



February 2021

BUREAU OF PRISONS

Opportunities Exist to Better Analyze Staffing Data and Improve Employee Wellness Programs



A Century of Non-Partisan Fact-Based Work

GAO@100 Highlights

Highlights of [GAO-21-123](#), a report to congressional requesters

Why GAO Did This Study

As of November 2020, BOP employed more than 37,000 individuals responsible for the care and custody of more than 125,000 federal inmates in BOP institutions. Questions have been raised about BOP's ability to fully staff its institutions, the effects of staffing shortfalls, and the mental health of corrections staff.

GAO was asked to examine BOP staffing levels and other related challenges. This report examines, among other objectives: (1) the methods BOP uses to assess staffing levels; (2) the practices BOP uses to address any staffing challenges, and the extent to which it assesses their effectiveness; and (3) what, if anything, BOP could do to improve staff mental health and related services. Among other methods, GAO examined program and staffing documentation and data, and interviewed BOP officials knowledgeable about budget and personnel practices.

What GAO Recommends

GAO is making 7 recommendations, including that BOP develop and implement a reliable method for calculating staffing levels, or amend existing methods; conduct a risk assessment of its overtime use; and develop and implement a method to routinely collect and evaluate employee feedback on its Employee Assistance Program. The Department of Justice concurred with our recommendations.

View [GAO-21-123](#). For more information, contact Gretta L. Goodwin at (202) 512-8777 or GoodwinG@gao.gov.

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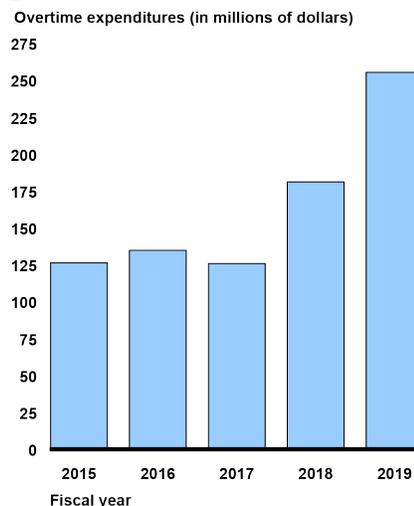
Opportunities Exist to Better Analyze Staffing Data and Improve Employee Wellness Programs

What GAO Found

The Bureau of Prisons (BOP) has multiple methods for assessing its staffing levels to determine shortfalls, but each contains inconsistencies in either terminology or methodology and we found reliability concerns with each. For two methods, BOP was unable to provide supporting documentation, and for the third, a BOP official stated that the method did not account for different institutions' characteristics. By developing a reliable method for calculating staffing levels at BOP institutions, or amending existing methods, BOP would have a more accurate picture of the extent of any shortfalls and could take corrective action to address identified workforce gaps.

BOP has practices for addressing staffing challenges, such as using overtime, but has not assessed associated risks to staff and inmate safety, such as officer fatigue and decreased observation skills. Overtime expenditures, without adjusting for inflation, have increased 102 percent from 2015 through 2019. Conducting a risk assessment of its overtime use would better position BOP to identify the potential risks of overtime and respond, as appropriate.

Overtime Expenditures at Bureau of Prisons (BOP) Institutions from Fiscal Years 2015 through 2019



Source: GAO analysis of BOP Data. | GAO-21-123

Note: Data are expenditures in nominal dollars, and have not been adjusted for inflation. For more details, see figure 4 in GAO-21-123

BOP could improve data collection efforts to enhance its employee wellness programs. For example, BOP operates an Employee Assistance Program, which provides counseling and referral services to employees, and BOP is working to improve the program. However, BOP has not collected program feedback from employees in a systematic way. By developing a method to routinely collect and evaluate feedback, BOP would be better positioned to help ensure employee satisfaction and to identify ways to continually enhance the program.

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Abbreviations

BOP	Bureau of Prisons
CDC	Centers for Disease Control and Prevention
COVID-19	Coronavirus Disease 2019
DOJ	Department of Justice
FEVS	Federal Employee Viewpoint Survey
GPRA	Government Performance and Results Act of 1993
GPRAMA	GPRA Modernization Act of 2010
OIG	Office of the Inspector General
OMB	Office of Management and Budget
OPM	Office of Personnel Management

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February 24, 2021

The Honorable Ron Johnson
Ranking Member
Permanent Subcommittee on Investigations
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Mike Braun
United States Senate

The Honorable Fred Keller
House of Representatives

The Bureau of Prisons (BOP) within the Department of Justice (DOJ) was responsible for the custody and care of more than 125,000 federal offenders at 122 federal institutions, as of November 2020.¹ The Bureau employs more than 37,000 individuals to help fulfill this mission. In fiscal year 2020, BOP's appropriation for salaries and expenses was \$7.47 billion.²

Although BOP's inmate population has declined 25 percent since 2015, questions have been raised about BOP's ability to fully staff its institutions—that is, employing as many staff as authorized positions allow. For example, since at least 2012, the DOJ Office of Inspector General (DOJ OIG) has identified BOP-related topics, including declining resources, in its annual report of top management challenges facing DOJ.³ Further, we have previously reported about concerns related to

¹About 29,000 additional federal offenders are confined in privately managed or other types of facilities.

²Consolidated Appropriations Act, 2020, Pub. L. No. 116-93, 133 Stat. 2317, 2402 (2019).

³Department of Justice Office of the Inspector General, *Top Management and Performance Challenges in the Department of Justice*. Memoranda for the Attorney General and the Deputy Attorney General (Annual reports 2012-2020).

staff and inmate safety and BOP's use of relocation and retention incentives to help address staffing challenges.⁴

In 2019, BOP's then-Director testified that vacancies in BOP staffing were unacceptable and were the result of several years of uncertainty about BOP budgets and the number of positions BOP was allowed to fill.⁵ Congress has also raised questions about the effect of understaffing on the health and safety of staff and inmates, the stressors of working in a corrections environment, and the impact on staff mental health and well-being.

You asked us to examine BOP staffing levels and other related challenges that BOP staff might face. This report examines: (1) the methods BOP uses to assess staffing levels and how it identifies and addresses the causes and potential impacts of any staffing challenges; (2) the practices BOP uses to address any staffing challenges, and the extent to which it assesses the effectiveness of such practices; and (3) what is known about the effects of the corrections environment on the mental health of staff and what, if anything, BOP could do to improve upon staff mental health and related services.

To address our first objective, we reviewed the three methods BOP uses for assessing staffing levels. We also analyzed BOP's institutional staffing data—from fiscal year 2015 through the second quarter of fiscal year 2020—that BOP reported using to assess staffing levels and identify staffing shortfalls.⁶ We did not analyze staffing data past March 2020 in order to avoid potential anomalies in the data due to staffing deployments associated with BOP's response to the Coronavirus Disease 2019 (COVID-19). To determine the reliability of the data for identifying staffing shortfalls, we compared the various staffing-related documents BOP

⁴See for example, *Bureau of Prisons: Better Planning and Evaluation Could Help Ensure Effective Use of Retention Incentives*, [GAO-18-147](#) (Washington, D.C.: Dec. 7, 2017) and *Bureau of Prisons: Growing Inmate Crowding Negatively Affects Inmates, Staff, and Infrastructure*, [GAO-12-743](#) (Washington, D.C.: Sept. 12, 2012).

⁵Kathleen Hawk Sawyer, Director, Federal Bureau of Prisons, Washington D.C., testimony before the House Subcommittee on Crime, Terrorism, and Homeland Security, 116th Cong., October 17, 2019.

⁶Some data BOP provided was tied to biweekly pay periods. Pay period 7 of 2020 began on March 29, 2020 and ended on April 11, 2020. To ensure we reviewed data that included all of March 2020, BOP included pay period data that extended through April 11, 2020.

provided to us for consistency in data and language, as well as to verify support for BOP officials' explanations for how BOP calculates staffing shortages. We also interviewed BOP officials responsible for maintaining and updating the data. Based on our analysis and these interviews, we determined that the data were not reliable for determining staffing shortfalls. We discuss these and other limitations in the data later in this report. In examining BOP's methods for assessing staffing levels, we also reviewed congressional testimony from former BOP directors between 2009 and 2019, and DOJ OIG's annual *Top Management and Performance Challenges* reports between 2011 and 2018 to obtain more information about BOP staffing challenges.⁷

Further, to assess how BOP identifies and addresses the causes and potential impacts of staffing challenges, we reviewed staffing-related documentation, including federal guidance on the 2017 federal hiring freeze, BOP's quarterly internal reports on the time it takes to hire employees, and various employee surveys that BOP administers.⁸

We also interviewed BOP officials from several divisions, as well as officials from DOJ's Justice Management Division, about BOP's methods for assessing staffing levels and officials' perspectives on the causes of staffing challenges.⁹ For additional context about BOP staff perceptions related to the challenges they face on the job, we reviewed documentation of non-generalizable interviews from our published reports relating to BOP for BOP staff mentions of staffing shortfalls or related

⁷Department of Justice Office of the Inspector General, *Top Management and Performance Challenges in the Department of Justice - 2011*, Memorandum for the Attorney General and the Deputy Attorney General (November 8, 2011). See Appendix II for full list of citations for years 2011 through 2018.

⁸These surveys included BOP's 2018 exit survey report for BOP employees, as well as BOP's annual Prison Social Climate Survey instruments and Federal Employee Viewpoint Survey (FEVS) instruments from 2015 through 2019. BOP's annual staff exit survey reports summarize and include analysis of the data BOP receives through employee exit surveys, which BOP provides to employees before they separate from BOP. BOP's Prison Social Climate Survey measures employee impressions and attitudes about conditions at the institution where they currently work. The Office of Personnel Management conducts the annual Federal Employee Viewpoint Survey to measure employee perceptions of whether, and to what extent, conditions characteristic of successful organizations are present in their agencies.

⁹JMD is the principal DOJ organizational unit responsible for management and administrative support for DOJ components, including BOP. JMD provides guidance that includes budget and financial management, as well as personnel management, training, and organization.

challenges. We limited our review of this documentation to work conducted since 2016 to ensure that any perspectives provided were recent. We also interviewed stakeholder groups representing inmates and former inmates to obtain their views on how staffing challenges impact the inmate experience. Though these stakeholder group interviews are also not generalizable, they provide useful insight into the impacts of staffing challenges on inmates. We evaluated BOP's efforts to assess staffing levels and to identify causes and impacts of staffing challenges against selected *Standards for Internal Control in the Federal Government*—specifically that agencies should use quality information that is current, accurate, and provided on a timely basis to achieve its objectives and inform its decisions.¹⁰

To address our second objective, we reviewed relevant BOP documentation, such as guidance on the use of overtime, augmentation, and staffing incentives, to better understand how BOP addresses staffing challenges.¹¹ We also analyzed BOP's data on use and cost of overtime and augmentation from 2019, as well as on recruitment, relocation, retention, and other incentives from 2015 through July 2020, the most recent available data at the time of our analysis.¹² We assessed the reliability of this data by interviewing knowledgeable officials regarding their data systems and how the data are used, and found the data sufficient for analyzing BOP's response to staffing challenges.

To evaluate the extent to which BOP assesses the effectiveness of its efforts to address staffing challenges, we reviewed relevant documents, including BOP's 2019 Strategic Plan and April 2020 Human Capital Operating Plan, and DOJ's Annual Performance reports from 2015 through 2019. We also reviewed the 2019 report on BOP's assessment of

¹⁰GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014). Internal control is a process effected by an entity's management, oversight body, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved.

¹¹Augmentation is the assignment of non-custody staff member, e.g., an individual responsible for educational or vocational training, to a custody role, whereby the staff member's primary task becomes the custody and supervision of the inmate.

¹²An obligation is a definite commitment that creates a legal liability of the government for the payment of goods and services ordered or received. An "expenditure" is defined as the actual spending of money. For the purposes of this report, we use the word spent when discussing BOP expenditures from fiscal years 2015 through 2019, as well as obligations from fiscal year 2020.

its retention incentive program to understand results and BOP's response to them. In addition, we interviewed BOP officials from all six regional offices and five divisions at the headquarters level, including BOP's Administration Division, which contributes to BOP's budget development and execution. We evaluated BOP's efforts against the Government Performance and Results Act of 1993 (GPRA), as updated and expanded by the GPRA Modernization Act of 2010 (GPRAMA), which directs agencies to develop and document goals, as well as performance measures to assess progress towards their goals.¹³

To address our third objective, we reviewed relevant studies included in a bibliography and literature review developed by DOJ's National Institute of Corrections.¹⁴ We also reviewed BOP documentation related to its employee wellness programs—for example, program guidance and reports on counseling and training to staff issued as part of the Employee Assistance Program and a BOP memo on suicide prevention. We also reviewed records of BOP's activation of Crisis Support Teams, which provide peer support to staff in response to critical incidents. Additionally, we reviewed BOP's records of staff deaths by suicide and compared BOP staff rates of suicide to the overall rates of suicide in the U.S. by utilizing Centers for Disease Control and Prevention (CDC) data.¹⁵ We assessed the reliability of these data by interviewing officials responsible for the Employee Assistance Program and knowledgeable of BOP's Crisis Support Team activation data, as well as analyzing for internal consistency in BOP's documentation. We determined BOP and CDC data

¹³Government Performance and Results Act of 1993 (GPRA), Pub. L. No. 103-62, 107 Stat. 285 (1993); GPRA Modernization Act of 2010, Pub. L. No. 111-352, 124 Stat. 3866 (2011). Note that GPRA, as amended and expanded by GPRAMA, creates a framework for articulating unified goals and outcome measures that can provide federal agencies with a clear direction for successful implementation of activities and improve the efficiency and accountability of agencies' efforts. Goals explain the purpose and intended results that a program seeks to achieve in its work. Outcome measures that are linked to goals allow a program to track the progress it is making toward achieving its goals. While GPRA and GPRAMA apply to the department or agency level, we have previously reported that their provisions can serve as leading practices at other organizational levels, such as component agencies, offices, programs, and projects.

¹⁴The National Institute of Corrections is an agency within BOP that provides training, technical assistance, information services, and policy/program development assistance to federal, state, and local corrections agencies. The National Institute of Corrections developed this literature review to provide an overview on what information is available on suicide by correctional officers and the impact workplace stress can have on officers.

¹⁵Age-adjusted suicide data was gathered from the National Center for Health Statistics' National Vital Statistics System.

to be reliable for purposes of comparing suicide rates among BOP staff with national rates. However, we determined that BOP's data related to its Employee Assistance Program were not reliable, which we discuss later in the report.

To identify what, if anything, BOP could do to improve upon staff mental health and related services, we compared BOP's administration of its Employee Assistance Program against OPM guidance from the Employee Health Services Handbook, which provides common methods agencies can take to evaluate their Employee Assistance Programs.¹⁶ We also evaluated BOP's use of its data on BOP staff deaths by suicide in light of its priority of ensuring the health, wellness, and safety of its employees.¹⁷ We also interviewed BOP officials and stakeholders about the effects of the corrections environment on the mental health of staff and how BOP is working to address these effects. Though our interviews with stakeholders are not generalizable, they provide insight into the impacts of the corrections environment on corrections staff.

For further information on our objectives, scope, and methodology, see appendix I.

We conducted this performance audit from October 2019 to February 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

BOP's Human Capital Operations

BOP's central office in Washington, D.C., serves as BOP's headquarters and provides oversight of BOP operations and program areas. Within the central office is BOP's Human Resource Management Division, which is

¹⁶Employee Health Services Handbook, Chapter 3: Administering Employee Assistance Programs," Office of Personnel Management, accessed August 6, 2020, "<https://www.opm.gov/policy-data-oversight/worklife/reference-materials/employee-health-services-handbook/#url=Chapter-3>"

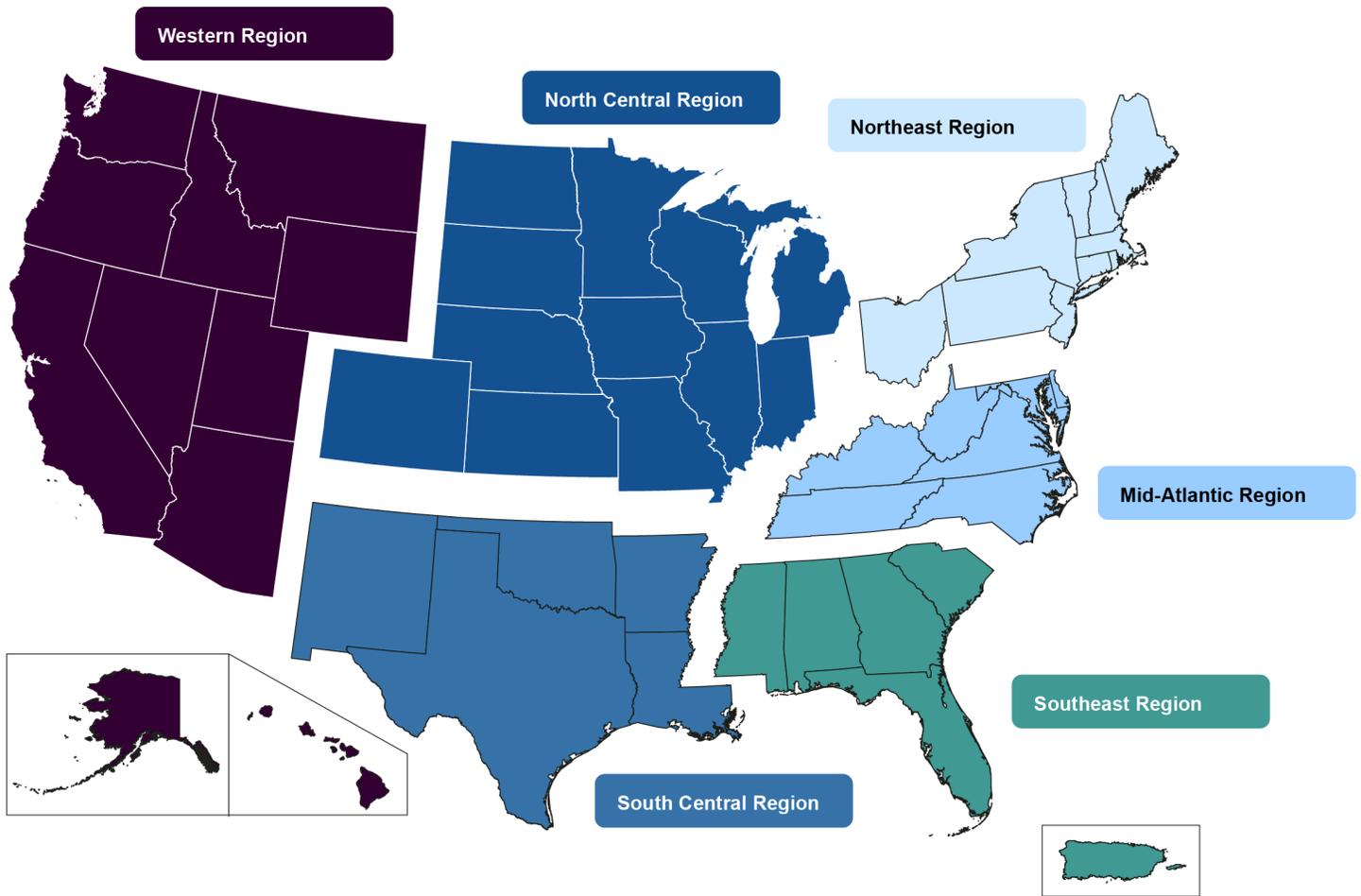
¹⁷In our assessment, we also considered standards for internal control in the federal government calling for agencies to use quality information to achieve their objectives.

responsible for developing, implementing and administering human capital operations, such as those relating to recruitment and retention.

BOP's Grand Prairie Office Complex, located in Texas, serves as a centralized office to consolidate various BOP administrative practices. In particular, this complex employs human resources staff who, among other duties, support regional offices and institutions by identifying qualified candidates and posting vacancy announcements.

BOP has six regional offices that cover the Mid-Atlantic, North Central, Northeast, South Central, Southeast, and Western regions of the U.S. (see fig.1). These offices, each led by a regional director, oversee the operations of about the same number of the federal institutions within their respective geographic regions. According to BOP officials, regional office staff are also responsible for providing local level oversight of institutions' human capital programs, such as retention incentives, and have responsibility for hiring supervisory/management positions at BOP institutions, among other things.

Figure 1: Bureau of Prisons (BOP) Regions



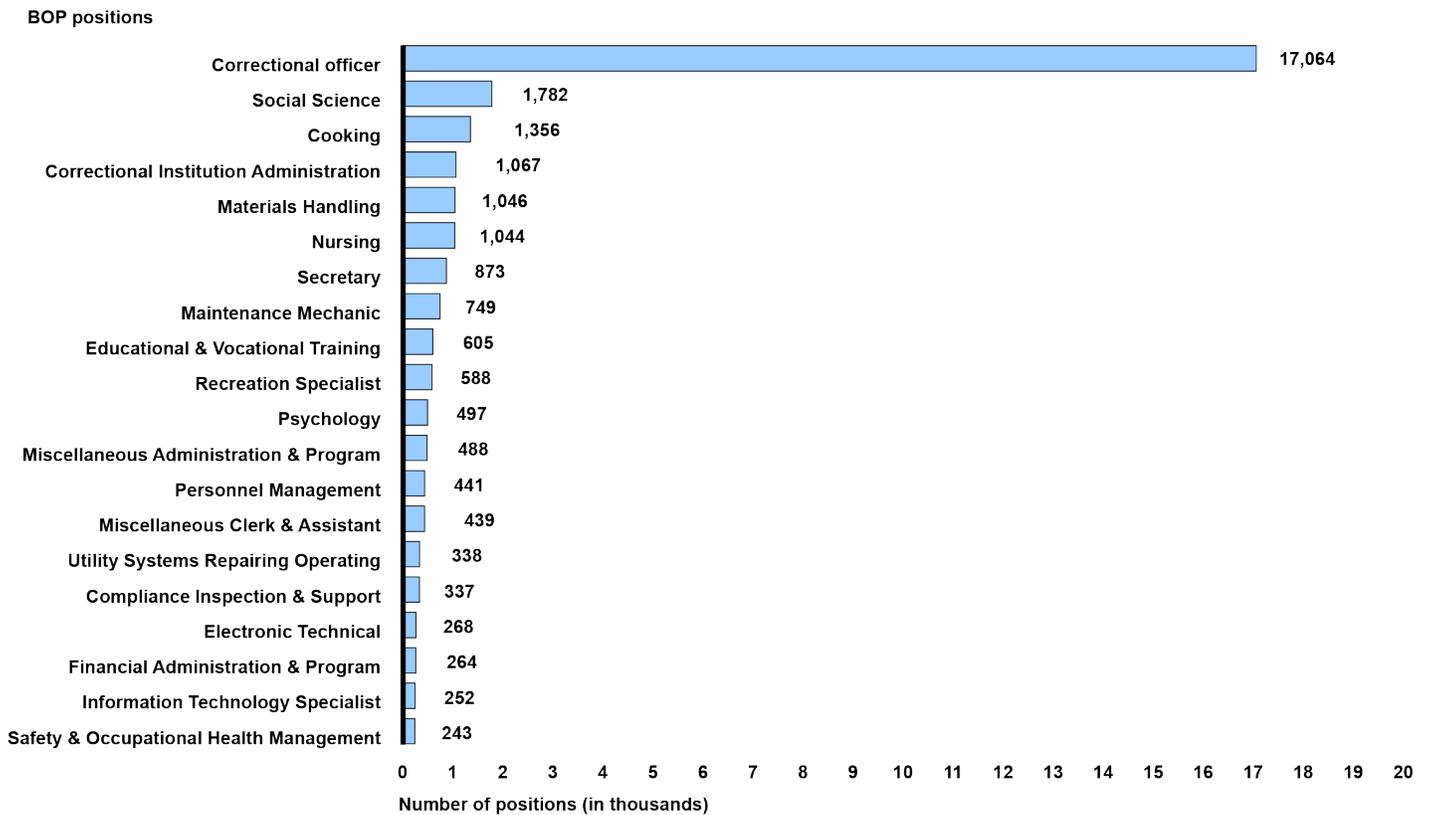
Source: GAO analysis of BOP data. | GAO-21-123

BOP institutions are managed by wardens and other officials who are responsible for administering their institutions' human capital policies. Individual institutions also have responsibility for hiring all non-supervisory/management staff.

Composition of BOP's Workforce

The majority of BOP institutions had between 250 and 750 employees, as of March 2020. Correctional officers represent the largest segment of BOP's workforce, and are responsible for inmate custody and supervision (see fig. 2).

Figure 2: The 20 Staff Positions at the Bureau of Prisons (BOP) Employing the Highest Number of Staff, as of March 2020



Source: GAO Analysis of BOP data. | GAO-21-123

BOP's Hiring Process

In general, federal government-wide personnel management laws and related provisions govern BOP employment and hiring procedures. The federal hiring process, known as competitive examining, requires BOP and other agencies to notify the public that the agency will accept applications for a job, screen applications against minimum qualification standards, apply selection priorities such as veterans' preference, and assess applicants' relative competencies or knowledge, skills, and abilities against job-related criteria to identify the most qualified applicants. Like other agencies, BOP typically assesses applicants by rating and ranking them based on their experience, training, and education.

Congress and the President have created a number of additional hiring authorities—beyond competitive examining—to expedite the hiring process or to achieve certain public policy goals. One such hiring

authority, called “direct hire authority,” is used to help agencies fill vacancies under certain circumstances. OPM is authorized to permit agencies to use direct hire authority for positions where OPM has determined that there is either a severe shortage of candidates or a critical hiring need for such positions.¹⁸ This direct hire authority expedites the typical hiring process associated with the competitive examining hiring process by eliminating competitive rating and ranking procedures and veterans’ preference.

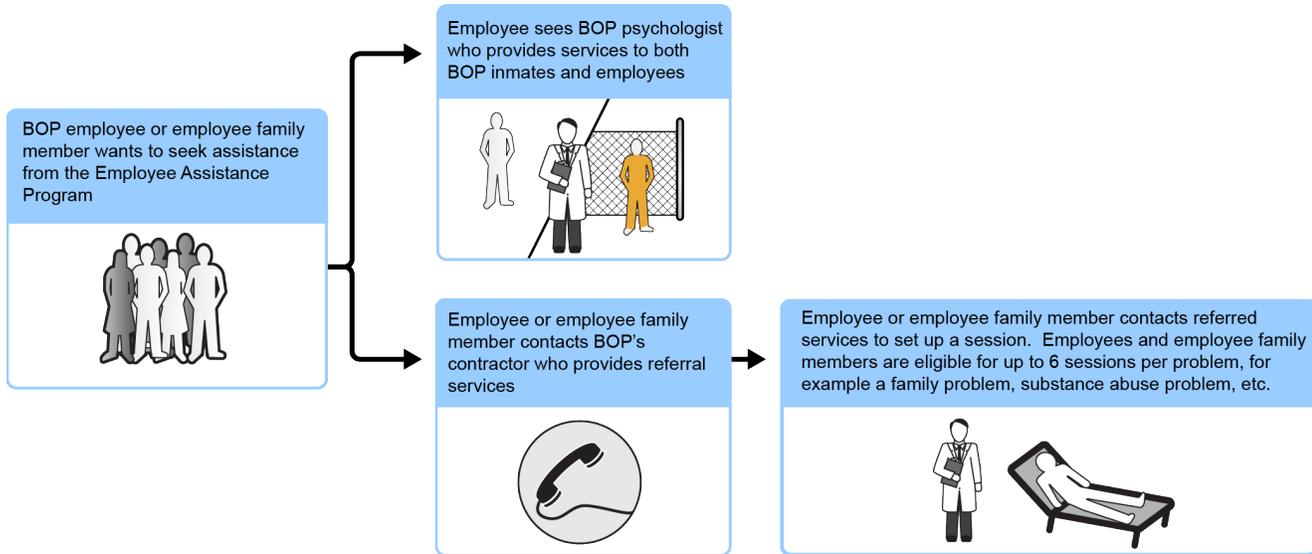
BOP has applied to OPM for direct hire authority twice. The first time was in October 2019, when it reported that hiring had slowed while attrition continued. OPM stated that BOP had not provided sufficient evidence to meet the program criteria for demonstrating a critical hiring need. BOP applied a second time in March 2020, revising its application to focus on just one type of position—correctional officers—for which it stated it had a severe shortage of candidates. In September 2020, OPM determined that BOP’s revised submission did not provide sufficient support of a severe shortage of candidates.

BOP’s Employee Assistance Program

Like many other federal agencies, BOP offers an Employee Assistance Program that provides voluntary and confidential services to staff, such as counseling and referrals for personal or work related concerns. Such concerns can include substance abuse, stress, grief, family problems, and psychological disorders. In-house BOP psychologists and a contracted Employee Assistance Program provider are both available to provide assistance to staff through BOP’s Employee Assistance Program, and employees can choose how they wish to access program resources (see fig. 3). Employees’ family members can also access the Employee Assistance Provider through the contracted provider. According to BOP officials, in-house services may be a good option in rural areas where there is limited availability of outside psychologists. However, the contracted Employee Assistance Program provider may be preferred because staff would have the benefit of privacy, for example not having to wait in common areas in the institution where they work. BOP also provides some additional support services to staff, which we will discuss later in this report.

¹⁸See 5 C.F.R. §§ 337.204, 337.205.

Figure 3: Process by which Bureau of Prisons' (BOP) Employees and Their Families Can Access Employee Assistance Program Resources



Source: GAO analysis of BOP Information. | GAO-21-123

BOP's Methods for Assessing Staffing Levels Are Not Reliable, and BOP Lacks a Plan for Identifying and Addressing Staffing Challenges

BOP has multiple methods for assessing its staffing levels to determine staffing shortages, but we found that these methods have limitations and do not yield reliable information. For two methods, BOP was unable to provide supporting documentation, and for the third, a BOP official stated that the method did not account for different institution characteristics. We also found that BOP has multiple data sources available to help it identify and address the causes and potential impacts of staffing challenges, but it is not leveraging them and lacks a plan to do so.

BOP's Three Methods for Assessing Staffing Levels Do Not Provide Reliable Information

According to BOP officials, BOP assesses its staffing levels, including identifying the extent of staffing shortfalls, through three methods—(1) comparing data on filled and authorized positions, (2) utilizing staffing guidelines to compute the amount of required staff, and (3) utilizing data on inmate-to-staff ratios. Each method contains inconsistencies in either terminology or methodology and we found reliability concerns with the methods and data used.

BOP Compares Filled and Authorized Positions. In January 2020, BOP Human Resource Management Division officials told us that they assess staffing levels at BOP institutions by comparing “filled” positions against “authorized” positions. According to BOP officials, filled positions reflect the number of staff onboard at any given time, and authorized positions reflect positions allocated by Congress.

The Human Resource Management Division maintains a detailed dataset on each BOP institution location; the positions at each institution, including descriptions of the corresponding job series and job series codes; and, the number of filled and authorized positions.¹⁹ This dataset contains such information for 108 locations, including BOP institutions, two staff training centers, BOP’s central office, the Grand Prairie Office Complex, and individual regional office locations. Across these 108 locations, BOP identifies a total of 157 unique job series, such as Maintenance Mechanic, Chaplain, and Correctional Officer.

According to officials, BOP considers any gap between the number of filled and the number of authorized positions to be its staffing shortfall. BOP officials told us that, ideally, the number of filled positions would equal the number of authorized positions for a full staffing complement, but that there have been substantial gaps between authorized and filled positions over time.

However, in reviewing BOP’s data on authorized positions from fiscal years 2015 through March 2020, and in interviewing BOP officials, we identified a number of limitations that affect the reliability of this method for assessing staffing levels. Namely, BOP could not provide documentation or clearly explain how it determines the number of authorized positions for each series, though officials did acknowledge that the number of authorized positions could change over time. BOP officials also told us they calculate the number of authorized positions when an institution is activated, but that it generally does not revisit or revise this

¹⁹In its source documentation, BOP refers to these positions as “series” and “series descriptions,” and not positions. OPM defines series as a subdivision of an occupational group or job family consisting of positions similar as to specialized line of work and qualification requirements. OPM’s definition continues, stating that series are designated by a title and number such as the Accounting Series, 0510; the Secretary Series, 0318; the Microbiology Series, 0403.

number again.²⁰ BOP officials could not provide a rationale for why they did not revisit this analysis over time.

Further, according to DOJ budget officials, in 2017, BOP eliminated 5,100 authorized positions from its FY2018 budget request to more closely align its authorized positions with the actual BOP workforce following a recommendation from DOJ budget officials. While this appeared to close the gap between filled and authorized positions, because the authorized positions had not previously been funded, there was no practical change in the staffing levels at BOP institutions. Moreover, BOP undertook this effort in an ad hoc way. For example, BOP officials told us they eliminated whichever positions were vacant at the time rather than identifying positions for elimination by analyzing current workforce needs. As a result of BOP's inability to clearly explain how it determines the number of authorized positions for each series, and the ad hoc removal of vacant positions, this method is unreliable for determining staffing shortfalls.

BOP Utilizes Staffing Guidelines. BOP officials also told us that they have developed staffing guidelines, and that these guidelines are the method they use to determine appropriate staffing levels. Specifically, these guidelines provide information on essential posts and factors to consider in assigning staff for BOP institutions, though BOP officials said that they are not binding.

In 2012, we reported that BOP had developed minimum staffing guidelines, partly in response to an August 2010 DOJ study of BOP's staffing.²¹ In January 2020, BOP officials stated that BOP institutions were in various stages of implementing these guidelines.

Based on our analysis of BOP's Correctional Services Staffing Guidelines in particular, the guidelines list various formulas to compute the amount of custody staff that would be required for different types of institutions.²² For example, the guidelines list that one particular post would be required on morning, day, and evening shifts at low security, medium security, and

²⁰Activation is the overall process by which BOP staffs and equips institutions and then populates them with inmates.

²¹[GAO-12-743](#).

²²BOP refers to certain staff as "custodial" because they are responsible for the correctional treatment, custody, and supervision of inmates. Non-custodial staff include those who work in the kitchen, as well as nurses, vocational and educational training staff, and psychologists.

high security level institutions. However, the position titles contained within the staffing guidelines are not aligned with the position titles in BOP's other dataset on authorized and filled positions (referred to as "series"). Additionally, BOP officials were not able to describe or provide documentation on how the staffing guideline formulas are applied at each BOP institution and how, if at all, these positions align with BOP's list of authorized position series. BOP officials also stated that the positions identified in the staffing guidelines are not always filled due to lack of funding. As a result of these inconsistencies in terminology and the absence of supporting documentation to link BOP's staffing guidelines to the authorized and filled dataset, this method is unreliable for determining staffing shortfalls.

BOP Utilizes Inmate-to-Staff Ratios. BOP officials told us that they also track staffing levels by monitoring its inmate-to-staff ratio. We reviewed the dataset containing the staffing numbers to calculate this ratio, as of March 2020. It contains the inmate population, as well as the total number of correctional officers on board; the total number of all others on board (i.e., non-correctional officers); and the total number of staff, which is the correctional officers plus all others. These data elements are available for all BOP institutions, and there are calculations for each institution to determine the inmate-to-correctional officer ratio, the inmate to other onboard ratio and the inmate to total onboard ratio. However, when we asked a BOP Correctional Programs Division official about how the ratios could be used to determine appropriate staffing levels agency-wide, he told us they could not be.²³ Specifically, he said that each institution is unique with regards to its age, layout, infrastructure, and security level and the inmate-to-staff ratio does not account for these variations. As a result of the inmate-to-staff ratio not accounting for unique institution factors, inmate-to-staff ratios alone would not be a reliable method for determining overall staffing shortages.

Standards for Internal Control in the Federal Government call for agencies to use quality information that is, among other things, current, accurate, accessible, and provided on a timely basis. These standards call for an agency's management team to obtain relevant data from reliable sources, process it into quality information, and utilize it to make informed decisions. BOP's current methods limit its ability to process data into quality information to inform its staffing decisions. Developing and

²³BOP's Correctional Programs Division provides national policy direction and daily operational oversight of institution correctional services.

implementing a reliable method for calculating staffing levels, or amending existing methods, would provide BOP with a more accurate picture of the extent of any staffing shortfalls, when such shortfalls began, at which institutions those shortfalls exist, and which positions and series are affected. Further, having a reliable method for calculating staffing levels would better position BOP to take corrective action to address any staffing shortfalls, as needed.

BOP Has Not Leveraged Available Data to Help Identify and Address the Causes and Potential Impacts of Staffing Challenges

BOP officials shared several perspectives on BOP's staffing challenges and BOP has several data sources available that capture employee feedback. However, BOP has not leveraged these data to better understand the potential causes and impacts of such challenges.

BOP Officials Offered Perspectives on Staffing Challenges

Geographic locations of BOP institutions. In eight interviews with different BOP officials, as well as in materials that BOP sent to OPM for assistance in addressing its staffing challenges, BOP officials stated that certain institutions are located in areas of the country that make hiring a challenge. Examples of challenges they reported facing include difficulty attracting candidates to remote locations, competing with alternative employers in locations with stronger labor markets, and offering competitive pay for locations with high costs of living. BOP has done some analysis to support this rationale, including identifying potential competitor organizations for the applicant pool and showcasing gaps in BOP's pay compared to state-level averages. However, BOP's analysis is not always specific to the immediate vicinity of the institution, and further, in BOP's requests for special salary rates, BOP has not provided evidence that any pay disparities are the cause of staffing shortages. Such analyses could help position BOP to identify, confirm or address these as factors contributing to staffing challenges.

Hiring Process Delays. Additionally, BOP officials stated that delays in the hiring process, due in part to staffing shortages among its own internal Human Resource Management Division staff, have also contributed to its reported staffing shortfalls. For example, because it takes so long to hire a candidate, the candidate might withdraw his or her application and take a different job that becomes available before the candidate is able to complete the BOP hiring process. BOP compiles a

report every quarter to track the average time to hire.²⁴ These reports include the average total duration of days needed to hire someone, but do not, for instance, identify specific points in the process where delays occur, why those delays are occurring, or identify corrective actions for addressing the delays. The report also does not identify a specific goal or benchmark for hiring process durations—all of which could help BOP establish whether delays in hiring are contributing to staffing challenges, and identify ways to address them. Based on our analysis of BOP’s data, we found that BOP’s time-to-hire has ranged from an average of 82 days (in fiscal year 2016) to an average of 96 days (in fiscal year 2017) from fiscal years 2015 through 2020. In fiscal year 2020, BOP’s average time-to-hire was 91 days.

Hiring Freeze. BOP also told us that a hiring freeze that was instituted in January 2017 was a major cause of its reported staffing shortfalls because they were not permitted to hire.²⁵ However, DOJ guidance authorized BOP institutions to fill any position to replace attrition in order to maintain staffing at pre-hiring freeze levels.²⁶ Despite this, six months into the hiring freeze, BOP staffing levels had declined by approximately 1,064 positions following staff departures. The majority of these positions were located at BOP institutions (rather than BOP central office) and thus eligible to be filled. According to DOJ budget officials, the hiring freeze never represented a practical barrier to BOP hiring.

When we asked BOP officials why they did not hire to replace attrition during the hiring freeze as DOJ permitted, BOP officials stated that BOP’s

²⁴BOP calculates time to hire as the number of days between the job announcement posting and the employee’s entry-on-duty date.

²⁵In January 2017, OMB announced a hiring freeze for all Executive Branch agencies. In April 2017, OMB lifted the hiring freeze. However, the Attorney General kept the hiring freeze in place after April for most of DOJ, with some exceptions. According to DOJ budget officials, BOP institutions were permitted since February 2017 to replace attrition by filling any vacancies that occurred after the implementation of the hiring freeze. See OMB, *Immediate Actions and Initial Guidance for Federal Civilian Hiring Freeze*, Memorandum M-17-17 (Washington, D.C.: January 25, 2017); *Federal Civilian Hiring Freeze Guidance*, Memorandum M-17-18 (January 31, 2017); *Comprehensive Plan for Reforming the Federal Government and Reducing the Civilian Workforce*, Memorandum M-17-22 (April 12, 2017). The former two memoranda established and provided guidance on the government-wide hiring freeze, respectively, while the final memorandum lifted the hiring freeze.

²⁶DOJ, Assistant Attorney General for Administration, *Implementation of Departmental Hiring Freeze*, Memorandum for Heads of Department Components and United States Attorneys (Washington, D.C.: February 24, 2017).

acting director had issued guidance specifying that BOP should not backfill these positions. BOP and DOJ budget officials also told us that BOP exercised caution in its hiring due to potential future budget adjustments on account of a reduced inmate population. Therefore, BOP did not hire to keep pace with staff attrition in 2017 and 2018. However, they also stated that BOP has since placed a renewed emphasis on hiring and that BOP has hired more than 1,000 positions in 2020.²⁷

Position Eliminations. As discussed earlier, BOP eliminated 5,100 authorized positions in its fiscal year 2018 budget request after DOJ's budget office recommended that they do so. BOP officials stated that the elimination of these positions in 2018 has had long-lasting effects; however as noted, these positions had been unfunded for more than a decade and actual staffing levels were not affected, as these positions were not staffed when eliminated.

In addition to perspectives on the causes of staffing shortfalls, BOP officials and other outside stakeholders noted several examples of their impacts. For example, staff and BOP union officials noted that shortages affected institution safety, inmate access to programming, and the manageability of staff workloads. Additionally, institution staff we interviewed stated that staffing shortfalls result in excessive overtime usage and a shortage of staff available for inmate programming such as drug treatment and education programs. Based on our review of 85 interviews that we conducted with staff working in BOP institutions during recent, related BOP audits, we found that staffing shortages were mentioned in more than half as a challenge to BOP's operations.

Regarding the impact of staffing shortages on inmates, specifically, BOP officials and outside experts provided several examples of how potentially insufficient staffing may impact inmates in BOP custody. Officials in three of BOP's six regional offices emphasized that augmentation can affect inmate programming, including the possibility that all programming for a day may be canceled. Outside stakeholders, including representatives of current and former inmates, stated that insufficient staffing is connected to an increase in the number of violent incidents that occur within an institution, and union officials agreed that reductions in authorized positions led to an increase in violence. BOP officials and outside stakeholders alike acknowledged that insufficient staffing can reduce inmate access to medical care, and outside stakeholders also reported

²⁷As of March 2020.

BOP Does Not Leverage Data on Causes and Impacts of Staffing Challenges

that inmates already face reduced access to dental care. Further, an outside stakeholder reported that when there is insufficient staffing, inmates may not receive mail, meals, or visitors in a timely fashion. One group of stakeholders we interviewed stated that in institutions with insufficient staff, inmates are more likely to be placed in restrictive housing, sometimes referred to as solitary confinement. Prior DOJ OIG reports have also stated that insufficient staff can result in reduced medical access for some inmates, as well as reduced availability of training on best practices for managing special inmate communities, such as female inmates.²⁸

BOP collects and maintains multiple sources of data that provide feedback from staff on their jobs and reasons for leaving BOP. This feedback may reflect additional or different causes and impacts of staffing challenges discussed earlier. However, BOP has not analyzed this data specifically to identify the agency-wide causes or potential impacts of any reported staffing challenges. Examples of available data that BOP is not currently leveraging include (1) BOP exit survey data, (2) annual prison climate survey data, and (3) Federal Employee Viewpoint Survey (FEVS) data.

BOP exit survey data. According to the exit survey that BOP administers to departing employees, the exit survey is a tool used in human capital management to help pinpoint organizational issues that may negatively affect BOP's ability to recruit and retain employees. The exit survey contains several closed-ended questions, as well as an area for free response where staff may offer insights into why they are separating from BOP and challenges they may have faced while employed.

For example, BOP's executive level summary of 2018 exit survey responses grouped the responses by voluntary retirees and non-retirees.²⁹ For example, among the 348 non-retirees who responded to the survey, BOP found that:

- 63 percent reported their pay level was an important factor;

²⁸Department of Justice Office of the Inspector General, *Review of the Federal Bureau of Prisons' Medical Staffing Challenges*, (March 2016), and, *Review of the Federal Bureau of Prisons' Management of Its Female Inmate Population*, (September 2018).

²⁹The 2018 exit survey report was the most recent available at the time of our audit work.

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- 55 percent reported insufficient resources to perform their job properly was an important factor;
 - 51 percent reported that access to developmental opportunities was an important factor in deciding to leave their current position at BOP; and
 - 49 percent reported that job-related stress was an important factor.

BOP officials told us that exit survey data are better suited for a snapshot (i.e., a single point in time), and that the surveys are voluntary and have a low response rate. BOP officials also told us that they do not think it would be judicious to make policy decisions based on what they characterized as a minority of responses to the exit survey. However, BOP officials did not have a baseline for what they consider an acceptable response rate. Based on our analysis of BOP's exit survey reports, BOP's response rate has been approximately 40 percent between 2015 and 2018. In addition, BOP possesses other data sources to provide further context and information.

Further, our analysis of 2018 BOP exit survey written responses showed that 12 percent of separating employees who completed the survey specifically mentioned staffing-related challenges as a contributing factor for their separation. For example, one respondent said they would have stayed if there were more staff, and that the low staffing levels were creating a very dangerous environment.

However, BOP has not leveraged these data in order to help determine the causes and potential impacts of its reported staffing challenges. For example, the 2018 executive level summary of the survey did not propose solutions to reported challenges, or describe any further analysis to better understand the significance of staff perspectives, such as studying pay rates for potentially competitive jobs in BOP markets. BOP officials responsible for overseeing the survey told us that while they provide the exit survey data to institutions, they do not track or analyze how, if at all, institutions make use of this information.

Annual Prison Social Climate Survey. BOP's Prison Social Climate Survey provides BOP management with information for monitoring operations, morale, communication and treatment in the workplace. The survey also notes the importance of employees conveying to management the extent to which they believe BOP is accomplishing its goals. Based on our analysis of the 2015 through 2018 Prison Social Climate Survey instrument, there are several questions on the survey that

could provide data on the potential impacts of staffing challenges, such as a current employee's satisfaction and potential for leaving the agency.³⁰ Such questions ask, for example:

- Whether respondents feel emotionally drained at the end of the workday.
- Whether respondents feel overwhelmed by the amount of work they are assigned.

However, similar to the exit survey data, BOP has not done an agency-wide analysis of Prison Social Climate Survey results to improve its understanding or determine the causes and impacts of its reported staffing challenges, such as whether there are common concerns among the workforce that are shared across multiple BOP institutions. Instead, BOP Human Resource Management Division officials provide aggregated responses from the survey to individual institutions, where institution wardens would be responsible for related hiring or other staffing actions, such as augmentation, to ensure institutions are run safely without negatively affecting inmate programs.

Annual Federal Employee Viewpoint Surveys. OPM's FEVS serves as a tool for employees to share their perspectives in many critical areas, including their work experiences, their agency, and leadership, on an annual basis. The survey measures employees' perceptions of whether and to what extent conditions characterizing successful organizations are present in their agency. Such survey data could provide BOP management with insight into areas where improvements have been made, as well as areas where improvements are needed.

According to BOP officials, the bureau develops a biennial action plan based on its analysis of FEVS scores. BOP's 2018 action plan—the most recent plan available at the time of our review—contains eight actions to be taken addressing employee engagement.³¹ However, we found that none of the eight actions are related to improving issues related to insufficient resources and unreasonable workloads—both areas within FEVS in which employees reported concerns.

³⁰BOP officials told us that they did not administer the survey in 2019, and they have not determined when or if they will administer it again in the future.

³¹OPM defines employee engagement as the employee's sense of purpose that is evident in their display of dedication, persistence, and effort in their work or overall attachment to their organization and its mission.

Standards for Internal Control in the Federal Government state that management should process data into quality information, and use the information to make informed decisions and to evaluate its performance in achieving key objectives and addressing risks. Additionally, OPM encourages agencies to utilize personnel data, such as turnover rates, in conjunction with other data sources—such as FEVS—to shed light on employee perceptions within an agency.³² OPM also suggests other tools such as focus groups could help agencies more fully understand why employees responded to the OPM FEVS questions as they did.

Developing and implementing a plan for analyzing data to help identify and address the causes and potential impacts of staffing challenges on staff and inmates would help BOP to understand the challenges staff face, the reasons why BOP may be losing staff, and related challenges attrition causes those who remain onboard. If BOP found that available data are insufficient, its plan could include the collection of new data sources, as appropriate. Such a plan could seek to substantiate the explanations BOP has previously reported by providing supporting analyses, or it could leverage survey data to analyze employee perspectives about their jobs and reasons for leaving BOP.

BOP Has Practices for Addressing Staffing Challenges, But Has Not Adequately Assessed Risks, Measured Outcomes, or Assessed Prior Study Results

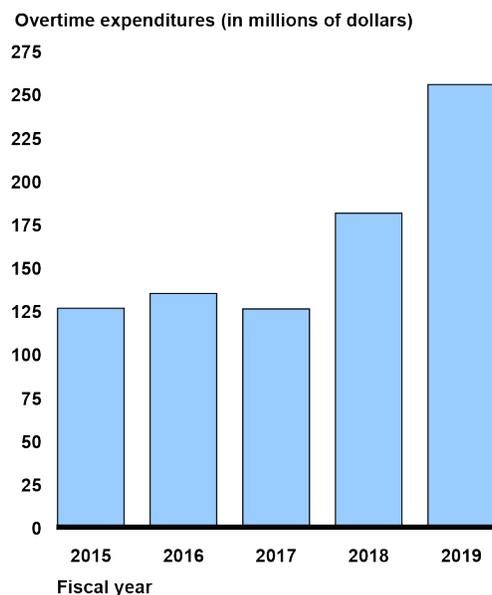
BOP has multiple practices in place to address its staffing challenges, such as using overtime and augmentation, and incentivizing employees—for example, by paying them more to relocate. However, BOP has not assessed the risks associated with its growing use of overtime and augmentation. In addition, BOP has not fully measured or assessed outcomes for its incentive programs to determine if they are working as intended.

³²Office of Personnel Management. Federal Employee Viewpoint Survey: *Understanding Results*. Undated. Accessed November 28, 2020. <https://www.opm.gov/fevs/reports/understanding-results/>

BOP Has Not Assessed Risks Associated with its Growing Use of Overtime and Augmentation

BOP's use of overtime and augmentation has increased since 2015, but BOP has not assessed the risks associated with its growing use. According to our analysis, BOP spent about \$824 million from fiscal years 2015 through 2019 on overtime.³³ In that same period, overtime expenditures across all BOP institutions increased 102 percent, from about \$126 million in fiscal year 2015 to about \$255 million in fiscal year 2019, as shown in figure 4. A BOP official stated that, in general, staffing shortages can lead to increases in overtime, and that the previously discussed 2017 hiring freeze and 2018 reduction in authorized positions help explain the increase in overtime from fiscal year 2015 to fiscal year 2019.

Figure 4: Overtime Expenditures at Bureau of Prisons (BOP) Institutions from Fiscal Years 2015 through 2019



Source: GAO analysis of BOP Data. | GAO-21-123

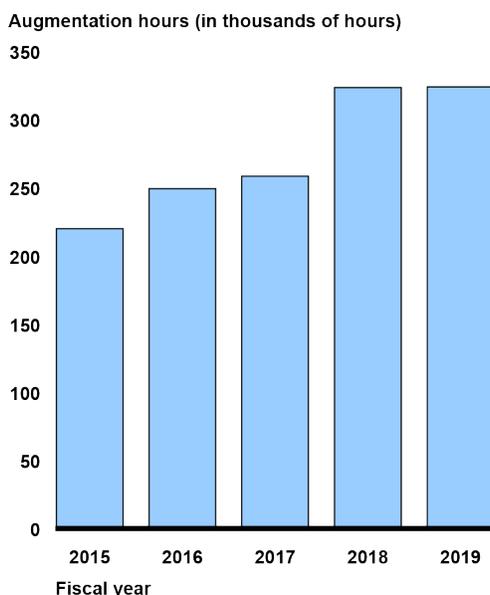
Note: Data are expenditures in nominal dollars, and have not been adjusted for inflation.

In addition, we found that BOP's use of augmentation across all BOP institutions has increased 47 percent from fiscal years 2015 through 2019, as shown in figure 5. Our analysis also showed that five out of

³³BOP's overtime costs include several categories, such as overtime charged by institution staff filling correctional officer posts and overtime charged by staff transporting inmates to or from hospitals or other medical facilities, as well as the supervision staff provide while inmates receive care there, among others.

BOP's six regions had an increase in augmentation usage during this same period and two of the six regions had an increase exceeding 100 percent.

Figure 5: Augmentation Hours at Bureau of Prisons (BOP) Institutions from Fiscal Years 2015 through 2019^a



Source: GAO analysis of BOP Data. | GAO-21-123

^aAugmentation is the assignment of a non-custody staff member, e.g., an individual responsible for educational or vocational training, to a custody role, whereby the staff member's primary task becomes the custody and supervision of the inmate.

According to BOP union representatives, overtime and augmentation are necessary practices because operating prisons is a 24-hour a day, 7-day a week obligation. Further, a BOP official responsible for correctional programs told us that when some staff take vacation, call out sick, or are engaged in training courses, for example, BOP must cover the shifts by relying on other staff to fill the posts. Despite the year-over-year increase in its use of each practice, BOP has not conducted a risk assessment to determine the impacts on staff and inmates, especially with regard to the safety of its institutions. For example, BOP has not analyzed whether there is correlation between incidents of violence or other misconduct in the prison, including whether staff working those shifts may have been working longer than normal hours, or may have been augmented from the roles in which they most typically serve. Relatedly, BOP has also not

established accepted risk tolerance levels, even though officials stated that augmentation and overtime are necessary but not ideal.

A researcher we spoke with, who has studied the mental health effects of working in corrections, told us that working overtime often causes officer sleep deprivation, making the officer more irritable and aloof, and may even cause physical health problems as well. Further, BOP union officials we interviewed characterized the growing use of overtime as abusive, and explained that overtime can present risks to officers' and inmates' safety. For example, union officials stated that BOP staff can be mandated to work overtime, especially when it is for double shifts or on multiple occasions. These union officials stated how important officers' observation skills are when working in a prison environment, and that, when tired from overtime, it can be difficult for officers to maintain keen observation skills. Our interviews with BOP staff from prior reviews dating back to 2016 also provide insight about their perspectives on working overtime. One BOP staff member said that mandated overtime makes it dangerous to be in inmate housing units, and another staff member said that low staff levels limit staff training opportunities.

BOP officials told us that they have not assessed the risks associated with their growing use of overtime and augmentation primarily because they leave it to wardens at the individual institutions to justify their needs to the regional offices for when they feel overtime and augmentation are warranted practices. Officials from multiple regional offices told us that the central office sets a threshold for overtime expenses that is generally 2 percent of the region's total salaries and expenses budget. The regional offices then determine the level of overtime expenses for each of their institutions. In the event an institution exceeds their individual overtime threshold, the institution warden can submit paperwork to the regional office explaining the need for a realignment of funds. A BOP headquarters official told us that institutions often have justifications for why overtime was being used more heavily than usual, and that as long as the regions are staying within allotted funding, then BOP does not take any specific corrective actions regarding high overtime expenses.

However, concerns about the growing use of overtime and augmentation and the risks this poses to the security of staff, inmates, and the institutions are longstanding. For example, in 2016, BOP's then-Acting Director issued a memorandum addressing augmentation, which BOP told us is the most recent executive-level guidance on the topic. According to the memorandum, BOP "has faced tight budgets and relative reductions in staffing over the past many years" and "increasingly

wardens have had to rely on augmentation along with overtime to fill critical custody posts.”³⁴ Further, the memorandum directed institutions to ensure that augmentation is used only as a last resort and in consideration of the workloads of non-custody staff. The memorandum also stated that augmenting custody staff with non-custody staff interferes with reentry and other important work these staff perform and that they are unable to complete their regularly assigned duties when they are working correctional officer posts.³⁵

Standards for Internal Control in the Federal Government state the importance of agencies defining their objective with any activity or program, and identifying risks; establishing risk tolerances (that is, an acceptable level of variation); and responding to risks appropriately.³⁶ The standards state that agencies should identify, analyze and respond to significant changes that could impact the internal control system. Such changes could include internal changes to an organization’s programs, activities, personnel—or, in the case of BOP, its increasing use of overtime and augmentation in the last several years. According to the standards, changes often prompt new risks, or changes to existing risks, that need to be assessed, and management should carry out a risk assessment to identify, analyze and respond to such risks.

One of BOP’s primary objectives is to ensure the safety and security of its inmates and staff, and it is at risk of being unable to do that when it is not adequately staffed. However, using overtime and augmentation—and doing so increasingly over time—as a means to address reported staffing challenges has its own risks to BOP’s staff and inmates, as well as the safety of its institutions, that BOP has not thoroughly assessed. Assessing the risks of its growing reliance on overtime and augmentation could help position BOP to determine what changes, if any, are needed to its current approach to institutions’ use or oversight of overtime and augmentation. Conducting a risk assessment of its overtime and augmentation use would better position BOP to identify the potential risks

³⁴Thomas Kane, Acting BOP Director, U.S. Department of Justice. Memorandum for all Chief Executive Officers. *Re: Augmentation*, Washington, D.C., June 1, 2016.

³⁵Thomas Kane, Acting BOP Director, U.S. Department of Justice. Memorandum for all Chief Executive Officers. *Re: Augmentation*, Washington, D.C., June 1, 2016.

³⁶GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014). Internal control is a process effected by an entity’s management, oversight body, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved.

these methods pose to staff, inmates, and institution security and respond, as appropriate.

BOP Has Not Fully Assessed Outcomes for Its Incentive Programs to Determine If They Are Working As Intended

From fiscal year 2015 to July 2020, BOP spent about \$137 million in recruitment, retention, relocation, and other related incentives for BOP employees.³⁷ However, BOP has not fully assessed the outcomes of its recruitment, relocation, and other incentives to determine if the programs are working as intended. BOP conducted an assessment in 2019 on retention incentives that found limited benefit from this program; however, officials have continued the program citing summary statistics from employee exit surveys regarding the potential benefits of retention incentives.

Recruitment incentives. According to BOP documentation, each recruitment incentive is based on a written case-by-case determination that the candidate is highly qualified to perform the duties of the position, and that BOP would have considerable difficulty in filling the position with a high quality candidate if a recruitment bonus were not paid. BOP offered 1,011 recruitment incentives in calendar year 2019 and 936 accepted BOP's offer.³⁸ BOP spent approximately \$4.3 million on recruitment incentives in fiscal year 2019, and a total of approximately \$17.7 million from fiscal year 2015 to July 2020.

Relocation incentives. A relocation incentive may be offered to current BOP employees who meet certain criteria and are willing to relocate to accept a hard-to-fill position in a hard-to-fill location based on a determination that, absent an incentive, it would be difficult to fill the position. BOP offered 311 relocation incentives in calendar year 2019 and 249 accepted BOP's offer. BOP spent approximately \$850,000 on relocation incentives in fiscal year 2019, and a total of \$5.5 million from fiscal year 2015 to July 2020.

Retention incentives. Retention incentives may be paid if an employee's unusually high or unique qualifications or BOP's special need for the employee's services makes it essential to retain the employee, and if the employee would likely leave BOP absent a retention incentive. BOP

³⁷In addition, in September 2019, BOP entered into a one year, \$3.7 million contract to improve its branding and to "generate greater awareness and engagement with potential job candidates." According to BOP, the contractor is scheduled to provide its final report in December 2020 on the success of the branding and marketing goals.

³⁸BOP provided data on the quantity of incentives by calendar year, but incentive dollar amount data by fiscal year.

offered 5,011 retention incentives at institutions in calendar year 2019 and 4,617 accepted BOP's offer. BOP spent approximately \$22 million on retention incentives in fiscal year 2019, and a total of approximately \$115 million from fiscal year 2015 to July 2020.

Other incentives. In addition to the three incentive types discussed above, BOP may repay federally-insured student loans to attract job candidates or retain current employees. BOP reported that they spent approximately \$2.1 million on federally-insured student loan payments for 226 BOP employees in calendar year 2019. Additionally, having received OPM's approval to do so, BOP has established higher rates of pay for some specialist positions, such as physicians and psychologists, as well as allowances for certain eligible physicians or dental professionals who enter into service agreements. In fiscal year 2019, BOP applied these special salary rates to approximately 1,200 BOP employees. The 1,200 employees accounted for 25 positions across 95 BOP institutions, and all positions were in the medical services field, such as physicians, nurses, and dentists.

While BOP has made use of the above incentives, we found that it has not established performance measures or goals for ensuring these efforts, and these investments of funds, are effective. For example, based on our analysis of BOP documents—including its 2019 Strategic Plan, 2020 Human Capital Operating Plan, and the 2019 DOJ Annual Performance Report—we did not find documentation of such performance measures. BOP officials did not provide a rationale for why they had not developed such measures to measure the effectiveness of these efforts.

Regarding retention incentives, in particular, BOP conducted a study using retention incentive data available through early 2018. BOP conducted this study in response to a recommendation we made in our December 2017 report that BOP evaluate its retention incentives to determine if they helped BOP achieve its human capital goals.³⁹ BOP concurred, and in a 2019 report on its study, BOP stated that other than for medical employees, BOP found no evidence that employees are any less likely to resign when they have a retention incentive. For medical employees, BOP concluded that employees may be modestly less likely to quit if they receive a retention incentive, with quitting chances reduced by 1.4 percent for each 1 percent of extra salary paid. In May 2019, BOP

³⁹[GAO-18-147](#).

officials stated that they would plan to revisit the use of incentives annually and when BOP reached a staffing level of approximately 95 percent of its authorized levels. Based on BOP's completion of the evaluation, we determined that these actions met the intent of the recommendation from our 2017 report.

However, BOP officials told us that they planned to continue using retention incentives despite the evaluation's findings. In particular, BOP officials said this was because summary statistics from BOP's annual exit surveys indicate that most staff departing BOP reported that low pay in relation to job responsibilities was a key factor for their departure. As of July 2020, BOP has spent nearly \$52 million on retention incentives since the study was completed, but has not conducted any further assessments to determine whether the use of retention incentives is working as intended.⁴⁰

The Government Performance and Results Act of 1993 (GPRA), as updated and expanded by the GPRA Modernization Act of 2010 (GPRAMA), directs agencies to develop and document goals, as well as performance measures to assess progress towards their goals.⁴¹ In the context of BOP's staffing incentives, performance measures could include, for example, a designated percentage improvement in attrition rates based on retention or relocation incentives offered, or a return on investment calculation for paying retention incentives, when compared to the cost of hiring new employees. Without performance measures and goals in place to assess the outcomes of its staffing incentives, BOP cannot gauge whether the incentives are working as intended and whether or not the resources it is expending is an effective use of funds.

⁴⁰This includes BOP's amount spent on retention incentives from fiscal year 2019 to July 2020.

⁴¹Government Performance and Results Act of 1993 (GPRA), Pub. L. No. 103-62, 107 Stat. 285 (1993); GPRA Modernization Act of 2010, Pub. L. No. 111-352, 124 Stat. 3866 (2011). Note that GPRA, as amended and expanded by GPRAMA, creates a framework for articulating unified goals and outcome measures that can provide federal agencies with a clear direction for successful implementation of activities and improve the efficiency and accountability of agencies' efforts. Goals explain the purpose and intended results that a program seeks to achieve in its work. Outcome measures that are linked to goals allow a program to track the progress it is making toward achieving its goals. While GPRA and GPRAMA apply to the department or agency level, we have previously reported that their provisions can serve as leading practices at other organizational levels, such as component agencies, offices, programs, and projects.

Further, according to *Standards for Internal Control in the Federal Government*, management should evaluate issues identified through monitoring activities, determine appropriate corrective actions for deficiencies, and remediate the deficiency in a timely manner.⁴² Assessing the outcomes of its staffing incentives by developing and implementing performance measures and goals as benchmarks—or adjusting efforts, as appropriate, when performance goals are not met—would better position BOP to determine program effectiveness.

⁴²[GAO-14-704G](#).

Some Studies Suggest Negative Mental Health Effects for Corrections Staff; BOP Could Improve Data Collection on Mental Health Programs

Some Studies Suggest that Corrections Staff Have Higher Rates of Stress and Post-traumatic Stress Disorder

Our review of selected literature indicates that staff working in a corrections environment may experience higher rates of mental health issues. Specifically, we reviewed multiple, independent research studies that DOJ's National Institute of Corrections identified when conducting a literature review to examine potential links between corrections work and stress.⁴³ For example, a 2011 study found that among almost 200 correctional officers who provided health information, 31 percent of male and 25.8 percent of female correctional officers reported they were hypertensive.⁴⁴ This is substantially more than the rate of hypertension among similarly aged adults in the U.S. (19.1 percent for males and 15.5 percent for females).⁴⁵ In another study of corrections professionals in 2012, 956 out of 3,599 who responded to the survey reported they

⁴³The National Institute of Corrections is an agency within BOP that provides training, technical assistance, information services, and policy assistance to federal, state, and local corrections agencies.

⁴⁴Tim Morse et al., "Talking about Health: Correction Employees' Assessments of Obstacles to Healthy Living." *Journal of Occupational and Environmental Medicine*, vol. 53, no. 9 (2011): pp. 1037–45. This survey was administered to all (896) correctional officers at two corrections facilities in the Northeast. While the study is not generalizable to all correctional officers, the study analyzes health information from 197 officers at those facilities.

⁴⁵National Center for Health Statistics. Health, United States, 2013: With Special Feature on Prescription Drugs. Washington, DC: US Government Printing Office; 2014. p. 231. We compared the data in the 2011 study to National Center for Health Statistics data for males and females aged 35-44, because the mean age of the respondents was 42.4 and fell within that range. We used data from 2009-2012 as that most aligned with the time period of the study.

suffered from post-traumatic stress disorder.⁴⁶ The corrections professionals who suffered from this disorder also cited higher levels of memory impairment, depression, sleep difficulty, obesity and skin conditions than those that did not suffer from it.

In a literature review from 2013, one researcher concluded that, while some correctional agencies may provide counseling programs that will treat general mental health concerns, it is difficult for institutions to find confidential treatment providers familiar with working in corrections.⁴⁷ The researcher pointed out that, often, general mental health providers are not aware of options specific to working in the field of corrections, such as the benefits of psychological debriefings and knowledge of the various job-specific individual and family issues.

Further, a researcher on the mental health effects of working in corrections that we interviewed shared that based on observations and related work, the stress of working in a correctional environment can lead to sleep deprivation, job stress, and decreased job functionality. BOP union officials with whom we spoke corroborated these accounts and stated that when staff are mandated to work double shifts, they become exhausted and their observation skills are decreased.

BOP Offers Some Services to Enhance Staff Mental Health, but Could Improve the Data and Feedback it Collects to Enhance Its Employee Assistance Program

BOP offers some services to enhance staff mental health, such as Crisis Support Teams and an Employee Assistance Program. However, we found multiple errors in the data BOP collects for its Employee Assistance Program. We also found additional opportunities for BOP to collect feedback from correctional staff on the program as the Bureau proceeds with plans to improve it.

Crisis Support Teams. BOP has established a structure for its Crisis Support Teams, which are peer-based teams of BOP employees that

⁴⁶Caterina Spinaris, Michael Denhof, and Julie Kellaway, *Post-traumatic Stress Disorder in United States Corrections Professionals: Prevalence and Impact on Health and Functioning* (Florence, CO: Desert Waters Correctional Outreach, 2012). Although this study was not administered to a representative sample, it analyzes responses from a large number of corrections professionals, which the study's authors state allowed for representation across gender, age, job roles, professional settings, security levels, and a variety of U.S. states and territories. The presence of this disorder among corrections professionals was determined using a post-traumatic stress disorder screening assessment.

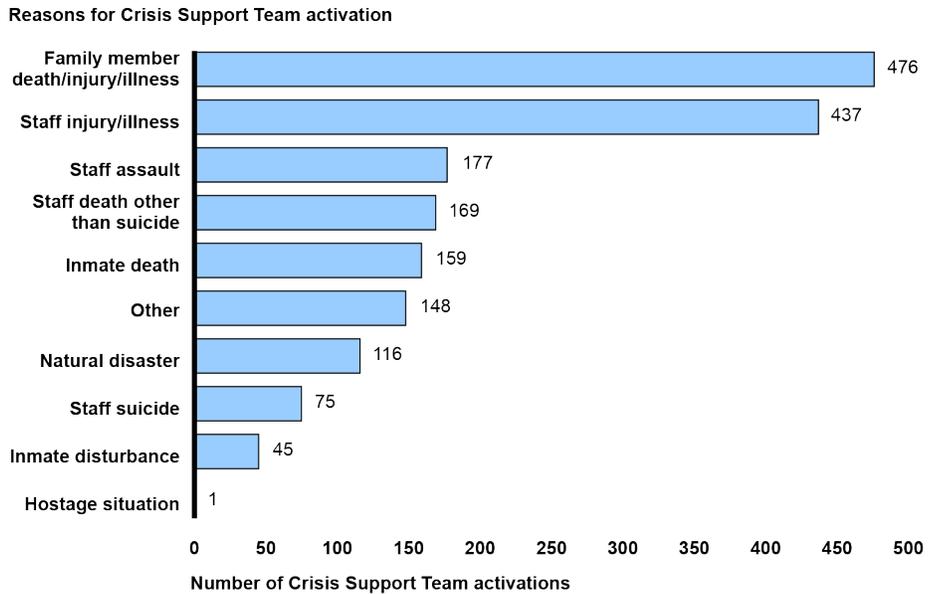
⁴⁷Department of Justice, Office of Justice Programs Diagnostic Center and Jaime Brower, *Correctional Officer Wellness and Safety Literature Review* (Washington, D.C.: July 2013).

provide support to other employees in response to critical incidents, including staff injury or suicide. Crisis Support Teams can also be activated, for example, in response to natural or man-made disasters, national emergencies, or a hostage situation. Crisis Support Teams have, at minimum, the following positions: a team leader, a family support assistant team leader, an on-scene support assistant team leader, a psychologist, a chaplain, administrative support, and a Bureau Battle Buddy liaison.⁴⁸ Crisis Support Teams can provide information to staff about the availability of Employee Assistance Program resources and make referrals to a BOP psychologist. For example, if a staff member is seriously assaulted and requires outside medical care, a Crisis Support Team leader is to assign one or more members to meet with the staff member to provide support. The team member typically checks in with the staff member again one month after the incident and is to refer them to the Crisis Support Team psychologist, if necessary.

According to BOP data, there were 1,803 Crisis Support Team activations at BOP institutions from fiscal years 2015 through 2019. As figure 6 shows, the highest number of activations (476) were in response to a family member death, injury, or illness. The next most common reasons for a Crisis Support Team activation were a staff injury or illness (437) and a staff assault (177).

⁴⁸A Bureau Battle Buddy liaison provides representation for staff who are familiar with military operations and identifies potential areas of concern for military staff and their families, among other responsibilities.

Figure 6: Reasons for Crisis Support Team Activation within the Bureau of Prisons (BOP) from Fiscal Years 2015 through 2019



Source: GAO presentation of BOP data. | GAO-21-123

Note: The reasons for Crisis Support Team activation were provided by BOP.

Though not among the top reasons for Crisis Support Team activation, there were 75 instances during this period where team members responded to a staff suicide (see Appendix III for additional details about BOP staff suicides).

Employee Assistance Program. In addition to the Crisis Support Teams, BOP officials identified the Employee Assistance Program as the key mental health support mechanism available to BOP staff. BOP's Employee Assistance Program offers confidential assessments, short-term counseling, and referrals to additional services. Program counselors are to provide training to BOP employees on topics such as stress management and suicide awareness.

BOP collects data on the Employee Assistance Program to submit to DOJ's Justice Management Division. This includes data on how many BOP employees attend the training sessions, employee usage of the program, and program administration costs, among other things. DOJ's Justice Management Division collects these data through a template, which it provides to BOP, as well as other DOJ components with

Employee Assistance Programs. However, we identified multiple errors in BOP's Employee Assistance Program-related data.

For example, we found significant variations in BOP's calculated cost per eligible staff member for the Employee Assistance Program from fiscal years 2017 through 2019.⁴⁹ In fiscal year 2017, BOP calculated that the cost per employee was \$266. However, in fiscal year 2018, BOP calculated the cost per employee was \$25, and in fiscal year 2019 the cost per employee was about \$35,000. The difference in the cost per eligible employee for these 3 years was driven by errors in the cost that BOP reported for the program's full time equivalent staff. BOP recorded internal federal staff salary cost of \$7.3 million for four full time equivalent staff in fiscal year 2017, \$89,000 for 5 full time equivalent staff in fiscal year 2018, and \$963 million for four full time equivalent staff in fiscal year 2019. BOP records also show that the eight full time equivalent staff the Employee Assistance Program reported in fiscal year 2015 was reduced to four full time equivalent staff in fiscal year 2016. However, BOP officials told us that there was no reduction in staff from fiscal year 2015 to 2016. According to a BOP official, the data BOP provided to us on its Employee Assistance Program are not collected in real-time, or through any automated system. Rather, BOP institution psychologists provide these data to the Employee Assistance Program coordinator at the end of every fiscal year via email based on their own personal recollections.

The BOP official we spoke with acknowledged the discrepancies we found and said that she had concerns about the numbers the program was reporting. However, she said that she did not oversee the development of the reports and was unable to access the raw data used to create the prior reports.⁵⁰ When asked about the discrepancies in the BOP Employee Assistance Program reports, the Justice Management Division official that received the reports said that she has not been able to analyze the data reported by BOP. The BOP official stated that the Bureau plans to revise its data collection and review efforts to avoid these

⁴⁹BOP calculated the cost per eligible staff member by dividing the Employee Assistance Program total program costs by the total number of BOP federal employees. The total program costs include the Employee Assistance Program's federal staff salary costs, internal federal staff fringe benefit costs, and total external/contract costs.

⁵⁰BOP's Employee Assistance Program coordinator retired during the course of our audit, in June 2020. BOP identified the Administrator for Psychology Services as the official best positioned to respond to our questions about the Employee Assistance Program.

errors in the future, but had not yet started such planning or developed a timeline for completing these efforts as of June 2020.

Standards for Internal Control in the Federal Government state that agencies should collect reliable data in a timely manner based on the identified information requirements—in BOP’s case, the information needed to understand and assess the performance of its Employee Assistance Program. By developing and implementing a method that ensures data on staff participation in, and costs related to, its Employee Assistance Program are collected in a reliable and timely manner BOP would be better assured of the quality of the data, and be positioned to use the data to inform decisions about its administration and management of the program.

In addition, BOP does not collect data from current and departing employees’ through its annual Prison Social Climate Survey and exit surveys on their satisfaction with the Employee Assistance Program. The FEVS, on the other hand, asks survey respondents about their use of and satisfaction with the Employee Assistance Program at their respective agency. However, a BOP official told us that BOP has never analyzed the FEVS responses related to the program to identify trends in employee feedback and satisfaction with it.

BOP officials told us that BOP has not collected feedback from employees about the Employee Assistance Program in a systematic way and has instead relied on anecdotal and informal feedback. However, collecting and analyzing feedback on BOP’s Employee Assistance Program could be beneficial to BOP. In particular, BOP told us in June 2020 that it was in the process of ending its contract with its Employee Assistance Program provider and is seeking a new one to enhance program services. One example of a program service that BOP would like to enhance is tele-psychology—whereby staff working in rural locations with limited provider options could connect to psychologists via the computer. The official stated that she heard anecdotally from staff that this is a need they wish BOP would fulfill. Yet, the official stated that BOP has not solicited feedback more formally or more broadly from employees on their views regarding current program strengths or deficiencies, or on what they would like a revised program to offer.

OPM guidance from the Employee Health Services Handbook, states that an agency may wish to establish criteria for evaluating their Employee

Assistance Program.⁵¹ OPM provides some common methods to evaluate an Employee Assistance Program, including by using supervisory and employee questionnaires and interviews to assess utilization, program availability and accessibility, satisfaction with program services, and overall program effectiveness. By developing and implementing a method to routinely collect and evaluate employee feedback on its Employee Assistance Program, BOP would be better positioned to help ensure employee satisfaction and to identify ways to continually enhance the program to address employee's needs. Such a method could include leveraging existing tools, such as the employee feedback surveys BOP already has in place, or creating new ones, as applicable.

BOP Has Prevention and Response Efforts Underway to Address Staff Deaths by Suicide but Could Do More to Analyze and Learn from the Data It Collects

BOP's Psychology Services has established activities geared toward staff health, wellness, and safety as a top priority, including suicide prevention. In addition, BOP officials described multiple prevention and response efforts that BOP has related to staff deaths by suicide. However, BOP does not fully analyze and learn from the data it collects.

For example, in addition to Crisis Support Teams, BOP central office staff initiated another suicide-related intervention in 2019 called a "Postvention." Specifically, BOP staff from the Reentry Services Division are to go to the affected institution 2-8 weeks following a staff death by suicide to meet with executive staff and others. Following their meetings, the Division has issued internal after action memoranda. Based on our review of two such memoranda that BOP issued during the course of our audit, these documents described the meetings that occurred during the visit, including who attended and what was discussed. The memos also provided recommendations for the executive staff at the individual institutions to enhance current staff suicide prevention initiatives. These recommendations included proactively addressing feelings of helplessness by promoting the message that staff suicide prevention is a communal responsibility, and utilizing caring language toward staff members, such as phrases like, "I'm concerned about you."

Also in 2019, BOP sent a memorandum to all BOP Psychologists entitled "Suicide Prevention for BOP Staff." The memorandum stresses various suicide prevention messages, including that "corrections is a hard business," and that, correctional workers are likely to struggle at some

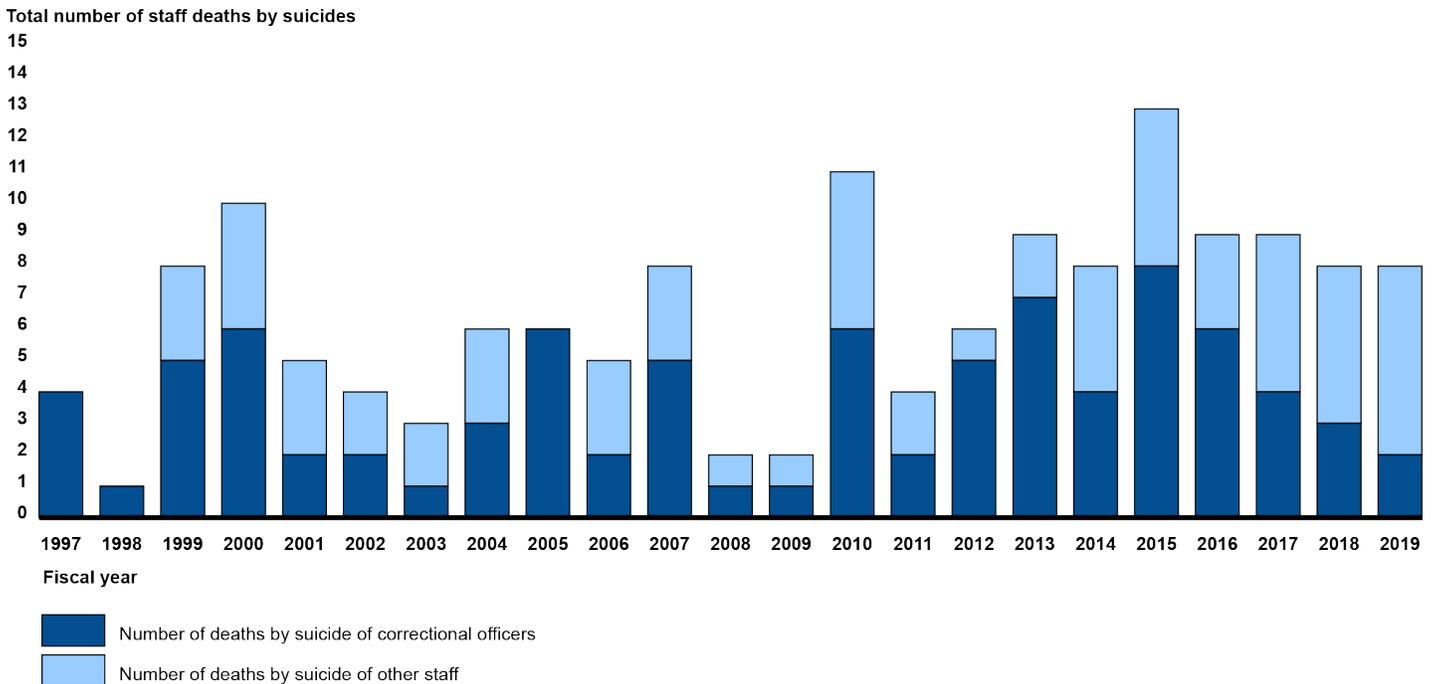
⁵¹"Employee Health Services Handbook, Chapter 3: Administering Employee Assistance Programs," Office of Personnel Management, accessed August 6, 2020, "<https://www.opm.gov/policy-data-oversight/worklife/reference-materials/employee-health-services-handbook/#url=Chapter-3>"

point in their career. The memorandum also outlines that BOP leadership, such as wardens, associate wardens, and supervisors should be the “messengers” of suicide prevention since, according to BOP, they are the individuals with the power to make cultural changes related to those staff who might need to seek help.

In addition to these prevention and response efforts, BOP has tracked data on staff deaths by suicide that have occurred while the staff member was on or off duty since fiscal year 1997.⁵² From fiscal years 1997 through 2019, 149 BOP staff have died by suicide. Of these individuals, 86 were correctional officers. The remaining 63 included lieutenants, cook foremen, and clinical nurses, among others. Figure 7 shows the number of suicides per year among correctional officers and other staff. For a more detailed synopsis of how BOP tracks these figures, see Appendix III.

⁵²BOP does not collect death information for employees who have separated from the Bureau.

Figure 7: Total Number of Bureau of Prisons' (BOP) Staff Deaths by Suicide, from Fiscal Years 1997 through 2019, for Correctional Officers and All Other Staff



Source: GAO analysis of BOP data. | GAO-21-123

However, as of September 2020, BOP officials responsible for collecting and maintaining these data told us that they do not calculate the suicide rate across the Bureau, or compare this rate to the nationwide average for context.⁵³ According to the National Institute of Mental Health, calculating the suicide rate per 100,000 people allows for comparisons by year, since population is taken into account. Further, calculating the suicide rate can be a useful exercise to aid in understanding the relative proportion of people affected within different demographic groups. In our analysis of the suicide rate among BOP staff from 2015 through 2019, we

⁵³BOP provided a summary rate of suicides from 1997 through 2005 only. When we attempted to verify the suicide rate that BOP had calculated from 1997 through 2005, BOP told us that they could not attest to the process that was used to calculate the rates, because these rates used to be collected in paper files and only summary data rates were saved and converted to electronic files.

found that this rate exceeded the rate of suicides nationwide—see table 2.⁵⁴

Table 1: Bureau of Prisons (BOP) Suicide Rate Compared to Nationwide Suicide Rate by Year

	Total BOP staff deaths by suicide per fiscal year	Total filled BOP staff positions	Suicide rate per 100,000 BOP filled staff positions	Suicide rate per 100,000 nationwide
2015	13	37,258	34.9	13.3
2016	9	37,492	24.0	13.5
2017	9	35,568	25.3	14.0
2018	8	34,744	23.0	14.2
2019	8	34,857	23.0	N/A ^a

Source: GAO analysis of BOP and Centers for Disease Control and Prevention (CDC) data. | GAO-21-123

Notes: BOP staffing levels and suicide data are reported on a fiscal year basis, while the CDC reports suicide data on a calendar year basis.

^aCDC had not yet published suicide data for 2019 as of the time of our report.

BOP officials agreed that comparing the internal BOP suicide rate to the national rate is a clear next step to add context to the information they collect. However, BOP officials said that it would not be possible to determine causes of BOP staff deaths by suicide or why suicide rates were higher in some years, even if it had a robust research program, because each circumstance is unique. BOP officials told us, however, that they plan to examine Bureau data in more detail and will work to learn about suicide risks in order to address them.

Although BOP officials told us that they would not be able to identify the specific reasons for staff deaths by suicide, they stated that BOP has used the data officials collect to identify groups of employees that it considers to be at high risk of death by suicide, such as staff with substance use disorders and disciplinary concerns. Further, BOP officials told us that they provide targeted training on suicide prevention to these high risk groups. However, based on our review of the training materials BOP provided to us, we did not identify any content that was targeted to high risk groups and that would assist them in dealing with the challenges they may be facing.

⁵⁴To calculate the suicide rate among BOP employees, we divided the number of suicides per year by the number of filled BOP staff positions in the same year, and then multiplied this rate by 100,000 people. The CDC calculates the nationwide suicide rate as the number of suicides per 100,000 people in a population.

BOP has already made resource investments to send personnel out to comfort staff who have lost a colleague as part of its Crisis Support teams, and is planning to make further resource investments to its Employee Assistance Program when it awards the next support contract. In light of its priority to ensure the health, wellness, and safety of its employees, as well as what the research shows about the challenges of working in a corrections environment, assessing its suicide rate would help BOP more clearly understand the extent to which deaths by suicide are occurring within its workforce, what these year over year trends are, and how best to tailor its efforts to prevent suicides among BOP staff.

Since BOP is already investing in some suicide prevention efforts, using the data it collects to routinely assess the suicide rate among its staff could provide insight into the extent of the problem among BOP and its staff. Additionally, using the data BOP collects to tailor its suicide prevention training materials towards high risk groups would help ensure its training efforts target groups of BOP staff who are most in need of the information.

Conclusions

BOP is responsible for ensuring the care and custody of federal inmates, as well as the safety and security of its staff, including staff health and wellness. However, we identified several opportunities for BOP to better analyze staffing data and improve employee wellness programs. Specifically, a reliable method for calculating staffing levels would give BOP a more accurate picture of the extent of any staffing shortfalls, when such shortfalls began, at which institutions those shortfalls exist, and which positions and series are affected. Having a reliable method for calculating staffing levels would also better position BOP to take corrective action to address any staffing shortfalls, as needed. Further, developing and implementing a plan for analyzing data to help identify and address the causes and potential impacts of staffing challenges on staff and inmates would help BOP, in part, to understand the challenges staff face, the reasons why they may be losing staff, and related challenges attrition causes those who remain onboard. Related, conducting a risk assessment of its overtime and augmentation use would better position BOP to identify the potential risks these methods pose to staff, inmates, and institution security, and respond as appropriate.

Additionally, as BOP continues with its efforts to promote recruitment, retention, and relocation incentives, it should assess its outcomes to determine program effectiveness. Likewise, as BOP makes plans to enhance its Employee Assistance Program, it can benefit from developing and implementing a method that ensures data on staff participation and

related costs are collected in a reliable and timely manner and by developing and implementing a method to routinely collect and evaluate employee feedback. Finally, BOP has embarked on a number of efforts to protect the mental health of its staff, but BOP could do more to analyze and learn from the data it collects. Understanding what the data show and sharing it with those who design and deliver the training would help BOP tailor its suicide prevention materials towards high risk groups and would help ensure its training efforts target groups of BOP staff who are most in need of the information.

Recommendations for Executive Action

We are making the following seven recommendations to BOP:

The Director of BOP should develop and implement a reliable method, or amend existing methods, for calculating staffing levels at BOP institutions. (Recommendation 1)

The Director of BOP should develop and implement a plan for analyzing data to help identify and address the causes and potential impacts of staffing challenges on staff and inmates. (Recommendation 2)

The Director of BOP should conduct a risk assessment of its overtime and augmentation use, including identifying risks to staff, inmates, and institution security; and determining actions to respond, as appropriate. (Recommendation 3)

The Director of BOP should assess the outcomes of the staffing incentives it utilizes by developing performance measures and goals, measuring outcomes against them, and adjusting incentives, as appropriate. (Recommendation 4)

The Director of BOP should develop and implement a method that ensures its Employee Assistance Program participation and cost data are collected in a more timely and reliable manner. (Recommendation 5)

The Director of BOP should develop and implement a method to routinely collect and evaluate employee feedback on its Employee Assistance Program such as leveraging existing tools or creating new ones, as applicable. (Recommendation 6)

The Director of BOP should utilize the suicide data it collects to routinely assess the suicide rate among BOP staff and tailor its suicide prevention training materials to address the unique challenges that high-risk groups may face. (Recommendation 7)

Agency Comments

We provided a draft of this report to the Department of Justice for review and comment. The Department concurred with our recommendations and told us they had no comments on the draft report. The Department did provide technical comments, which we incorporated as appropriate.

We are sending copies of this report to the appropriate congressional requesters, the BOP Director, and other interested parties. In addition, the report is available at no charge on GAO's website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact Gretta L. Goodwin at (202) 512-8777 or GoodwinG@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix V.



Gretta L. Goodwin
Director, Homeland Security and Justice

Appendix I: Objectives, Scope, and Methodology

Our objectives were to examine (1) the methods BOP uses to assess staffing levels and how it identifies and addresses the potential causes and impacts of any staffing challenges; (2) the practices BOP uses to address any staffing challenges, and the extent to which it assesses the effectiveness of such practices; and (3) what is known about the effects of the corrections environment on the mental health of staff and what, if anything, BOP could do to improve upon staff mental health and related services.

To address our first objective, we reviewed the three methods BOP uses for assessing staffing levels. We analyzed BOP's institutional staffing data—from fiscal year 2015 through the second quarter of fiscal year 2020—that BOP reported using to assess staffing levels and identify staffing shortfalls.¹ We selected this timeframe to analyze multiple years of trend data. We did not analyze staffing data past March 2020 in order to avoid potential anomalies in the data due to staffing deployments associated with BOP's response to the Coronavirus Disease 2019 (COVID-19). We assessed BOP's staffing data to determine if it was reliable for determining the existence of staffing shortages. We compared BOP staffing-related documents for consistency of data and language, as well as to verify support for BOP officials' explanations for how BOP calculates staffing shortages. We determined the data was not sufficiently reliable for the purpose of determining the existence of staffing shortages due to limitations we discuss in this report.

To assess the second part of our first objective—how BOP identifies and addresses the causes and potential impacts of staffing challenges—we reviewed staffing-related documentation. This included reviewing BOP's 2018 exit survey report for BOP employees, as well as BOP's annual Prison Social Climate Survey instruments and Federal Employee Viewpoint Survey (FEVS) instruments from 2015 through 2019.² Further,

¹Some data BOP provided was tied to biweekly pay periods. Pay period 7 of 2020 began on March 29, 2020 and ended on April 11, 2020. To ensure we reviewed data that included all of March 2020, BOP included pay period data that extended through April 11, 2020.

²BOP's annual staff exit survey reports summarize and include analysis of the data BOP receives through employee exit surveys, which BOP provides to employees before they separate from BOP. BOP's Prison Social Climate Survey measures employee impressions and attitudes about conditions at the institution where they currently work. The Office of Personnel Management conducts the annual Federal Employee Viewpoint Survey to measure employee perceptions of whether, and to what extent, conditions characteristic of successful organizations are present in their agencies.

we reviewed BOP documents relating to evidence of staffing-related challenges, such as documentation supporting a staffing reduction at BOP in 2018, congressional testimony from former BOP directors between 2009 and 2019, and DOJ OIG's annual *Top Management and Performance Challenges* reports between 2011 and 2018 to obtain more information about BOP staffing challenges.³ We also reviewed BOP's quarterly internal reports on the time it takes to hire employees. Additionally, our documentation review included documents from the Office of Management and Budget (OMB) providing agencies direction related to the hiring freeze that started in 2017, and subsequent DOJ and BOP memoranda, guidance, and instructions on the hiring freeze. We also reviewed documentation related to BOP positions that were eliminated in 2018.

In order to obtain agency perspectives on all parts of our first objective, we interviewed BOP officials from several divisions, including BOP's Human Resource Management Division (which is responsible for coordinating BOP personnel matters); the Grand Prairie Office Complex (which contains the Human Resource Services Center); and all six BOP regional offices (which provide oversight and assistance to institutions in their respective regions). We identified additional BOP offices and divisions to interview as we reviewed BOP documentation. For example, upon reviewing BOP budget-related documentation, we interviewed officials from DOJ's Justice Management Division, which is responsible for managing the department's budget, to understand how they develop BOP's staffing budget and monitor hiring. We also interviewed DOJ and BOP officials about the hiring freeze that began in 2017.

For additional context about BOP staff perceptions related to the challenges they face on the job, we reviewed documentation of interviews from our published reports relating to BOP for BOP staff mentions of

³Department of Justice Office of the Inspector General, *Top Management and Performance Challenges in the Department of Justice - 2011*, Memorandum for the Attorney General and the Deputy Attorney General (November 8, 2011). See Appendix II for full list of citations for years 2011 through 2018.

staffing shortfalls or related challenges.⁴ We limited our review of this documentation to work conducted since 2016 to ensure that any perspectives provided were recent. We also interviewed stakeholder groups representing inmates and former inmates to obtain their views on how staffing challenges impact the inmate experience. Though these interviews are not generalizable, they provide useful insight into the impacts of staffing challenges on inmates. We evaluated BOP's efforts to assess staffing levels and to identify causes and impacts of staffing challenges against selected *Standards for Internal Control in the Federal Government*.⁵ We determined that the information and communication component of internal control was significant to this objective, along with the underlying principle that management should use quality information to achieve the entity's objectives.

To address our second objective, we reviewed relevant BOP documentation to better understand how BOP addresses staffing challenges, including BOP's records of employee overtime and augmentation, as well as BOP's criteria related to recruitment, relocation, retention, and other incentives.⁶ We also analyzed BOP's data on use and cost of overtime from fiscal year 2015 through fiscal year 2019. We also reviewed records related to the use of these incentives from 2015 through July 2020, the most recently available data at the time of our analysis.⁷ We assessed the reliability of this data by interviewing knowledgeable officials regarding their data systems and how the data is

⁴We reviewed interviews from *Bureau of Prisons: Better Planning and Evaluation Needed to Understand and Control Rising Inmate Health Care Costs*, [GAO-17-379](#) (Washington, D.C.: June 29, 2017), *Bureau of Prisons: Better Planning and Evaluation Could Help Ensure Effective Use of Retention Incentives*, [GAO-18-147](#) (Washington, D.C.: Dec. 7, 2017), and *Federal Prisons: Additional Analysis Needed to Determine Whether to Issue Pepper Spray to Minimum Security Prisons*, [GAO-20-342](#) (Washington, D.C.: June 22, 2020).

⁵GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014). Internal control is a process effected by an entity's management, oversight body, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved.

⁶Augmentation is BOP's practice of assigning non-custody staff to serve in a custody role. Augmentation is discussed in further detail in this report.

⁷An obligation is a definite commitment that creates a legal liability of the government for the payment of goods and services ordered or received. An "expenditure" is defined as the actual spending of money. For the purposes of this report, we use the word spent when discussing BOP expenditures from fiscal years 2015 through 2019, as well as obligations from fiscal year 2020.

used, and found the data sufficient for analyzing BOP's response to staffing challenges.

Additionally, we reviewed BOP documentation that governs augmentation and overtime, such as time and attendance guidance and the Master Bargaining Agreement between BOP and its union members. To further evaluate what efforts BOP has taken to address staffing concerns, we reviewed relevant Office of Personnel Management (OPM) documentation and instructions related to hiring flexibilities. To identify the effectiveness of BOP's steps to address staffing shortfalls, we evaluated BOP's 2019 Strategic Plan, DOJ's Annual Performance report from 2019, and documentation pertaining to BOP's 2019 contract for recruitment and rebranding to improve its hiring efforts. We also reviewed BOP's April 2020 Human Capital Operating Plan. Additionally, we reviewed a prior, internal BOP study on the effectiveness of retention incentives that BOP completed in 2019.

To obtain information on how BOP addresses staffing challenges, we interviewed officials from all six regional offices and five divisions, including BOP's Administration Division, which contributes to budget development and execution. We also interviewed relevant BOP officials, including officials from BOP's Workforce Systems and Evaluation Section, who provided information on BOP's use of retention incentives. We evaluated BOP's efforts against The Government Performance and Results Act of 1993 (GPRA), as updated and expanded by the GPRA Modernization Act of 2010 (GPRAMA), which directs agencies to develop and document goals, as well as performance measures to assess progress towards their goals.⁸ We determined that the monitoring component of internal control was significant to this objective, along with the underlying principle that management should evaluate issues and remediate deficiencies to help internal control remain aligned with changing objectives, laws, resources, and risks. We also determined that the risk assessment component of internal control was significant to this objective, along with the underlying principles that management should define objectives clearly to enable the identification of risks and define risk tolerances, and that management should identify, analyze, and respond to risks related to achieving the defined objectives.

⁸Government Performance and Results Act of 1993 (GPRA), Pub. L. No. 103-62, 107 Stat. 285 (1993); GPRA Modernization Act of 2010, Pub. L. No. 111-352, 124 Stat. 3866 (2011).

To address our third objective, we reviewed multiple relevant studies included in a bibliography and literature review developed by DOJ's National Institute of Corrections.⁹ This review included studies that surveyed the health status of correctional officers, such as the prevalence of hypertension and post-traumatic stress disorder. We also reviewed BOP documentation of employee wellness programs for content and accuracy. This included records of BOP's activation of Crisis Support Teams, which provide peer support to staff in response to critical incidents, and BOP reports related to the agency's Employee Assistance Programs, which generally offer counseling and training to staff. We assessed the reliability of this documentation by interviewing knowledgeable officials regarding their data systems and how the data is used, as well as analyzing documentation for internal consistency, and found the documentation sufficient for assessing how BOP addresses staff mental health issues. However, we determined the data was not sufficiently reliable for the purposes of reporting on participation and the costs associated with BOP's EAP for reasons we discuss in this report.

In conjunction with this work, we compared BOP's actions against OPM guidance from the Employee Health Services Handbook, which relate to common methods agencies can take to evaluate their Employee Assistance Programs.¹⁰ As part of our efforts to analyze wellness-related concerns of working in the corrections environment, we reviewed BOP's records of staff deaths by suicide and BOP documentation pertaining to suicide prevention efforts. Additionally, we compared BOP staff rates of suicide to the overall rates of suicide in the U.S. by utilizing Centers for Disease Control and Prevention (CDC) data.¹¹

To obtain information on how the corrections environment impacts corrections staff, we also interviewed BOP officials and stakeholders with knowledge of the effects of the corrections environment on the mental

⁹The National Institute of Corrections is an agency within BOP that provides training, technical assistance, information services, and policy/program development assistance to Federal, state, and local corrections agencies. The National Institute of Corrections developed this literature review to provide an overview on what information is available on suicide by correctional officers and the impact workplace stress can have on officers

¹⁰Employee Health Services Handbook, Chapter 3: Administering Employee Assistance Programs," Office of Personnel Management, accessed August 6, 2020, "<https://www.opm.gov/policy-data-oversight/worklife/reference-materials/employee-health-services-handbook/#url=Chapter-3>"

¹¹Age-adjusted suicide data was gathered from the National Center for Health Statistics' National Vital Statistics System.

health of staff and how BOP is working to address these effects. For example, we interviewed selected stakeholders with knowledge of the corrections environment, whom we identified through a review of publications and related presentations at corrections-related conferences. Though our interviews with these stakeholders are not generalizable, they provide insight into the impacts of the corrections environment on corrections staff. We also interviewed BOP officials with responsibility for administering employee wellness programs, as well as individuals in BOP's Psychology Services Department. We determined that the information and communication component of internal control was significant to this objective, along with the underlying principle that management should obtain relevant data from reliable sources to achieve the agency's objectives.¹² We assessed BOP's use and collection of reliable data to achieve its objective of supporting employee wellness. Further, we assessed BOP efforts in light of OPM's Employee Health Services Handbook guidance, which states that agencies may wish to establish criteria for evaluating their Employee Assistance Program, and provides common methods for such evaluations.

We conducted this performance audit from October 2019 to February 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

¹²[GAO-14-704G](#).

Appendix II: References to Bureau of Prisons (BOP) Staffing Challenges

Table 5 illustrates excerpts from testimonies and the Department of Justice Office of the Inspector General’s (DOJ OIG) reports related to BOP staffing challenges.

Table 2: References to Bureau of Prisons’ (BOP) Staffing Challenges, as Excerpted from Written Documents and Testimony the BOP Directors and the Department of Justice Office of Inspector General (DOJ OIG) Provided from 2009 through 2019

Source	Year	Reference
Congressional Testimony: BOP Director Harley G. Lappin	2009	All of our programs, services, and operations are affected by the number of inmates we are required to confine and the number of staff we have to provide these programs and services. In recent years, the growth in the inmate population has far outpaced BOP bed space, capacity, and staffing. ^a
Congressional Testimony: BOP Director Harley G. Lappin	2010	Preparing inmates for reentry, including implementing the requirements of the Second Chance Act, is a high priority for the BOP. But we are limited in our ability to attend to this priority due to the high level of crowding and constrained level of staffing in our institutions. ^b
DOJ OIG Top Management and Performance Challenges 2011	2011	The BOP’s staffing has not increased commensurately with the inmate population... According to the BOP, increases in prison crowding and the inmate-to-staff ratio are correlated with increases in inmate violence. The stretching of the BOP workforce also increases the challenge for the BOP to detect and prevent misconduct by staff members. ^c
Congressional Testimony: BOP Director Charles E. Samuels, Jr.	2012	As you know, the Bureau population continues to increase, and limited budgets have prevented us from increasing our capacity and our staffing to keep pace with this growth. We face dramatically increasing inmate-to-staff ratios and extreme levels of crowding. ^d
DOJ OIG Top Management and Performance Challenges 2013	2013	[Federal] prisons are facing a number of important safety and security issues, including, most significantly, that they have been overcrowded for years and the problem is only getting worse. Since 2006, Department officials have acknowledged the threat overcrowding poses to the safety and security of its prisons, yet the Department has not put in place a plan that can reasonably be expected to alleviate the problem. ^e
Congressional Testimony: BOP Director Charles E. Samuels, Jr.	2014	Both the high crowding and low staffing levels contribute to the rate of violence in our prisons. Last year alone, more than 120 staff were seriously assaulted by inmates, most often in our high-security institutions. In addition, nearly 200 inmates were seriously assaulted by other inmates. ^f
Congressional Testimony: BOP Director Charles E. Samuels, Jr.	2015	The tremendous growth in the inmate population outpaced staffing resources and negatively impacted institution safety. Our ability to effectively supervise prisoners and provide inmate programs depends on having sufficient numbers of staff available at our prisons. ^g
DOJ OIG Top Management and Performance Challenges 2016	2016	While the inmate population has dropped 3 years in a row, falling to 192,170 at the end of FY 2016, overcrowding remains a challenge. As of September 30, 2016, BOP’s institutions remained 16 percent over rated capacity, and high security institutions were 31 percent over rated capacity. This is a significant concern because more than 90 percent of high security inmates have a history of violence. ^h

**Appendix II: References to Bureau of Prisons
(BOP) Staffing Challenges**

Source	Year	Reference
DOJ OIG Top Management and Performance Challenges 2017	2017	Staffing, aging facilities, and tightening budgets present constant challenges for the BOP in carrying out its mission to confine offenders in safe, humane, and cost-efficient environments. Across the federal government, agencies are facing flat or declining budgets, and, earlier this year, the Office of Management and Budget issued guidance instructing agencies to take immediate actions to achieve workforce reductions and cost savings. The challenge for the Department is managing a federal prison system that over the past 20 years has taken an ever larger share of the Department's budget, currently accounting for nearly 25% of the Department's budget, yet remains overcrowded. ⁱ
DOJ OIG Top Management and Performance Challenges 2018	2018	While the federal inmate population has been declining in recent years, many BOP institutions remain over their capacity and providing medical care to inmates continues to account for a major portion of BOP's overall spending at nearly \$1.18 billion. Further, the Department has said it anticipates a slight prison population increase in FY 2019. Resource limitations, staffing shortages, and aging infrastructure, combined with this possible prison population increase, has the potential to exacerbate BOP's challenges in ensuring that its institutions are safe and secure. ^j
Congressional Testimony: BOP Director Kathleen Hawk Sawyer	2019	Staff safety is our most critical concern. Absolutely. And the vacancies we have in staffing right now are just unacceptable. They've come about because of several years of uncertainty about our budgets, uncertainty about the number of positions we were allowed to fill. ^k

Source: GAO analysis of DOJ OIG reports and congressional testimony. | GAO-21-123

ⁱFederal Bureau of Prisons Oversight, Before the House Subcommittee On Crime, Terrorism, and Homeland Security, 111th Cong. 12 (2009). (testimony of Director of Federal Bureau of Prisons Harley G. Lappin).

^bHarley G. Lappin, Director, Federal Bureau of Prisons, Housing D.C. Felons Far Away from Home: Effects on Crime, Recidivism, and Reentry, testimony before the House Subcommittee on Federal Workforce, Postal Service, and the District of Columbia, 112th Cong., May 5, 2010.

^cDepartment of Justice Office of the Inspector General, Top Management and Performance Challenges in the Department of Justice - 2011, Memorandum for the Attorney General and the Deputy Attorney General (November 8, 2011).

^dReassessing Solitary Confinement: The Human Rights, Fiscal, and Public Safety Consequences, Before the Senate Subcommittee on Constitution, Civil Rights and Human Rights, 112th Cong. (2012) (statement of Director of Federal Bureau of Prisons Charles E. Samuels, Jr.).

^eDepartment of Justice Office of the Inspector General, Top Management and Performance Challenges in the Department of Justice - 2013, Memorandum for the Attorney General and the Deputy Attorney General (December 11, 2013).

^fReassessing Solitary Confinement II: The Human Rights, Fiscal, and Public Safety Consequences, Before the Senate Subcommittee on Constitution, Civil Rights and Human Rights, 113th Cong. 5 (2014) (statement of Director of Federal Bureau of Prisons Charles E. Samuels, Jr.).

^gOversight of the Bureau of Prisons: First-Hand Accounts of Challenges Facing the Federal Prison System, Before the Senate Committee on Homeland Security and Governmental Affairs, 114th Cong. 31 (2015) (statement of Director of Federal Bureau of Prisons Charles E. Samuels, Jr.).

^hDepartment of Justice Office of the Inspector General, Top Management and Performance Challenges in the Department of Justice - 2016, Memorandum for the Attorney General and the Deputy Attorney General (November 10, 2016).

ⁱDepartment of Justice Office of the Inspector General, Top Management and Performance Challenges in the Department of Justice - 2017, Memorandum for the Attorney General and the Deputy Attorney General (October 16, 2017).

^jDepartment of Justice Office of the Inspector General, Top Management and Performance Challenges in the Department of Justice - 2018, Memorandum for the Attorney General and the Deputy Attorney General (November 10, 2018).

^kKathleen Hawk Sawyer, Director, Federal Bureau of Prisons, Washington D.C., testimony before the House Subcommittee on Crime, Terrorism, and Homeland Security, 116th Cong., October 17, 2019.

Appendix III: Summary of Staff Deaths by Suicide Data the Bureau of Prisons Tracks

BOP collects basic demographic information on staff who have died by suicide such as gender, age, race, position at BOP, and tenure at BOP. BOP also collects anecdotal information, such as life stressors and alcohol use; however, BOP officials stated that this anecdotal information represents “common knowledge” among the deceased individual’s colleagues at the institution rather than data BOP has verified.¹ BOP has analyzed some of these variables, including both demographic and anecdotal information.

Information about a staff death by suicide comes from a variety of sources, including, but not limited to, the institution warden, human resource staff, and the chief psychologist. According to BOP documentation, if the death occurred on institution grounds and it appears to be a suicide, the warden reports facts and refrains from labeling the death a suicide until a final investigation is complete.

From fiscal years 1997 through 2019, BOP staff deaths by suicide occurred in all six BOP regions, as shown in Table 3.

Table 3: Total Number of Staff Deaths by Suicide by Bureau of Prisons (BOP) Region from Fiscal Years 1997 through 2019

Region	Total number of staff deaths by suicide
North Central Region	37
Mid-Atlantic Region	29
South Central Region	15
Northeast Region	28
Western Region	25
Southeast Region	12
BOP Central Office ^a	3
Total	149

Source: GAO analysis of BOP data. | GAO-21-123

^aThere were three deaths by suicide of staff that worked at BOP’s central office, which BOP does not consider to be associated with one of their six regions.

From fiscal years 1997 through 2019, BOP staff deaths by suicide occurred in 76 institutions. Table 4 shows the institutions with the most staff deaths by suicide from fiscal years 1997 through 2019. All other

¹Because BOP reported that this information is anecdotal, we did not conduct any analyses on the “common knowledge” factors that BOP tracks.

institutions had three or fewer staff deaths by suicides over this time period.

Table 4: Eight Bureau of Prisons (BOP) Institutions with Highest Total Number of Staff Deaths by Suicide from Fiscal Years 1997 through 2019*

Institution	Total number of staff deaths by suicide
Florence Federal Correctional Complex	8
Terre Haute Federal Correctional Complex	5
Victorville Federal Correctional Complex	5
Cumberland Federal Correctional Institution	4
Marion U.S. Penitentiary	4
San Diego Metropolitan Correctional Center	4
Manchester Federal Correctional Institution	4
Butner Federal Correctional Complex	4

Source: GAO analysis of BOP data. | GAO-21-123

*Note: BOP complexes are combinations of individual institutions with different missions and security levels that are located in close proximity to one another.

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

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Staff Acknowledgments

In addition to the contact named above, Joy Booth (Assistant Director), Melissa Hargy (Analyst-in-Charge), Justin Bolivar, and Lauren Shaman made key contributions to this report. In addition, key support was provided by Kirsten Lauber, Dominick Dale, Susan Hsu, Adam Vogt, Benjamin Crossley, Steven Lozano, Leah Nash, and Billy Commons.

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