Attachment B

Analysis of the August 2016 OIG Report entitled "Review of the Federal Bureau of Prisons (BOP) Monitoring of Contract Prisons"

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Background

The Office of the Inspector General (OIG) of the U.S. Department of Justice, issued a Report in August of 2016 on the Review of the Federal Bureau of Prison (BOP) Monitoring of Contract Prisons ("OIG Report").

The original purpose of the OIG Report was primarily to examine how the BOP monitors the privately managed, Criminal Alien Requirement ("CAR") prison facilities. The OIG report subsequently expanded into an analysis of how the CAR contract prisons and similar BOP institutions compared with regard to inmate safety and security.

Their finding was that, in most key areas, contract prisons incurred more safety and security incidents per capita than comparable BOP institutions. And, that the BOP needs to improve how it monitors contract prisons in several areas.

The OIG Report and Findings subsequently led to an August 18, 2016 memorandum by Sally Q. Yates, Deputy Attorney General ("DAG Memo," Attachment A), directing the BOP to reduce and ultimately end the use of private prisons based on the following reasoning:

> "Private prisons served an important role during a difficult period, but time has shown that they compare poorly to our own Bureau facilities. They simply do not provide the same level of correctional services, programs, and resources; they do not save substantially on costs; and as noted in a recent report by the Department's Office of Inspector General, they do not maintain the same level of safety and security. The rehabilitative services that the Bureau provides, such as educational programs and job training, have proved difficult to replicate and outsource – and these services are essential to reducing recidivism and improving public safety."

Purpose of Analysis

This analysis reviews the history and purpose of the BOP private prisons, the OIG Report methodology and its findings.

Summary of Analytical Findings

I. The OIG Report facility performance ratings actually indicate that private prisons are in fact comparably as safe and secure, therefore contradicting the DAG Memo on this issue. Moreover, in many important respects the OIG Report indicated that the private prisons were safer by having lower monthly rates than the BOP per 10,000 beds in the following indicators:

- Drug confiscations
- Rate of deaths (one third)
- Inmate fights
- Suicides
- Disruptive behavior incidents
- Uses of force
- Overall grievances
- Medical and dental grievances
- Grievances in Special Housing Units
- Positive drug tests
- Guilty findings on inmate sexual misconduct against inmates
- Allegations of staff sexual misconduct against inmates

II. With respect to cost savings, the OIG Report states that the BOP reports the private prison per day per bed cost to be $22,159, which represents a more than 12% cost savings when compared to the $25,251 per day per bed cost for comparable BOP-operated facilities for FY 2014. In fact, the FY 2015 BOP Per Capita Cost for low security facilities resulted in a total daily cost of $80.20 inclusive of BOP support costs resulting in an annual cost of $29,273. The privately operated institutions had a daily cost of $63.35 for an annual cost of $23,122 inclusive of overhead costs. Therefore, the privately operated CAR prisons achieved a 21 percent cost savings over the comparable BOP low security facilities. This contradicts the DAG Memo which states there are no substantial savings of cost by private prisons.

III. With respect to inmate rehabilitation programs, the OIG Report stated that each of the three private prisons visited "offered inmate programs that exceeded the minimum requirements of the contract. This contradicts the DAG Memo which states that private prisons do not provide the same level of correctional services, programs, and resources.

IV. The DAG Memo directing the BOP to reduce and ultimately end the use of private prisons holding approximately 25,000 Criminal Aliens gives rise to public safety concerns as to how the BOP would absorb these inmates into the BOP system which is presently overcrowded at low security facilities by in excess of 20 percent.

Analysis

Background to the Development of the Privately Managed Criminal Alien Requirement (CAR) Private Prisons

Between 1980 and 2013, the federal prison population increased by almost 800 percent to a high of 220,000 inmates. In 1996, congressional budget request, the White House proposed a plan to hire contractors to run several Bureau of Prisons facilities.

> "Privatizing Federal Prisons: The budget includes $73 million to activate six new Federal prison facilities and expand capacity at five others. The Federal Prison System also will expand its capacity and cut costs through privatization. While the Bureau of Prisons widely uses private facilities to house juvenile offenders and prisoners near the end of their sentences, the Administration plans to privatize the management and operations of most future Federal facilities under construction."

In 1997, Congress authorized and funded a pilot privatization project with a BOP facility in Taft, CA.

In 1999, the BOP began to issue Requests for Proposals for its CAR (Criminal Alien Requirement) facilities. The CAR population was defined as "illegal aliens who have been convicted of a crime in the United States." The private prison population is classified as low security, adult males, primarily criminal aliens with usually 90 months or less to serve on their sentences.

There is no indication that Congress ever intended for the privately managed CAR facilities to provide for the same level of rehabilitative programming as that given to U.S. citizens in BOP facilities.

The business sector responded to this critical Federal need by financing, constructing, and operating more than a dozen facilities costing several hundreds of millions of dollars.

The private sector beds expanded BOP capacity by approximately 30,000 beds, representing 15 percent of the BOP inmates. This contribution by the business sector materially enabled the BOP to carry out its unique responsibility in protecting public safety.

The BOP, in awarding contracts to private companies for the CAR program, generally made awards to the company providing the best value, based on the contractor's qualifications, experience, and particularly, price.

Recognizing the need to achieve cost savings for U.S. taxpayers, the private sector engaged more than a dozen rural communities that were in need of economic stimulus and jobs. In some cases, local governments participated in facilitating the financing of CAR facilities that were subsequently privately managed. The newly constructed, privately managed CAR facilities often became the largest employer in the community. The privately managed CAR prisons became a financial centerpiece in the local economy.

The OIG had a problem in finding a BOP Comparison to the 14 Privately Managed CAR Prisons

For any individual private corrections company, the thought of being compared to the BOP is quite intimidating. Clearly, the BOP, with 200,000 inmates and 40,000 employees, is the largest and most professional correctional organization in the world. Its leadership, policies and procedures are widely admired and often emulated when resources are available.

The challenge for the OIG, to find a basis of comparison to the private sector prisons, was a difficult one.

The fourteen (14) private prisons with approximately 28,000 beds had an inmate population of approximately 96 percent non-US citizen criminal aliens. Their criminal activity was based in drug trafficking, or multiple immigration offenses. This inmate profile was exactly what the Criminal Alien Requirement (CAR) procurement program established as the population to be served by the private sector correctional organizations.

The comparison problem was, simply, that the BOP did not have any criminal alien facilities that were exclusively designated for criminal aliens. Instead, the BOP has historically distributed its own 20,000 to 25,000 criminal aliens, across its one hundred twenty-two (122) facilities. This BOP policy of not concentrating criminal aliens in any one BOP facility continues today.

The fallback position for the OIG was to create its own BOP facilities comparison group, which unfortunately, resulted in the apples to oranges analysis.

The OIG report stated that it selected fourteen (14) male low security BOP facilities, of a similar size and similar geographic area. The BOP had approximately twenty-seven (27) male low security prisons from which the OIG could have selected for comparison. The OIG finally selected fourteen (14) low security BOP prisons that were typically of a smaller size, and six (6) of which were not separate stand-alone prisons at all, but part of a larger complex. Again, the BOP did not have any exclusive Criminal Alien prisons to provide a means of comparison for the OIG.

The BOP and Privately Managed Prisons Being Compared Were Significantly Different in Aggregate Capacity and Inmate Demographics

The fourteen (14) privately managed prisons at 28,000 inmates were 24% larger in population than the fourteen (14) BOP prisons at approximately 22,600 inmates. This is puzzling because the BOP's 27 male low security prisons had a total census in excess of approximately 35,000 inmates. The OIG could have provided a more comparable BOP prison comparison. Instead, the fourteen (14) private prisons with more prisoners would give rise to the likelihood of more incidents of all types, than the 14 BOP prisons with fewer prisoners.

According to the OIG Report, the inmate population of the fourteen (14) BOP Low Security Facilities was approximately twelve (12) percent non-U.S. citizens. Comprised primarily of U.S. citizens, the BOP inmate population was homogenous culturally and linguistically. The criminal offenses of the low security BOP inmates were typically drugs, non-violent sexual offenses, and white collar crimes, with minimal gang affiliation.

The fourteen (14) private prisons, having a capacity of 28,000 beds, had an inmate population that was comprised of approximately 96 percent criminal aliens. These criminal alien inmates belonged to many different cultures, and speaking different languages and dialects, giving rise to predictable conflicts. The offenses of the criminal alien population typically involved drug trafficking or multiple immigration offenses.

The OIG analysis is fundamentally overshadowed by its own self admission on page twenty-one of the report that concedes different inmate demographics will produce different facility performance results:

> "As the BOP emphasized in response to a working draft of this report, no two BOP or private facilities are identical demographically. We acknowledge that inmates from different countries or who are incarcerated in various geographical regions may have different cultures, behaviors, and communication methods. The BOP stated that incidents in any prison are usually a result of a conflict of cultures, misinterpreting behaviors, or failing to communicate well. One difference within a prison housing a high percentage of non-U.S. citizens is the potential number of different languages and, within languages, different dialects. Without the BOP conducting an in-depth study into the influence of such demographic factors on prison incidents, it would not be possible to determine their impact."

The BOP's July 25, 2016 Response to the OIG Draft Report was even more on point in countering against drawing comparisons of contract facilities to BOP institutions.

> "The Bureau of Prisons (BOP) appreciates the opportunity to respond to the open recommendations from the draft report entitled OIG Review of the Federal Bureau of Prisons' Monitoring of Contract Prisons. However, we continue to caution against drawing comparisons of contract prisons to BOP operated facilities as the different nature of the inmate populations and programs offered in each facility limit such comparisons. Despite this caution, the BOP agrees with the recommendations as noted below."

Given the vastly different demographic groups in the private and BOP prisons it is unclear why the OIG would move forward with a comparative analysis that would ultimately undercut the validity of any meaningful findings or conclusions.

The OIG did not have the factual basis to construct an argument that a difference in private prison performance measurements had a causal relationship to private prison management.

But the OIG Report advanced that narrative anyway.

The OIG Approach to Prison Performance Measurement

It is unclear why the OIG Report did not use the following nationally recognized performance instruments for its comparison study:

- The Federal Contractor Performance Assessment Reporting System (CPARS), which is generally an annual assessment conducted by the three (3) on-site BOP Monitoring Staff to include 1 Senior Secure Institution Manager, 1 Secure Oversight Manager, and 1 Contracting Officer.

  - The BOP CPAR ratings for privately managed CAR facilities are as follows: Exceptional, Very Good, Satisfactory, Marginal, and Unsatisfactory.

  - The time period covered is usually the prior twelve months of performance.

  - There are five categories that are reviewed to include the following: Quality of Service, Business Relations, Management of Key Personnel, Utilization of Small Business, and Timely Performance.

  - Each CPAR also includes a recommendation by the Contracting Officer's Technical Representative as to whether he/she would recommend future contracting of services.

- American Correctional Association (ACA) is the nationally recognized professional association accrediting prisons, jails, and community reentry facilities throughout the United States.

  - The accreditation period is for three (3) years.

  - The duration of the accreditation audit is three days on site with three (3) ACA auditors.

  - The ACA audit instrument has in excess of 500 ACA operation and design standards.

- The Joint Commission (TJC) is an independent, not for profit that accredits and certifies over 21,000 healthcare organizations in the U.S.
  - The accreditation period is for three (3) years.
  - The duration of the accreditation audit is approximately 3 days.
  - The TJC audit instrument consists of 188 Standards which contain 1,172 Elements of Performance.

All three national prison performance instruments were available for the 14 privately managed CAR prisons, yet the OIG did not use any of them.

A review of GEO's national ratings for its six (6) CAR facilities would have revealed the following:

- All six GEO CAR facilities presently have an ACA score between 99.28% and 100 %.
- All six GEO CAR facilities are fully accredited by The Joint Commission (TJC) regarding their health care services.
- All six GEO CAR facilities presently have very high BOP CPAR ratings for Quality of Service.

OIG Prison Performance Measurement Methodology

It is unclear why the OIG report states that the following eight (8) categories selected by the OIG are relevant to the American Correctional Association (ACA) standards.

	Security Categories	**Security Indicators**
1.	contraband	four (4)
2.	reports of incidents	ten (10)
3.	lockdowns	one (1)
4.	inmate discipline (guilty findings)	one (1)
5.	telephone monitoring	one (1)
6.	grievances	ten (10)
7.	urinalysis drug testing	two (2)
8.	sexual misconduct	two (2)
		thirty-one (31)

- None of the OIG eight (8) categories are recognized ACA Mandatory Standards. Though all standards are important, one could say that the OIG categories are not ones that directly affect life, health or safety of offenders and correctional employees.
- There is no list of "key" standards or "safety and security indicators" in ACA.
- Two (2) of the categories listed, "lockdowns" and "telephone monitoring," are not addressed by any ACA standard.
- ACA Standards for all prisons, public or private, are the Adult Correctional Institutions (ACI) standards.
- To be accredited, an ACI facility must pass 100% of the 61 mandatory standards and at least 90% of the 464 non-mandatory standards. Total number of standards: 525
- "Mandatory standards" are defined as "Those standards which directly affect the life, health and safety of offenders and correctional employees."

The OIG developed its own numerous "security indicators" that only created confusion as to what was of substantive importance, versus what was merely procedural. Table 8 of the OIG Report (Appendix 1 to this Analysis) purports to provide a statistical comparison of private prisons with BOP facilities, based on these "security indicators."

The OIG methodology of selectively creating 31 "security indicators" had the effect of "weighting" those areas with the most indicators. In contrast, an important safety metric, such as the number of inmate deaths, was embedded in an innocuous category such as "Reports of Incidents" along with nine (9) other "security indicators", therefore diluting its statistical importance.

The OIG statistical analysis covering FY2011 through FY2014 (4 years) is a jumble of per capita calculations per 10,000 beds. Bear in mind that the fourteen (14) private sector facilities totaled 28,000 inmates with 96 percent criminal aliens, as compared to only 22,600 BOP inmates with 12 percent criminal aliens.

Thus, the OIG report was a comparison of a larger private inmate population of almost exclusively criminal aliens, to a smaller BOP population of predominately U.S. citizens.

The reporting of incidents addressed in the OIG report was also likely impacted by a difference in reporting practices between the private prisons and the BOP institutions. In the private prisons there were, at a minimum, three (3) full-time onsite monitors whose job it was to oversee the private prison operator performance and comprehensive reporting pursuant to the lengthy BOP contract.

At the BOP facilities there were no monitors, and compliance with BOP reporting practices was likely not as strict or comprehensive. This disparity may be specifically applicable to the identification of phones confiscated. The private prison operators were required by contract to count every phone found, regardless of location, compared to the less accountable BOP practice of self-reporting primarily on totals from investigative departments more closely focused on confiscated phones from inmates. Also, the OIG acknowledges that they did not compare or analyze interdiction efforts nor do they comment on the differences in reporting between the BOP and private contractors.

If safety and security were the top priorities, the private prisons did quite well in the OIG Report. In many respects the OIG Report indicated that the private prisons were safer by having lower monthly rates than the BOP per 10,000 beds in the following indicators:

- Drug confiscations: 1.6 to 3.0
- Rate of deaths (one third): 0.4 to 1.2 (54 to 127)
- Fights: 3.4 to 4.3
- Suicides: .03 to .04
- Disruptive behavior: 1.9 to 2.5
- Uses of force: 4.1 to 4.2
- Overall grievances: 65.1 to 130.0 (8,756 to 14,098)
- Medical and dental grievances: 13.4 to 14.8
- Grievances in the Special Housing Unit: 0.2 to 2.4
- Positive drug tests: 1.96 to 3.50
- Guilty Findings on inmate sexual misconduct against Inmates: 13.9 to 19.4 (based on annual average per 10,000 inmates)
- Allegations of staff sexual misconduct against inmates: 8.7 to 15.4 (based on annual average per 10,000 inmates)

The BOP institutions did better than private facilities by having lower monthly rates per 10,000 beds in the following areas:

- Cell phone confiscations: 44.2 to 432.9 (based on annual average per 10,000 inmates)
- Tobacco confiscations: 2.0 to 3.0
- Weapons confiscations: 1.9 to 3.1
- Assaults by inmates on inmates: 2.7 to 3.2
- Assaults by inmates on staff: 1.7 to 3.9
- Sexual assaults by inmates on staff: 0.02 to 0.10
- Incidents of setting fire: .05 to .15
- Suicide attempts and self-mutilation: 0.8 to 0.9
- Numbers of facilities with full and partial lockdowns: 6 to 12
- Guilty Findings on Serious Disciplinary Charges: 68.6 to 75.1
- Inmate phone calls monitored: 21.1% to 7.6%
- Grievances in selected safety and security categories 26.6 to 29.5
- Complaints about staff: 6.6 to 11.4
- Grievances regarding food: 1.2 to 1.8
- Grievances regarding institutional operations: 0.2 to 1.3

Private Prison Cost Savings

The OIG Report (on page 11) surprisingly took an antithetical approach with regard to private prison cost savings. It stated "we were unable to compare the overall costs of incarceration between BOP institutions and contract prisons in part because of the different nature of the inmate populations and programs offered in those facilities."

But the OIG Report did in fact state "The BOP does calculate the overall per capita annual and daily costs for housing inmates at BOP institutions and contract prisons." The FY2014 annual per capita costs were $22,159 for private prisons and $25,251 for BOP institutions. This represents a twelve percent (12%) costs savings by the private sector prisons. More recently, the FY 2015 BOP Per Capita Cost for low security facilities resulted in a total daily cost of $80.20 inclusive of BOP support costs resulting in an annual cost of $29,273. The privately operated institutions had a daily cost of $63.35 for an annual cost of $23,122 inclusive of overhead costs. Therefore, the privately operated CAR prisons achieved a 21 percent cost savings over the comparable BOP low security facilities.

Private Prison Rehabilitation Programs

As revealed through three site visits by the OIG assessing three different private company operations, the OIG Report concluded that all three private facilities offered inmate programs that exceeded the minimum requirements of their contract which included basic education and vocational training.

In the case of the Rivers Correctional Institution (Rivers), a GEO owned and operated facility, the OIG Report went on to state that "specialized inmate programs included commercial driver's license, building construction technology, and computer applications. In addition, Rivers offered a work program whereby inmates repaired used wheelchairs to be sent to people in need around the world. Since Rivers housed inmates to be released and returned to the Washington, D.C., area, it also had reentry and drug abuse programs." The Rivers inmate rehabilitation programming is arguably one of the most successful in the entire country. Year to date the Rivers facility has achieved 65 high school equivalency diplomas and 131 vocational training certificates.

Additionally, GEO is very proud of the inmate rehabilitation programming at the D. Ray James facility located in Folkston, Georgia. Year to date the D. Ray James facility has achieved 144 high school equivalency diplomas and 380 vocational training certificates.

The OIG Report as well as GEO's contract experience contradicts the DAG Memo regarding the alleged inadequacy of the inmate rehabilitation programs at the private CAR prisons. This issue of concern is not factually correct and further mitigated by the knowledge that the overwhelming majority of the criminal aliens will ultimately be deported to their country of origin.

OIG Conclusion and Recommendations

Based on the eight (8) categories and 31 "security indicators" created by the OIG, the report indicated that contract prisons incurred more safety and security incidents per capita in the majority of the categories examined.

The OIG conclusion stands in conflict with the fact that the private prisons had less inmate deaths, drugs, overall grievances, suicides, disruptive behavior, uses of force, and allegations of staff sexual misconduct against inmates.

The OIG admitted that neither it nor the BOP know the extent to which demographic factors play a role in these differences. To ensure the contract prisons are, and remain, a safe and secure place for housing of prisoners, the OIG recommended that the BOP:

> "Convene a working group of BOP subject matter experts to evaluate why contract prisons had more safety and security incidents per capita than the BOP in a number of key indicators, and identify appropriate action; if necessary."

The OIG Report provided three (3) recommendations to improve monitoring and oversight of BOP contract prisons:

1. Verify on a more frequent basis that inmates receive basic medical services such as initial medical exams and immunizations.
2. Ensure that correctional services observation steps address vital functions related to the contract, including periodic validation of actual Correctional Officer staffing levels based on the approved staffing plan.
3. Reevaluate the checklist and review it on a regular basis with input from subject matter experts to ensure that observation steps reflect the most important activities for contract compliance and that monitoring and documentation requirements and expectations are clear, including for observation steps requiring monitors to engage in trend analysis.

Summary & Conclusions

As stated at the outset of this analysis, it is intimidating for a private corrections organization to be compared to the BOP, which is the largest and arguably the most professional correctional organization in the world with 200,000 inmates and 40,000 employees.

The GEO Group, Inc. analysis of the OIG Report on Private CAR Prisons compared to Low Security BOP Facilities causes us to conclude that the DAG had fundamentally misinterpreted the Report. We believe the OIG Report, despite being an apples-to-oranges comparison, confirmed the following:

1. **Privately managed CAR facilities are in fact comparably as safe and secure as the low security BOP facilities, and safer in many of the "security indicators" such as inmate deaths, drugs, overall grievances, suicides, disruptive behavior, uses of force, and allegations of staff sexual misconduct against inmates.**

2. **The private sector facilities inmate rehabilitation programs are effective and established pursuant to the contract requirements, and needs of the CAR population.**

3. **The privately managed CAR facilities achieve a substantial cost savings of twenty-one (21) percent according to the BOP's FY 2015 Per Capita Costs information.**

4. **Even the BOP cautioned against drawing facility performance comparisons when using vastly different inmate populations, as was done in the OIG Report**.

COMPARISON OF SECURITY INDICATORS BETWEEN CONTRACT PRISONS AND BOP INSTITUTIONS

Table 8

Comparison of Security Indicators between Contract Prisons and BOP Institutions FY 2011 – FY 2014

KEY	
Purple	Contract prisons had a higher rate on this indicator (or, for telephone monitoring and drug testing, a lower average percentage).
Blue	BOP institutions had a higher rate on this indicator (or, for telephone monitoring and drug testing, a lower average percentage).
Green	Contract prisons and BOP institutions were roughly equal on this indicator. (See Appendix 1 for a further explanation of our criteria for determining this.)

INDICATOR		CONTRACT PRISONS	BOP INSTITUTIONS
Contraband			
Cell Phones	*4-year Total*	*4,849*	*400*
	Annual Average Confiscations per 10,000 Inmates	**317.1**	38.3
Drugs	*4-year Total*	*220*	*330*
	Monthly Average Confiscations per 10,000 Inmates	1.8	**3.0**
Tobacco	*4-year Total*	*397*	*214*
	Monthly Average Confiscations per 10,000 Inmates	**2.5**	1.9
Weapons	*4-year Total*	*418*	*206*
	Monthly Average Confiscations per 10,000 Inmates	**3.2**	1.8

Table 8 (Cont'd)

INDICATOR		CONTRACT PRISONS	BOP INSTITUTIONS
Reports of Incidents			
Assaults by Inmates on Inmates	*4-year Total*	*423*	*289*
	Monthly Average per 10,000 Inmates	**3.3**	2.5
Assaults by Inmates on Staff	*4-year Total*	*526*	*184*
	Monthly Average per 10,000 Inmates	**4.2**	1.6
Sexual Assaults by Inmates on Staff	*4-year Total*	*13*	*2*
	Monthly Average per 10,000 Inmates	**0.1**	0.02
Deaths	*4-year Total*	*54*	*127*
	Monthly Average per 10,000 Inmates	0.4	**1.2**
Fights	*4-year Total*	*459*	*465*
	Monthly Average per 10,000 Inmates	**3.9**	**4.0**
Setting a Fire	*4-year Total*	*20*	*5*
	Monthly Average per 10,000 Inmates	**0.1**	0.04
Suicide Attempts and Self-Mutilation	*4-year Total*	*125*	*89*
	Monthly Average per 10,000 Inmates	**0.9**	**0.8**
Suicides	*4-year Total*	*4*	*4*
	Monthly Average per 10,000 Inmates	**0.03**	**0.03**
Disruptive Behavior	*4-year Total*	*256*	*274*
	Monthly Average per 10,000 Inmates	1.8	**2.4**
Uses of Force (Immediate and Calculated)	*4-year Total*	*548*	*455*
	Monthly Average per 10,000 Inmates	**4.5**	3.8

Table 8 (Cont'd)

INDICATOR		CONTRACT PRISONS	BOP INSTITUTIONS
Lockdowns			
Full and Partial Lockdowns	*4-year Total*	**101**	11
	Number of Facilities with Lockdowns	**12**	6
Inmate Discipline			
Guilty Findings on Serious (100- and 200-Level) Disciplinary Incident Report Charges	*4-year Total*	*10,089*	*7,439*
	Monthly Average per 10,000 Inmates	**77.9**	64.7
Telephone Monitoring			
Inmate Phone Calls Monitored	Monthly Average Percentage of Calls Monitored	**7.6%**	21.1%
Grievances			
All Grievances	*4-year Total*	*8,756*	*14,098*
	Monthly Average Submitted per 10,000 Inmates	72.6	**121.5**
	Percent Granted	8.1%	5.2%
Grievances in Selected Safety and Security Categories	*4-year Total*	*3,969*	*2,883*
	Monthly Average Submitted per 10,000 Inmates	**32.2**	25.3
Complaints about Staff	*4-year Total*	*1,538*	*719*
	Monthly Average Submitted per 10,000 Inmates	**12.9**	6.2
Conditions of Confinement	*4-year Total*	*161*	*134*
	Monthly Average Submitted per 10,000 Inmates	**1.5**	1.2
Food	*4-year Total*	*247*	*133*
	Monthly Average Submitted per 10,000 Inmates	**2.1**	1.2

Table 8 (Cont'd)

INDICATOR		CONTRACT PRISONS	BOP INSTITUTIONS
Grievances (Cont'd)			
Institutional Operations	*4-year Total*	*171*	*20*
	Monthly Average Submitted per 10,000 Inmates	**1.1**	0.2
Medical and Dental	*4-year Total*	*1,800*	*1,609*
	Monthly Average Submitted per 10,000 Inmates	**14.3**	**14.1**
Safety and Security (Contract Prisons Only)	*4-year Total*	*25*	*N/A*
	Monthly Average Submitted per 10,000 Inmates	**0.2**	**N/A**
Sexual Abuse or Assault (BOP Institutions Only)	*4-year Total*	*N/A*	*9*
	Monthly Average Submitted per 10,000 Inmates	**N/A**	**0.07**
Special Housing Unit	*4-year Total*	*27*	*259*
	Monthly Average Submitted per 10,000 Inmates	0.2	**2.4**
Urinalysis Drug Tests			
Percentage of Inmates Tested	Monthly Average	**7.1**	8.1
Positive Drug Tests	*4-year Total*	*263*	*376*
	Monthly Average per 10,000 Inmates	2.1	**3.4**
Sexual Misconduct			
Guilty Findings on Disciplinary Incident Charges of Inmate Sexual Misconduct against Inmates	*4-year Total*	*156*	*175*
	Annual Average per 10,000 Inmates	16.6	**18.1**
Allegations of Staff Sexual Misconduct against Inmates	*4-year Total*	*97*	*139*
	Annual Average per 10,000 Inmates	8.7	**14.5**

Source: OIG analysis of BOP and contractor data