decree Class Counsel Memorandums
- CM Email Complaints Directly or Through Class Counsel
- Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025, and December 1, 2025
- Program Statements and Reference Documents, October – December 2025, Attachment

Assessment: The OIA Transportation Investigation Report indicates there were 147 reports of injuries and mistreatment suffered by CMs during transport between BOP facilities following the closure of FCI Dublin. However, all 596 CMs originally transported from FCI Dublin to other BOP facilities were considered victims by the investigator.

The Senior Monitor was advised that an agreement was reached between Class Counsel and OIA that, as a result of similar complaints, not all CMs would be interviewed unless they explicitly expressed a desire to be interviewed. CMs were also free to refuse interviews with OIA and to request that Class Counsel be present for the interview. A representative from Class Counsel was present during the majority of interviews in which CMs requested their presence. Additionally, several supervisory and managerial staff, and 68 BOP transport officers were identified as witnesses.

CM complaints were referred to the Department of Justice's OIG, Los Angeles Field Office, on April 25, 2024, for review and classification. The OIG deferred the matter to BOP's OIA, on August 8, 2024. An OIA Supervisory Special Agent subsequently conducted the investigation.

The Supervisory Special Agent reviewed the initial information, which included common complaints reported by the majority of CMs transported from FCI Dublin. The issues reported consisted of allegations related to restraints being applied too tightly, thereby causing bruising, and a limitation on the CMs' ability to use the toilet on the transport buses. Additionally, CMs reported they observed assaults, encountered verbal abuse, endured erratic driving and intentional cold temperatures on the transport buses, and the absence of feminine hygiene products during one unorganized transport.

Although the transports all originated from FCI Dublin in April 2024, several CMs interviewed reported similar allegations on the transports from Pahrump, Nevada, to the Las Vegas Airport and subsequent transports from Atlanta, Georgia, Rockport, Illinois, and Harrisburg, Pennsylvania. Complaints were

investigated involving all staff who participated in the transportation of FCI Dublin inmates from April 16, 2024, through April 24, 2024.

After significant complaints were received from CMs regarding the initial transports, the Acting Warden from FCI Dublin stated she boarded and inspected more than half of the departing transport buses. The Acting Warden reported that all of the buses she boarded were equipped with feminine hygiene products, toilet paper, food, water, and inmate jackets. Every transport officer interviewed stated the temperature on the buses was not cold and no effort to “freeze” the CMs was made. The investigation revealed that not all transportation buses were equipped with hygiene products. Furthermore, a number of CMs reported they could not safely use the toilet on the transport bus without assistance from fellow CMs.

Medical assessments of arriving and transferred CMs were also reviewed by investigative staff. No assessment revealed serious injury resulting from the restraints. Although a number of the assessments confirmed markings and/or minor scratches, these results are consistent with wearing restraints for an extended period of time without excessive tightening or excessive force from staff.

In conclusion, according to OIA, the investigation did not reveal sufficient evidence to substantiate that BOP staff abused, acted unprofessionally, or retaliated against any CM transported during the closure of FCI Dublin.

The closure of FCI Dublin was originally ordered by BOP Director Colette Peters because the facility did not meet expected standards. While all allegations raised were explored, none alleged demeaning or retaliatory comments or actions that could be proven by a preponderance of the evidence.

Although misconduct was not sustained during the investigation, OIA recommended (in their report) that Program Statement 5540.09 (confidential) be reviewed to determine if a revision (update) was necessary, to include whether additional guidance should be included related to the transportation of female inmates. The Senior Monitor was unable to locate this Program Statement in BOP’s internal network or the public site given that it is confidential. The Senior Monitor will request a copy of the Program Statement to enable a thorough analysis of the investigative report and findings.

Closure of the investigations was completed on October 29, 2025, and a copy of the report was submitted to the Senior Monitor for review on November 6, 2025. BOP’s investigative report indicated that 22 transports were utilized to transport the 596 inmates to their receiving BOP facility. Of this total, there were no issues associated with 10 of the transports. Of the 596 CMs transported, only 20 statements were referenced in the report. The report did not state the total number of CMs that were interviewed. Although some staff stated they witnessed the effects of the lack of feminine hygiene products on the bus and that restraints may have been applied too tight, overall BOP found that the versions conveyed by the CMs were not deemed to be credible by the investigators even though numerous CMs made similar complaints over the course of several transports. Furthermore, although there were instances of BOP staff corroborating CM complaints, BOP found that these examples were “*within policy*” and without malicious intent.

BOP's investigative report indicated, *"Staff stated she checked the restraints from the plane, and she did recall a few inmates complained the restraints were tight. She stated that none of the restraints were extremely tight, but they did loosen restraints when needed. She confirmed they did not have feminine hygiene products but obtained some products. She observed two inmates get off the plane with menstrual blood on their clothes and confirmed they were cleaned before the transport."*

In general, complaints from CMs were consistent with respect to their perception that their treatment by BOP staff, during transports, was as a result of: (1) their status as an FCI Dublin CM, and (2) BOP staff's perception that the closure of FCI Dublin was directly attributed to the CMs. Given the numerous retaliation complaints the Senior Monitor has continued to receive from CMs since the closure of FCI Dublin, the potential exists that staff's behavior during these transports was simply a precursor to retaliatory behavior that CMs have conveyed they continue to experience. Despite this information, BOP did not find sufficient evidence to support complaints from CMs.

Findings & Recommendations:

Finding 9: According to the investigative report, 147 inmates suffered injuries or mistreatment during 22 transports from FCI Dublin, yet only 20 were referenced in the investigation report. However, a larger number of CMs reported improprieties during most of the transports from FCI Dublin to their designated facilities.

Recommendation 9: The Senior Monitor will request that this investigation be reopened, to include interviews with all CMs who reported abuse, rather than just a small percentage.

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:

- CM Email Complaints Directly or through Class Counsel
- Paragraph 68, Programming, Educational and Vocational Opportunities, BOP Report, Attachment
- Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025, and December 1, 2025
- Program Statements and Reference Documents, October - December 2025, Attachment

Assessment: During this monitoring period, BOP provided a roster outlining all programming, educational, and vocational opportunities available at each facility that houses CMs.¹²

In previous rosters provided by BOP, there were multiple class cancellations for each facility. In this quarter's initial roster, there were multiple facilities with no class cancellations. Only one facility reported classes not being held because of a federal holiday. When the Monitoring Team identified missing data from the roster, BOP provided an updated roster. This roster has been incorporated into the attached confidential report.

For this reporting period, BOP again failed to delineate CMs from the general population in the programming data provided. As a result, it is not possible to determine whether CMs were afforded appropriate access to programming opportunities. The absence of disaggregated data significantly limits meaningful oversight and a proper compliance review. While BOP has offered to provide instruction to the Senior Monitor on how to independently access this information, this is not a substitute for BOP's obligation to provide complete and organized data upon request.

FCI/FPC Aliceville: FCI/FPC Aliceville, located in Alabama, is a care-level 2 facility, housing 1,500 low-security female adults in custody (AICs), of which 24 are CMs.

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

¹² All facilities housing CMs are listed in the attached report titled, *Confidential Quarterly Monitoring Report, October 1 – December 31, 2025, D. Designation & Release, 1. Designations, Paragraph 68, Programming, Educational and Vocational Opportunities*. Additionally, for reference within this section, BOP does not consider Female Integrated Treatment, Resolve and the Non-Residential Drug Abuse Program (NRDAP) to be "programs."

(Literacy), Academic Success, and multiple other courses. The Vocation Program offers ACE, Carpentry, Electrician, Plumber, Heating, Ventilation, Air Conditioning (HVAC), and Welding. In addition, Cosmetology, Commercial Driver's License, SERVSAFE Food Handler, and Culinary Arts are offered, along with other programming opportunities.

The Education Program and the Vocation Programs have approximate waitlists of up to 6 months. The Psychology Program waitlists vary from 24 months for some classes to 3 months for others.

FCI/FPC Aliceville reported there were 17 class cancellations in The Barton Reading System (Literacy), which was closed due to the closure of the compound by Operations. It was also reported that the Non-Residential Drug Abuse Program (NRDAP), at this facility, had cancellations on October 27, 2025, October 31, 2025, November 17, 2025, and November 21, 2025.

FPC Bryan: FPC Bryan, located in Texas, is a minimum-security camp housing approximately 660 female AICs, of which 8 are CMs. This facility offers ACE, GED, and Academic Success. The Vocation Program includes Certified Nursing Assistant (CNA) classes, Cosmetology, and HVAC. The Psychology Program offers both RDAP and NRDAP, Resolve, Spanish Resolve, 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, and Parenting classes.

Education waitlists range from 4 weeks to one year. GED has a waitlist of 5 months. Vocation Program waitlists range from 5 weeks - 12 months. Psychology Program waitlists range from 1 - 9 months.

FPC Bryan reported no cancellations for this reporting period.

FMC Carswell: FMC Carswell, located in Texas, has a population of 1,147, of which 51 are CMs. The facility includes two housing units for minimum-security 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 18 therapeutic courses offered by the Psychology Program at this facility.

The Education Program has a waitlist of up to 6 months. Vocation waitlists range from 3 - 6 months, while the Psychology Program waitlists range from 0 – 12 months.

FMC Carswell reported cancellations for the Trauma class on November 19, 2025, December 8, 2025, December 8, 2025, and December 11, 2025. The Criminal Thinking class was cancelled on December 16, 2025.

FSL Danbury: FSL Danbury houses low-security female AICs. It is located in Connecticut and includes a satellite Federal Prison Camp designed to house minimum custody level female AICs in dormitory housing. Twenty-five CMs are housed at both facilities. FSL Danbury offers GED and ESL. It does not offer Adult Education classes, and offers only one vocation program. In the Psychology Program, FIT program is offered along with NRDAP, Trauma in Life, and four additional programs.

The Education waitlist ranges from 90 – 120 days. There is no waitlist for the Culinary Food Services line. The Psychology Program waitlist is 0 - 12 months.

Given that the facilitator was on leave, there were cancellations of Women’s Career Exploration on November 2, 2025 and November 9, 2025.

FPC Greenville: FPC Greenville, located in Illinois, houses 220 minimum-custody AICs, of which 3 are CMs. This facility offers GED, ESL, TABE (Test for Adult Assessment), and six ACE courses. Vocation programs are limited, with only a Custodial Certification Program offered.

The Psychology Programs consist of FIT, NRDAP, Drug Education, Emotional Self-Regulation, Seeking Safety, Anger Management, and Trauma in Life. FPC Greenville offers other additional programming opportunities, including Doula training, College Megatronics, and college-level courses.

The waitlist time for Education classes is 0 - 8 months, while the Vocation class has a 3 - 6-month waitlist. The Psychology Programs all have a 0 – 3 month waitlist.

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

SFF Hazelton: SFF Hazelton, located in West Virginia, houses approximately 450 low-security female AICs, of which 6 are CMs. The facility offers GED, ESL, ACE and Academic Success classes. There are also Barista and SERVSAFE classes offered. There are two Vocation programs offered, Culinary Arts and Horticulture. There are 16 additional programming opportunities offered. The Psychology Program offers seven other self-help courses.

The Education courses have a waitlist time of 0 - 5 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. This ranges from 82 - 271 AICs. The FIT program was suspended in October 2024 due to a lack of staff.

FPC Lexington: FPC Lexington, located in Kentucky, is a female satellite Federal Prison Camp housing approximately 254 low- or minimum-security female AICs of which 7 are CMs. This facility offers GED, Spanish GED, ESL, ACE and First Step Act courses. Vocation programs consist of Carpentry, Electrical, SERVSAFE and multiple apprenticeships. The Psychology Program offers Resolve, NRDAP, Parenting and 12 additional therapeutic courses. Additional programming opportunities are also offered.

The Education waitlist times range from 6 - 8 weeks. The Vocation program's waitlists depend on interest in the courses. A waitlist time was not provided by BOP. The Psychology programs provided the number of female AICs on their waitlists, not the length of time. The numbers ranged from 1 - 88 on waiting lists.

There were no class cancellations reported.

FPC Marianna: FPC Marianna, located in Florida, includes a satellite minimum-security facility housing approximately 290 female AICs, of which 3 are CMs. The Education program offers Literacy, GED, Spelling, ESL, Phonics, K2 Awareness, and Parenting. Vocation programs consist of Cosmetology and the Dog Program. Psychology offers Anger Management, Criminal Thinking, Emotional Self-regulation, NRDAP, Resolve and Trauma in Life courses. There are 23 additional self-help courses offered.

The Education waitlist is 30 - 60 days for all courses. The Vocation program waitlists are 18 months in length. The Psychology programs waitlists are 30 - 90 days.

There were no class cancellations reported for this quarter.

FPC Pekin: FPC Pekin, located in Illinois, is a Federal Prison Camp for minimum-security level female AICs, of which 9 are CMs. 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 21 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 Program which has a 6-month waitlist. Vocation programs have waitlists from 6 months to 2 years. Psychology programs offered all have 6 - 12 month waiting lists.

The Resolve class has been closed since 2024 as a result of a staff vacancy.

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 AICs, of which 12 are CMs. The facility offers GED, ESL, ACE and other education courses. There are five vocation courses offered. The Psychology program offers 21 classes inclusive of RDAP, Resolve, and Parenting. There are also additional programming opportunities, including a Dog Program.

There are no waitlists for the Education program apart from a GED class with a 4-week waitlist. Vocation programs can take up to 3 months before an AIC/CM is accepted into the program. The Psychology program waitlists range from 0 - 12 months or longer depending on the release date of the CM.

In terms of class cancellations, Narcotics Anonymous was cancelled on November 12, 2025 and December 10, 2025. Catholic and Christian Services were cancelled on October 30, 2025, December 7, 2025, and December 22, 2025 because of the unavailability of a volunteer.

FCI Tallahassee: FCI Tallahassee, located in Florida, houses approximately 1,142 low-security female AICs of which 25 are CMs. The facility offers GED, ACE, Academic Success, Barton Reading and Spelling, Hooked on Phonics, Ancients Behaving Badly, Basic French, Spanish for English Speakers, “Her” Story, Kitchen Math, The Addictive Brain, How to Deal with Conflict, Native American Myths and Legends, and Total Money Makeover. Vocation courses offered are SERVESAFE and Barista/Culinary Arts. The Psychology program offers FIT, Resolve, NRDAP, and 13 other therapeutic courses.

There are staff vacancies for the ACE course, and Barton Reading and Spelling.

The waitlists for Education range from no wait to 6 months. Wait times for Vocation programs range from 0 - 3 months. Psychology program waitlists range from 7 - 14 weeks -- depending on the CM’s release date.

FCI Tallahassee reported no class cancellations.

FPC Victorville: FPC Victorville, located in California, includes a Satellite Prison Camp housing approximately 256 minimum-security female AICs, of which 23 are CMs. This 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, Commercial Driver License, HVAC, SERVSAFE and Electrical Apprenticeship. The Psychology program offers courses such as Trauma, Seeking Safety, Resolve, and Anger Management. There are 22 additional programming opportunities offered.

The waitlist times for Education programs varied from 0 days to 1 year. Vocation waitlists are 1 year. Psychology program course waitlists range from 3 - 6 months.

For this reporting period, Resolve, Resolve Dialectical Behavioral Therapy, and Resolve Cognitive Processing Therapy were cancelled pending the selection of a candidate to fill the instructor’s position.

FCI Waseca: FCI Waseca, located in Minnesota, houses approximately 856 low-security female AICs, of which 38 are CMs. This facility provides GED, ESL, ACE, Academic Success, and Barton Reading and Spelling. A multitude of vocation programs are offered at this facility, making it the most robust of all the facilities housing CMs.

Vocation courses offered are Automotive Technician, Electric, HVAC, Pipefitter, Landscape, Teacher’s Aid, Housekeeping Apprenticeships, Stationary Engineer, Horticulture, Cosmetology, Personal Trainer, CNA, Doula, PAWS/Animal Trainer, Baker Apprenticeship, Recycling and Reclamation, Recreation Assistant Apprenticeship, Turf and Grounds Management, Cook Apprenticeship and Greenhouse Specialist. The Psychology program offers RDAP and NRDAP, and 15 other therapeutic classes. There are also additional programming opportunities offered.

There is no waitlist for education classes, to include GED, ESL, ACE and the Barton course. However, waitlists for other classes can take up to 12 months. Vocation course waitlists can range from no wait to

4 years. The Psychology program waitlist data is provided by BOP with the number of AICs on waitlists, therefore making it difficult to assess the actual waitlist time.

For this reporting period, there were multiple class cancellations, as follows:

- UNICOR Sewing was closed for the entire quarter because the program was being mothballed.
- SERVSAFE was also closed for the entire quarter as a result of a lack of funding for the testing portion of the course.
- Threshold was cancelled on multiple dates because staff were on leave and/or in training, i.e., October 15, November 19, December 17, and December 31.
- Faith Based Conflict Management was cancelled on November 26, 2025, as no volunteer was available.

Furthermore, the following courses/classes were cancelled on the following dates because staff were on leave:

- GED/ESL/ACE -- November 26, 2025 and November 28, 2025
- Horticulture, Personal Trainer, Cosmetology, November 26 and November 28
- Preparing for Success, Barton Reading and Spelling System Classes, November 26, 2025
- RDAP was cancelled on multiple dates because staff were in training and as a result of the Federal holiday, i.e., October 8, 13, 30, November 10, 11, 25, 27, and December 9.
- Peer Support Specialist Apprenticeship was cancelled for the quarter due to staffing shortages.
- The Certified Quality Improvement Associate certification program was cancelled completely at the direction of headquarters as they are discontinuing this program.

Findings & Recommendations:

Finding 10: BOP did not provide data that accurately reflects programming access and waitlists for CMs. The lack of separation between CM data from non-CM data hinders the Senior Monitor’s ability to assess if CMs are designated to facilities with adequate programming, and educational and vocational opportunities.

Recommendation 10: BOP should provide, on a consistent and ongoing basis, programming data that clearly identifies CMs separate from the general population. This data should be organized in a manner that allows the Senior Monitor to readily assess access, participation, and any disparities in programming opportunities. Training the Senior Monitor to independently extract information does not relieve BOP of its reporting responsibilities. Clear, disaggregated reporting should be required for all future reporting periods to ensure transparency, accountability, and meaningful reviews. **

D. Designation & Release

4. Compassionate Release

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:

- Reduction in Sentence Requests Alleging Sexual Abuse, Paragraph 77, December 2025, Attachment
- Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025, and December 1, 2025
- Program Statements and Reference Documents, October – December 2025, Attachment

Assessment: The following table reflects resolved requests for reductions in sentence (RIS) cases as of December 2025. This information was provided by BOP. A detailed list is included in the confidential attachments.

Reduction in Sentence Requests Status Resolved Case List	
Released Between April 1, 2024 and July 8, 2025 (4 releases were in response to approval of the RIS request)	8
RIS Denied by the Office of General Counsel	32
RIS Denied by FSL Danbury	1
RIS Denied by SFF Hazelton	1

Since April 1, 2024, four CMs have been released based requests for a reduction in sentence, of which one was released via executive clemency. Two RIS requests were denied at the facility level (FSL Danbury and SFF Hazelton), and 32 by the Office of General Counsel.

Findings & Recommendations: N/A

E. Class 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:

- CM Email Complaints Directly or Through Class Counsel
- Emails from BOP Liaison
- Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025 and December 1, 2025
- Program Statements and Reference Documents, October - December 2025, Attachment

Assessment: During this quarter, there were multiple complaints from CMs regarding confidential communication, including access to email, regular mail, and access to legal calls and/or the Senior Monitor.

Five CMs contacted the Senior Monitor or Class Counsel with complaints regarding access to legal calls or concerns related to legal mail that were not recognized or processed as such. It is notable that CMs contacted the Senior Monitor or Class Counsel regarding concerns regarding access to legal calls or legal mail being improperly handled. While the number of complaints may not represent a systemic breakdown on its face, it reflects recurring issues that directly impact access to Class Counsel and confidentiality – core protections for CMs. Complaints that legal mail was not treated as such or that legal calls were not properly facilitated -- raise concerns about compliance with established procedures and the potential chilling effect on attorney-client communication. Even isolated lapses in this area warrant close review due to the rights involved.

CM Complaints Related to Access to Legal Calls: Class Counsel Memorandum, dated November 10, 2025, includes four CM complaints (CMs 4 through 7) regarding the lack of access to legal calls.¹³ Some CMs complained they were unaware of the legal call block schedule (schedule is posted in TRULINCS) during which all CMs must have access to free, confidential phone calls with Class Counsel. Others reported they were told that the legal call block was the only time they could contact their attorneys. Still other CMs reported they requested legal calls, but Officers allegedly made it difficult by giving the CMs “*the runaround*” with respect to how to request a legal call. One CM reported being told there were not enough staff to facilitate legal calls due to the government shutdown. During this quarter, the Senior Monitor did not receive any complaints regarding a lack of confidentiality during legal calls.

CM 4: CM reported that a staff member who was consistent about providing access to legal calls according to the legal call block schedule, is no longer in the same position. Since then, the CM reports she has not been receiving access to legal calls consistently. The Senior Monitor reported this issue to BOP and the CM was provided a call. The Senior Monitor did not receive any additional complaints from this CM during this reporting period.

¹³ CM names can be found in the attachment titled *Class Member Confidential Key, October – December 2025*.

CM 5: CM was in SHU and reported making multiple requests for a legal call. When the CM was given access to the Law Library to make a legal call, the computer kiosk had been dismantled. As a result, the CM was unable to contact the Senior Monitor. The Senior Monitor raised the issue to BOP. In following up, the facility advised that the issue was a defective mouse, and as such, it was replaced. BOP reports that the computer terminal in the SHU is now fully operational.

CM 6: CM reported that the facility does not facilitate any legal calls other than during the designated call block for Class Counsel. For a legal call at any other time, the attorney may request the call, but the CM has no way to request a legal call through their Unit Team or Case Manager. This conflicts with *Program Statement 5264.08, Inmate Telephone Regulations, January 24, 2008*. The facility reported it did not have a record of a CM requesting a legal call outside of the legal call block schedule. However, the facility will reiterate to all staff that legal calls are to be allowed when requests are made by CMs outside of the legal call block schedule.

CM 7: CM was reportedly told by an Officer that *“people should not call Dublin Class Counsel for every little thing and should contact their unit manager instead.”* CM also reported that staff make it very difficult to request calls.

Findings & Recommendations:

Finding 11: Despite repeated instruction to staff, issues related to access to legal calls continue to be reported by CMs to Class Counsel and the Senior Monitor.

Recommendation 11: While BOP indicated that additional staff instruction will be provided in response to concerns regarding legal calls and legal mail, repeated reliance on training alone suggests the need for more structured corrective measures. In facilities where these issues are identified, BOP should move beyond generalized instructions and implement a documented corrective action plan that includes:

- clearly defined timelines for completion of instruction;
- mandatory attendance tracking;
- supervisory verification that policies are being followed; and
- periodic audits of legal mail handling and legal call procedures.

NOTE: When these issues are raised to the Monitoring Team, they are quickly rectified by BOP.

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:

- CM Email Complaints Directly or Through Class Counsel
- F. Processing of Damages Related to Closure due to Property Loss, Paragraph 84, Attachment
- Class Counsel Memorandums dated October 15, 2025, October 31, 2025, November 10, 2025, November 17, 2025, and December 1, 2025
- Program Statements and Reference Documents, October - December 2025, Attachment

Assessment: From March 15, 2024 through the closure of FCI Dublin on April 15, 2024, CMs 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 CM's residential addresses at BOP expense.

NOTE: The Consent Decree did not go into effect until March 31, 2025.

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

CMs 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 CMs, when a claim was denied, was confusing. Many CMs 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 CMs 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, leaving little time for CMs to file a claim. When this issue was raised to BOP by Class Counsel and the Senior Monitor, a decision was made by BOP to extend the deadline to June 15, 2025.

CMs report BOP has frequently denied or rejected claims or offered disproportionately low compensation relative to the reported value of the property lost. There appears to be inconsistency in the application of grant and deny criteria, resulting in unequal awards. This results in disparate monetary awards based on varied criteria.

The Senior Monitor and Class Counsel have worked collaboratively with BOP staff to facilitate the processing of property claims. To accommodate CMs 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 CMs refiled for reconsideration. This is reflected in the attachment titled, *Confidential Quarterly Monitoring Report, October 1 – December 31, 2025, F. Processing of Damages Related to Closure due to Property Loss, Paragraph 84.*

The two significant consequences of the property claim process were highlighted in the previous quarterly monitoring reports. Neither was communicated to CMs prior to submission of their claims. Rather, BOP responded, *“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 that 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 (Judgement Fund) owed by the CM. Individuals may owe money to the federal government which is considered a debt. If the individual does not pay the debt on time, it becomes overdue (delinquent). When the debt is overdue, the Treasury Offset Program (TOP) helps collect the debt by holding back money from a federal payment to the debtor. (Holding back money from a payment is called *“offsetting the payment”* or *“administrative offset.”*) For example, if an individual has a delinquent debt for a federal loan, TOP can reduce the individual’s federal tax refund or social security benefit payment to pay the debt.

TOP may offset many types of federal payments to collect delinquent debt. These offsets could include obligations such as unpaid child support, taxes, or overpayments of public assistance benefits. The BOP will receive notification from the U.S. Department of the Treasury when a payment has been diverted to satisfy an offset. However, the notifications are not timely. In instances where notification is received, it does not include information specifying the nature of the offset. 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 TOP to determine if the notice is actually received. As a result, the CM may not be notified, yet the responsibility falls to the CM to investigate the reason for the offset. To date, no reliable contact information for TOP has been made available to CMs.

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 CMs would learn that the cap is \$1,000. Granted, it may be found at this location; however, providing this information in the bulletin could have eliminated wasted time and effort, by both BOP staff and CMs, and the *“back and forth”* associated with processing the paperwork.

Additionally, previous BOP 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 CM. As a result, there is no

mechanism within the BOP to distinguish between claims that were paid to the individual and those that were 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 now added “*offset*” next to PAID to assist in distinguishing between the two. However, BOP does not consistently receive notification of the offset. Without this information, it cannot be added. The Senior Monitor continues to work towards identifying and providing a viable point of contact to assist CMs in obtaining information related to offset actions. To date, there are 283 documented property claims that have been formally submitted to the BOP. Partial data has been updated to reflect whether claims were offset.

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

Findings & Recommendations:

Finding 12: While the number of documented property claims provides some insight into the scope of the issue, the information provided by BOP remains incomplete. The partial update of data to reflect reconsiderations and Treasury offsets does not allow for a full assessment of how property claims are processed or resolved. Ongoing concerns raised in Class Counsel memoranda further indicate potential systemic issues in the reimbursement practices of CM property claims. As a result, it is not possible at this time to determine whether property claims are being processed in a timely, consistent, and compliant manner. Continued monitoring is necessary to ensure that all claims are carried out through final resolution.

Recommendation 12: BOP should ensure that complete and accurate data is provided for all CM property claims, reflecting clear documentation of the status of claims, including reconsideration status and payments. BOP should also review its internal processes to identify and address any delays or inconsistencies in the handling of property claims. **

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.



Wendy Still, MAS
Senior Monitor

April 14, 2026

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
MOU	Memorandum of Understanding
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
RIS	Reduction in Sentence
SCA	Second Chance Act
SHU	Special Housing Unit
SLN	Sign Language
TRULINCS	Trust Fund Limited Inmate Computer System
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).¹⁴

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

¹⁴ [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 CM 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 CM, 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, October – December 2025

Confidential Attachments (provided under separate cover)

- Confidential Quarterly Monitoring Report, October 1 – December 31, 2025
- Class Member Confidential Key, October - December 2025
- Paragraph 68, Programming, Educational and Vocational Opportunities, BOP Report
- Reduction in Sentence Requests Alleging Sexual Abuse, Paragraph 77, December 2025
- F. Processing of Damages Related to Closure due to Property Loss, Paragraph 84

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Paragraph 68, Non-Confidential FCI Dublin Consent Decree Quarterly Monitoring Report, Programming, Educational and Vocational Opportunities (BOP Report)	68
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