



# Audit of the Federal Bureau of Prisons' Management of the National Gang Unit



AUDIT DIVISION

24-115

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**SEPTEMBER 2024**

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REDACTED FOR PUBLIC RELEASE

*Note: Redactions in this document are the result of sensitivity designations we received from the Federal Bureau of Prisons (BOP) as part of a sensitivity review process formally initiated by the Office of the Inspector General (OIG) in October 2023. As to several of the initial sensitivity designations, the Office of the Inspector General (OIG) disagreed with the bases asserted by the BOP and attempted to work with the BOP to ensure maximum transparency. Although significant progress was made in this regard, after nearly 1 year, disagreements remain. As a result, this public report includes redactions on which the OIG does not agree. We are requesting that the BOP reconsider the disputed sensitivity designations so that we can unredact those portions and make the associated information available to the public.*





## EXECUTIVE SUMMARY

### Audit of the Federal Bureau of Prisons' Management of the National Gang Unit

#### (U) Objective

(U) The objective of this audit was to assess the Federal Bureau of Prisons' (BOP) management of the National Gang Unit (NGU) and its process for identifying, designating, and tracking incarcerated gang members.

#### (U) Results in Brief

(U) In January 2021, the BOP transitioned its Sacramento Intelligence Unit (SIU) to its newly formed NGU. The BOP shifted gang intelligence oversight to the NGU in an effort to ensure better coordination within the Intelligence and Counter Terrorism Branch (ICTB) and improve usefulness to outside agencies through a central contact. While we found that the NGU had a more integrated structure, greater resources, and was better able to operate at a national level, we determined that it had inadequate and outdated policies and quality control measures that significantly impacted its ability to effectively carry out its gang oversight mission. For example, we found that BOP policy does not require the NGU to periodically reassess its designation of a gang as a security threat group (STG), potentially resulting in oversight resources being utilized on gangs with waning influence and decreased risk. Also, in limited circumstances where certain subgroups of STGs were required to be periodically reassessed, we found poor documentation and inconsistent application of the criteria used to perform these required reassessments. We further identified concerns related to how the BOP validated its inmates' gang affiliations and communicated with inmates regarding its process for cutting gang ties (referred to as disassociation). Lastly, we identified needed improvements to the NGU's intelligence gathering and information sharing responsibilities, clear operational guidance, and specialized training for NGU staff.

#### (U) Recommendations

(U) We make 13 recommendations to the BOP to improve the operations of the NGU and its management and oversight of the BOP's gang-affiliated population.

#### (U) Audit Results

(U) In January 2021, the NGU assumed responsibility for intelligence-based management and oversight of the BOP's gang-affiliated population from the national level. However, we found the BOP had inadequate and outdated policies and quality control measures in place at the time the NGU commenced its activities, which we believe has negatively impacted its ability to perform its important mission.

#### (U) Designation of Gangs within the BOP

(U) The BOP generally defines "gangs" as groups formed either in the community or in prison, including organized street gangs, prison gangs, criminal organizations, or other groups of inmates with a shared ideology, which may act on behalf of themselves or other highly structured groups. However, at the time of our audit the BOP did not maintain a formal list of gangs operating within its institutions. We determined that there were a total of 82 gangs operating within BOP institutions and a total of 17,029 inmates affiliated with at least 1 of these gangs, as of April 2022. We based our determination on BOP data, our review of applicable BOP policy, and our identification of the groups, gangs, or organizations for which the NGU played a role in the gang validation process or trend monitoring.

#### (U) Security Threat Group Assessments

(U) The BOP generally considers gangs to be a part of a broader population that the BOP formally refers to as security threat groups (STG). STGs are defined as "inmate groups, gangs, or organizations acting in concert to promote violence, escape, drug, or terrorist activity." An STG designation is a tool to assist in managing groups that pose an elevated risk. However, we found that after a gang is designated as an STG, the NGU does not conduct a periodic reassessment to ensure the gang still satisfies the BOP's STG criteria. In fact, we determined that 76 percent of the gang-affiliated inmates in BOP custody were associated with only 10 gangs, while the



remaining 24 percent were affiliated with the other 72 gangs. We further found that 33 of these 72 gangs had fewer than 25 affiliated inmates. Two gangs had only one affiliated inmate in the entire BOP organization. Although we understand that the size of the gang alone is not determinative of the risk it may pose, we believe the BOP could benefit from a periodic reassessment of STG-designated gangs to ensure that the NGU is not using its limited resources on gangs and gang members with waning influence and posing minimal risks.

#### **(U) Enhanced Gang-related Security Measures**

(U//LES) STGs that pose a heightened risk to BOP staff and facilities may receive the additional BOP designation of a "disruptive group." A disruptive group is an STG that the BOP has formally certified as posing a threat to security that cannot be managed by routine measures. BOP policy requires an [REDACTED] of each disruptive group. Overall, we found that the BOP had certified 6 of the 82 identified gangs as disruptive groups. While such certifications may have been warranted, we found that the documentation supporting these six certifications lacked sufficient detail to justify the designation. We also found inconsistencies in the application of the criteria that is intended to ensure that disruptive group recertification reviews are objective and consistent.

#### **(U) Emerging Gang Threats**

(U//LES) When the BOP identifies a gang that does not meet the criteria for an STG, but requires closer observation for affiliation growth and activities, it may be labeled a "management interest group" (MIG). Although the MIG designation is not used exclusively for gangs, according to BOP policy, all MIGs [REDACTED]. As of April 2022, the BOP had identified [REDACTED] groups, with a combined total of [REDACTED] gang-affiliated inmates, as MIGs. When we asked the BOP to provide us with supporting documentation for [REDACTED], we were told these records did not exist and were not required to be retained under BOP policy.

#### **(U) Utilization of NGU Resources**

(U//FOUO) The NGU divides its gang oversight amongst its Intelligence Officers and Intelligence Analysts who are tasked with developing an understanding of their assigned gangs' structures and their connections across the BOP and beyond. These Intelligence Officers and Analysts also perform selective monitoring and investigate some gang and gang-affiliated activities on an "as needed" basis. However, we found no NGU staff members assigned to oversee 12 of the 82 gangs we

identified during this audit and an additional [REDACTED] gangs with only an Intelligence Analyst assigned to them.

#### **(U) Gang Affiliation Identification and Validation**

(U) It is essential for the BOP to identify inmates with gang affiliations early in their incarceration, or when they start to show signs of affiliation, because the affiliation can affect the inmates' safety and the safety of BOP staff. Erroneous validations can have a meaningful impact because, while in custody, gang-affiliated inmates may be subjected to certain housing restrictions and enhanced monitoring requirements. Therefore, an unsupported validation can potentially impact familial ties and visitation opportunities, and misidentified inmates could be at risk of harm by rival gangs. We performed an in-depth review of a small sample of 10 gang-affiliated inmate files and did not find sufficient evidence in the files to support the BOP's decision to validate gang affiliation for half of the sample.

#### **(U) Disassociation**

(U) Disassociation is a voluntary process that allows gang-affiliated inmates to proactively disengage from their gang affiliations. However, we found that the BOP does not formally inform inmates of the option to participate in this important process. Instead, the BOP relies on informal communications among inmates and interactions with Special Investigative Services (SIS) as the primary method for informing inmates about disassociation. BOP officials stated that formally notifying inmates of the disassociation option might endanger interested inmates or lead to an overwhelming number of disingenuous requests. Although we are sensitive to the BOP's concerns, we believe the informal approach currently in use may put inmates at greater risk or dissuade inmates from considering the option to further their rehabilitation efforts.

#### **(U) Intelligence Gathering, Sharing, and Training**

(U) We believe the lack of clear operational guidance and enhanced training have hampered the NGU's ability to effectively perform its critical intelligence gathering and information sharing mission. For example, we found that the methods used by NGU staff to assess the risk posed by gangs varied widely and were often inconsistent. Further, we found that the intelligence products developed by NGU staff for the benefit of BOP institutions could be more effective if the BOP were to require basic standards and management oversight for these products.



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## (U) Introduction

(U) The Federal Bureau of Prisons (BOP) generally defines "gangs" as groups formed either in the community or in prison, including organized street gangs or prison gangs, that may act on behalf of themselves or other highly structured groups. Gangs of all types are present within the BOP including nationally known and highly organized gangs such as the Aryan Brotherhood, Bloods, Crips, Gambino Crime Family, Hells Angels, the Outlaws, and the Sinaloa Cartel. While in prison, many gang-affiliated inmates continue to commit assaults, traffic illegal substances, actively recruit members, and otherwise disrupt BOP institutions. The BOP's general approach to countering gang activity within its institutions is to identify, track, and monitor gang-affiliated inmates and use the intelligence gathered about them to help prevent additional criminal and otherwise prohibited activity. According to the BOP, this approach helps to maintain the safety and security of its institutions, inmates, and staff.

(U) In January 2021, after approximately two years of effort, the BOP formally transitioned its Sacramento Intelligence Unit (SIU) into its new National Gang Unit (NGU). The BOP shifted gang intelligence oversight from the SIU to the NGU in an effort to ensure better coordination within the Intelligence and Counter Terrorism Branch (ICTB), provide stakeholders a central contact location, and improve its usefulness to outside agencies. According to the Administrator of the ICTB, the SIU had fewer staff and lacked the structure of the newly formed NGU. The only SIU supervisor to transition to the NGU told us that while the SIU did much of the same work as the NGU, the size of the NGU allows it to do a higher volume of work. The NGU now serves as the BOP's central unit for information and intelligence gathering on the activities of the gangs operating within all of the BOP's 122 institutions and the thousands of inmates that are affiliated with them.<sup>1</sup>

### (U) National Gang Unit

(U//FOUO) Organizationally, the NGU is part of the ICTB, which also includes the BOP's Counter Terrorism Unit (CTU) and Intelligence and Investigations Unit.<sup>2</sup> The NGU provides direct assistance to BOP institutions by confirming suspected gang affiliations and assisting gang-affiliated inmates in disassociating from gang organizations. It also provides operational intelligence and investigative support directly to BOP institutions as well as various federal, state, and local law enforcement agencies. NGU staff members [REDACTED] and gather intelligence on them through various methods and sources, including reviewing gang-affiliated inmate communications, incident reports, financial transactions, and sharing gang-related intelligence within the BOP and with outside law enforcement partners.

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<sup>1</sup> (U//LES) The [REDACTED] the NGU and ICTB work with RRC management to share relevant information, as needed.

<sup>2</sup> (U) The NGU is headquartered in Martinsburg, West Virginia and, as of May 2022, included a total staff of 18 employees. Several of these NGU staff members were located outside of the headquarters location, including Intelligence Officers stationed at United States Penitentiary (USP) Big Sandy, USP Canaan, USP Coleman, USP Pollock, Metropolitan Detention Center (MDC) Los Angeles, and Federal Bureau of Investigation (FBI) offices in Puerto Rico and Arizona. In addition, two Supervisory Intelligence Officers were assigned to the FBI's National Gang Intelligence Center and California's Correctional Intelligence Task Force, respectively. There were also three vacant Intelligence Officer positions as of May 2022.



(U) Because the NGU has oversight responsibility for gang-related activities within all BOP institutions, it must rely on individual BOP institutions, particularly Special Investigative Services (SIS) departments, to perform key institution-level functions related to gang-affiliated inmates. This includes initial identification, day-to-day oversight of gang activities, email and telecommunications monitoring when necessary, and forwarding intelligence collected inside their respective institutions about gang activities for further dissemination. SIS departments also address initial requests from gang-affiliated inmates seeking to cut gang ties through a formal disassociation process, which the NGU then facilitates and completes.

## **(U) OIG Audit Approach**

(U) The objective of the audit was to evaluate the BOP's management of the NGU and its process for identifying, designating, and tracking incarcerated gang members. The scope of our audit generally included activities of the NGU and its coordination with SIS departments between January 2021 through July 2022; however, our work incorporated actions, documentation, and data from before this time period. To accomplish the audit objective, we focused on the oversight and actions of the NGU (formerly SIU) in its implementation of relevant BOP policies and procedures for the identification, monitoring, investigation, and disassociation of gang-affiliated inmates and its intelligence gathering and information sharing efforts. Specifically, we reviewed data and information provided from BOP data sources, including SENTRY and TRUINTEL, regarding gang-affiliated inmates, and conducted interviews with BOP representatives, including officials from the ICTB, NGU, and Designation and Sentence Computation Center (DSCC).<sup>3</sup> We also reviewed a sample of files for inmates validated as gang associates and members to determine whether NGU staff followed the BOP's policies and procedures related to validation. Lastly, we completed a review of files for a sample of gang-affiliated inmates who participated in the BOP's disassociation program to determine if the approvals were fully documented and justified in accordance with program criteria.

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<sup>3</sup> (U) SENTRY is a BOP electronic mission support information database that collects, maintains, and tracks critical inmate information, including inmate location, medical history, behavior history, and release data. TRUINTEL is a data application that contains information regarding inmate investigations, incidents, and other relevant information, including gang affiliation.



## **(U) Audit Results**

(U) When the BOP officially transitioned its SIU into the newly formed NGU in January 2021, it provided the BOP with an opportunity to improve upon and provide national-level leadership for its management and oversight of gangs and gang activity throughout its institutions. However, we found the NGU inherited inadequate and outdated policies and quality control measures. For example, we determined that once the BOP designates a gang as a security threat group (STG), its policy does not require that determination to be revisited at any point, potentially resulting in an outdated universe of BOP-designated gangs and limited resources being dedicated to gangs with declining influence and decreasing risk profiles. In addition, in the limited circumstances where certain subgroups of STGs are required to be periodically reassessed, we found poor documentation and inconsistent application of the criteria used to perform these important reassessments. Further, we identified concerns related to how the BOP communicates with inmates regarding its process for cutting gang ties (referred to as disassociation) and determined that some inmates may not have sufficient information to avail themselves of this important option. We also identified potentially significant issues with the NGU's gang-affiliation validation and tagging processes, which could have safety implications for some inmates and BOP staff.<sup>4</sup> Lastly, we found that improvements could be made to the NGU's intelligence gathering and information sharing efforts if the BOP takes the necessary steps to develop basic operational guidance and provide advanced training opportunities to NGU staff.

### **(U) Designation of Gangs within the BOP**

(U) At the time of our audit, the BOP did not maintain a formal list of gangs within its institutions. Based on data provided by the BOP from its SENTRY database, BOP program statements, and our identification of groups, gangs, or organizations for which the NGU played a role in the gang validation process or trend monitoring, the OIG identified a total of 82 groups with gang affiliated inmates operating within BOP institutions as of April 2022.<sup>5</sup> After concluding our audit fieldwork and conducting our audit closeout meeting, the BOP informed us that, as of September 2023, it recognizes 77 of the 82 groups we identified based on the BOP's definition of a "gang."

(U) Most of the gangs operating within the BOP are part of a broader population of what the BOP formally refers to as security threat groups (STG). According to BOP policy, an STG is defined as an "inmate group, gang, or organization acting in concert to promote violence, escape, drug, or terrorist activity." An STG designation is advisory in nature and generally does not require enhanced monitoring beyond increased security awareness by BOP staff. For STGs that may require special security measures, such as enhanced monitoring, the BOP may assign a "disruptive group" designation. A disruptive group is an STG subgroup that the BOP has formally certified as posing a threat to security that cannot be managed by routine measures. In contrast, a "management interest group" (MIG) designation is used when a group's presence

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<sup>4</sup> (U) Throughout this audit, BOP staff with whom we spoke used variations of the terms "gang tags" and "inmate tags." In its comments to a draft of this report in June 2024, after nearly 10 months of sensitivity review, BOP informed the OIG for the first time that the terminology used by the staff during our interviews was "slang" and that "gang-affiliated assignments" or "inmate assignments" was the terminology in BOP systems that the staff should have used. The OIG retained in this report the terminology used by the BOP staff when we interviewed them.

<sup>5</sup> (U) For brevity, we refer to these groups as "OIG-identified gangs" or generally as "BOP gangs" throughout this report. A list of the OIG-identified gangs referred to in this report, and their affiliated inmate populations as of April 2022, can be found in Appendix 2.

and activity does not justify an STG designation but leads the BOP to determine there is a need to pay closer attention to the gang or other organized criminal group for affiliation growth and increased activity. As of April 2022, 6 of the 82 OIG-identified gangs were designated by the BOP as disruptive groups and 5 of the 82 were designated by the BOP as MIGs.

(U) During our audit we asked the BOP to provide supporting documentation for the STG-designated gangs we identified. However, we were told by the BOP that it did not retain records of those decisions or the dates they were made. Without this basic information, we were unable to confirm that any of the BOP gangs with the STG designation met the BOP's criteria for an STG, i.e., promoting violence, escape, drug, or terrorist activity at the time they were designated as an STG, or assess the currency of the information that led to the designation.

### **(U) Gang Populations and the Security Threat Group Assessment Process**

(U) During our audit we found that not all of the 82 gangs we identified are significantly represented across the BOP population. As time passes, the severity of the threat posed by specific gangs may change and the influence of one group may grow while that of another may diminish in either influence or membership. Yet, as noted above, once the BOP has made its initial determination to designate a gang as an STG, the NGU does not re-evaluate the decision and is not required to do so by policy.<sup>6</sup> As shown in Table 1 below, inmates affiliated with just 10 gangs accounted for 76 percent (12,890) of active gang affiliates (17,029) in BOP custody, as of April 2022. The remaining 24 percent of gang-affiliated inmates were associated with the remaining 72 gangs.

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<sup>6</sup> (U//LES) While STG designations do not have a periodic reassessment requirement, groups with the "disruptive group" STG subgroup designation are required by the BOP to be [REDACTED] by the Assistant Director for Correctional Programs Division. Management interest groups are required to be [REDACTED] We discuss these requirements in greater detail below.



(U) Table 1

(U) In-Custody Populations for the 10 Most Populous BOP Gangs, as of April 2022

(Gang Names in Table are ~~LAW ENFORCEMENT SENSITIVE~~)

	Name of Gang	Affiliated Inmates as of April 2022
1	██████	2,329
2	██████	2,292
3	██████	2,163
4	██████	1,484
5	██████	1,414
6	██████████████████	1,257
7	████████	554
8	████████	535
9	██████████████████	475
10	██████	387
	Total	12,890

(U) Source: OIG Analysis of SENTRY data

(U) Although the number of gang-affiliated inmates may fluctuate as inmates enter or are released from custody, these 10 groups have maintained relatively consistent affiliation levels since at least September 2021. Further, as shown in Table 2 below, 33 (40 percent) of the 82 OIG-identified gangs had fewer than 25 affiliated inmates in BOP custody, and more than half of these 33 gangs had fewer than 10 affiliated inmates in custody. Two gangs had only one affiliated inmate in BOP custody.

(U) Table 2

(U) BOP Gangs with Fewer than 25 Affiliated Inmates (April 2022)

(Gang Names in Table are ~~LAW ENFORCEMENT SENSITIVE~~)

Gang Name		Affiliates in Custody		Gang Name		Affiliates in Custody	
1	██████	24	18	██████████████		9	
2	██████████	22	19	██████████		9	
3	██████	22	20	██████████		7	
4	██████	21	21	██████		7	
5	██████████	19	22	██████████		7	
6	██████	19	23	██████		6	
7	██████████	18	24	██████		6	
8	██████████	18	25	██████████		6	
9	██████████	16	26	██████		5	
10	██████████	16	27	██████		5	
11	██████████	14	28	██████████		4	
12	██████	13	29	██████████		3	
13	██████	12	30	██████████		3	
14	██████████	12	31	██████████		2	
15	██████████	10	32	██████████		1	
16	██████████	10	33	██████		1	
17	██████	9					

<sup>a</sup> (U) Because these particular groups were identified as gang-affiliated management interest groups, we included them in our overall gang count, as described above.

<sup>b</sup> (U//LES) In February 2023, the ██████████ security designation was elevated to an STG by the BOP.

(U) Source: OIG analysis of BOP data from SENTRY database

(U//LES) Although some STG-designated gangs with very small or decreasing representation within the BOP population may well warrant ongoing monitoring, we nevertheless believe the lack of a formal, periodic reassessment process for STGs has likely resulted in the BOP's universe of gangs being outdated and potentially inflated, which could draw oversight-related resources away from more pressing threats. In fact, we were told by the NGU Unit Chief (Unit Chief) and multiple NGU staff ██████████ ██████████ We agree and believe a formal, periodic reassessment process of the BOP's STGs could reduce or even eliminate the need for the NGU and local BOP staff to focus on certain gangs and gang-affiliated inmates that no longer pose a heightened risk,



thereby allowing it to better focus its limited resources on the gangs and gang-affiliated inmates that present the most significant threats. Although the Unit Chief told us that he had never removed an STG designation and expressed concern that doing so could [REDACTED] or other trends, we believe a formal, periodic reassessment process could account for these risks and allow the BOP to more effectively use its STG designation.

(U) Furthermore, the BOP's current criteria for initially designating STGs are not connected to specific, relevant factors, and there are insufficient documentation requirements to adequately support STG designations. Specifically, we found that the BOP's criteria for formally designating groups at the STG level lacks formal consideration and documentation of explicit factors such as the severity and frequency of a group's activities, types of activities, level of coordination among members, and a group's degree of presence in an institution and throughout the BOP system. We believe the lack of specificity in its criteria for assigning STG status presents the possibility of arbitrary and capricious assignments of formal gang designations without appropriate review.

(U//LES) Following our audit closeout meeting, the BOP stated that its process for designating a gang as an STG includes an evaluation of many factors, including [REDACTED] with other [REDACTED], and [REDACTED]. However, as we state above, during our audit we were told that the BOP does not document or retain any evidence which proves that each of these factors were considered in a consistent manner during the STG decision-making process. Therefore, we recommend that the BOP establish formal controls that require documentation of the specific criteria used for initial STG designations that include factors such as the severity and frequency of the group's criminal activities, level of coordination, and affiliation rates at both an institution and national level. In addition, the established controls should include requirements for periodic and well-documented reassessments of designated STGs.

### **(U) Enhanced Gang-related Security Measures**

(U//LES) As noted above, the BOP may determine that select gangs and their affiliated inmates require additional security measures, such as increased communications monitoring (if they meet BOP criteria) and housing restrictions. One way to apply such enhanced security measures is for the BOP to designate a gang as a "disruptive group", which may trigger measures like [REDACTED].<sup>7</sup> These types of enhanced security measures can result in an increase in the workload of SIS staff because, pursuant to BOP policy, [REDACTED]. Therefore, the BOP must take a thoughtful approach to applying such designations to gangs and affiliated inmates to ensure that it is effectively utilizing its limited resources on the highest risk gangs and that such measures actually contribute to the safety and security of

<sup>7</sup> (U//LES) [REDACTED] Legal mail is not reviewed for its content, although it may be searched for contraband. In March 2020, the OIG issued a report on the [Audit of the Federal Bureau of Prisons' Monitoring of Inmate Communications to Prevent Radicalization](#), Audit Report 20-042 (March 2020), [oig.justice.gov/sites/default/files/reports/a20042.pdf](https://oig.justice.gov/sites/default/files/reports/a20042.pdf). Although the audit primarily focused on terrorist inmates, the OIG found that the BOP did not monitor all high-risk inmate communications, including the communications of gang members on monitoring restrictions, as required, and did not adequately prevent some inmates from circumventing certain communication controls.

its institutions. As we describe in greater detail below, we believe the BOP should improve upon its certification and decertification processes for groups that receive this special status.

***(U) Disruptive Group Certification and Decertification Processes***

(U//LES) BOP policy states that the Assistant Director of the Correctional Programs Division (CPD AD) must formally certify disruptive groups and is required to review those certifications [REDACTED]

(U) Table 3 provides a population comparison of seven gang-related disruptive groups, as April 2022.

**(U) Table 3**

**(U) BOP Gangs Designated as Disruptive Groups (and Affiliated Populations), as of April 2022**

**(Gang Names in Table are ~~LAW ENFORCEMENT SENSITIVE~~)**

Disruptive Group	Year of Initial Certification	Affiliated Population (September 2021)	Affiliated Population (April 2022)
[REDACTED]	1980	51	57
[REDACTED]	1980	66	Removed December 2021
[REDACTED]	2021	Added December 2021	62
[REDACTED]	1980	58	68
[REDACTED]	1997	393	376
[REDACTED]	2018	49	57
[REDACTED]	1981	204	199
<b>Total</b>		820	819

(U) Source: OIG analysis of SENTRY and certification data

(U) For the six gangs designated as disruptive groups, as of April 2022, we asked the NGU to provide us with documentation supporting the certification and recertification of each group for 2019, 2020, and 2021. In response to our request, the NGU provided the approved disruptive group certification proposals that included general statistical data as support for the certification. The statistical data included misconduct rates for several prohibited act categories involving violence, narcotics, alcohol, and telephone misuse. While we are not questioning the NGU's disruptive group certifications, we determined that the documentation provided to us by the NGU for these six disruptive groups lacked sufficient detail to support the designation or even any consistent evidence of an elevated threat from these groups. For example,



although the statistical data presented included all activities and recorded incidents for inmates affiliated with each specific gang, the data did not differentiate between prohibited acts that were gang-related and those that were not attributable to the individual inmate's gang affiliation. Furthermore, the statistical data presented did not make clear whether the activity cited represented an ongoing threat posed by the gang at the time of the review. BOP officials informed us at the time of our audit closeout meeting that the statistics in the disruptive group certification proposals can be impacted by other factors, which may distort their value. We understand these limitations and believe that the BOP should include sufficient detail that provides additional context to the statistical data used in its disruptive group certifications and recertifications.

(U//LES) Additionally, we found what appeared to be some significant inconsistencies in the application of the criteria that is intended to ensure that disruptive group certifications and recertifications are objective and consistent. For example, the 2021 proposal to decertify [REDACTED] as a disruptive group reported a violence rate of 31.67, while the 2021 recertification for [REDACTED] reported a violence rate of 6.25.<sup>8</sup> In fact, the violence rate for [REDACTED] was lower than the violence rate of 6.74 reported for unaffiliated, general population inmates in 2021. Although we offer no opinion on whether these final decertification and recertification decisions for either gang were appropriate, it is important that the BOP document the reasons for these apparent inconsistencies to ensure the [REDACTED] [REDACTED] are applied consistently, and so that appropriate designations are made to promote the safety of BOP inmates and staff.

(U) Furthermore, although the files we reviewed contained statistical data on each of the gangs, the BOP did not provide threat assessments for any of the 2020 or 2021 reviews and the threat assessments we received to support the 2019 recertification reviews were dated in 2017 with no clear explanation as to how the information provided was relevant to potential threats in 2019 or beyond. Overall, we found that BOP policy is unclear about whether a threat assessment, which should be the source of the most detail supporting potential threats, is actually required for each certified disruptive group.

(U//LES) In addition to the lack of supportive documentation for the current disruptive groups discussed above, the BOP was also unable to explain to us the activities that would trigger initial consideration of disruptive group status for a gang that appears to be posing an elevated threat. For example, we asked BOP officials why recent violence involving the Mara Salvatrucha (MS-13) gang that occurred during our audit did not trigger such a review. Specifically, in January 2022, at USP Beaumont, an incident allegedly involving seven inmates affiliated with MS-13 resulted in the murder of two inmates affiliated with the rival Sureños gang. The incident resulted in a 7-day lockdown at all BOP institutions, as well as an additional 17 days of lockdown at select institutions. The ICTB Administrator stated that prior to the January 2022 incident, there were no indications that the MS-13 affiliated inmates within the BOP were [REDACTED]. The BOP believed that the [REDACTED] as a result of a 2019 Attorney General directive, consideration of [REDACTED]

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<sup>8</sup> (U//FOUO) The violence rate reported by the BOP represents the percentage of inmates [REDACTED] that were [REDACTED]. We did not independently verify the violence rates reported by the BOP.

disruptive group status was unnecessary.<sup>9</sup> Further, the BOP told us that because of its policy which requires [REDACTED] in BOP custody, as of April 2022) certifying MS-13 as a disruptive group would have [REDACTED] for the BOP.<sup>10</sup>

(U//LES) We are concerned that the BOP could not articulate clear criteria for which gang activities should trigger consideration for disruptive group status and that important decisions on disruptive group status may be disproportionately impacted by practical considerations, like housing limitations. Therefore, we recommend that the BOP establish formal criteria for activities that should trigger disruptive group consideration and establish clear baseline information, data, and documentation requirements that consider practical limitations such as housing limitations, for formal disruptive group proposals, initial certifications, and [REDACTED]

### ***(U) Emerging Threats and Designation of Management Interest Groups***

(U//LES) As described above, the MIG designation is used when a group's presence and activity does not meet the criteria used for an STG but the BOP sees a need to pay closer attention to the group for affiliation growth and activities that might signal the need to upgrade the designation. In most cases, inmates within a MIG have [REDACTED]

[REDACTED] When an SIS department identifies a group of inmates that it believes it should pay closer attention to as a MIG, an [REDACTED]

[REDACTED] As of April 2022, the BOP data showed that [REDACTED] (with a combined total of [REDACTED] gang-affiliated inmates) had been designated as MIGs.<sup>11</sup> Similar to disruptive groups, MIGs are also required to be reviewed on a regular basis—in this case, [REDACTED]

(U//LES//FOUO) During our audit we asked the BOP to provide us with documentation to support the two most recent reviews of four of these gang-related MIGs. However, we were told by the NGU that even though these gangs were reviewed as required, the reviews were not documented. We confirmed that current BOP policy does not require document retention of [REDACTED] MIG reviews. We find this practice to be problematic because the lack of documented MIG reviews hinders the BOP's ability to assess these groups at a national level for potential trends and elevated risk indicators beyond individual institutions. In fact, as of April 2022, the NGU was only actively observing one of these five MIGs at a national level (which included [REDACTED] gang-affiliated inmates across 18 institutions) while the other four MIGs were being observed by the local institutions housing the gang-affiliated inmates. To ensure the BOP is adequately performing comprehensive assessments of its MIGs, we believe the BOP needs to strengthen its policy surrounding

<sup>9</sup> (U//LES) The former Attorney General directed the Department of Justice, to include the BOP, to address and interdict security threat group activities of MS-13. The BOP's actions included requiring that inmates identified as affiliates of MS-13, regardless of affiliation level, to be placed on [REDACTED] in [REDACTED] It also required that all MS-13 members and associates housed in private contract facilities be redesignated to BOP institutions.

<sup>10</sup> (U//FOUO) According to the BOP, current disruptive groups had a combined total [REDACTED] members and leaders, as of April 2022.

<sup>11</sup> (U//LES) At the conclusion of our audit, the BOP informed us that the [REDACTED] security designation was elevated to an STG in February 2023.



them. Therefore, we recommend that the BOP establish formal controls that require the documentation of specific criteria used for initial designations of management interest groups and subsequent [REDACTED] and further ensure that the NGU considers these designated management interest groups with gang-affiliated inmates as part of its routine intelligence assessments.

**(U) Utilization of NGU Resources**

(U//FOUO) The NGU's cadre of seven Intelligence Officers and seven Intelligence Analysts are each assigned a specific portion of the BOP's portfolio of gangs. As part of their duties, Intelligence Officers and Intelligence Analysts are tasked with, among other things, developing an understanding of their assigned gangs' structures and the connections across the affiliated inmates within the BOP and outside of its confines.<sup>12</sup> They also perform selective communications monitoring and investigate some gang and gang-affiliated activities on an "as needed" basis. The NGU generally [REDACTED], although, as we discuss below, there are no NGU staff members specifically assigned to oversee a significant number of the 82 gangs we identified during our audit. The caseloads assigned to NGU staff varied between [REDACTED] for Intelligence Officers, [REDACTED] for Intelligence Analysts. However, we determined that [REDACTED] the 82 identified gangs had no Intelligence Officer assigned. Although [REDACTED] were assigned to an Intelligence Analyst, the other 12 gangs had no NGU staff assigned to them at all.<sup>13</sup>

**(U) Table 4**

**(U) BOP Gangs without NGU Staff Oversight Assignments as of April 2022**

**(Gang Names in Table are LAW ENFORCEMENT SENSITIVE)**

Name		Population	Name		Population
1	[REDACTED] <sup>b</sup>	3	7	[REDACTED] <sup>b</sup>	58
2	[REDACTED]	4	8	[REDACTED]	18
3	[REDACTED]	5	9	[REDACTED] <sup>a</sup>	35
4	[REDACTED]	2	10	[REDACTED] <sup>b</sup>	27
5	[REDACTED]	1	11	[REDACTED]	6
6	[REDACTED]	7	12	[REDACTED] <sup>b</sup>	16

<sup>a</sup> (U//LES) Includes [REDACTED] that are not otherwise individually designated as an STG.

<sup>b</sup> (U) These groups were designated as MIGs as of April 2022.

(U) Source: OIG analysis of NGU-provided data

<sup>12</sup> (U) Intelligence Officers and Intelligence Analysts share many of the same responsibilities; however, Intelligence Officers are generally stationed at specific BOP institutions and have greater responsibility for approving validations and conducting disassociations, while Intelligence Analysts are stationed at the NGU and are tasked with more research and live monitoring of select inmates. These staffing levels were current as of May 2022.

<sup>13</sup> (U) One gang was partially assigned to an Intelligence Officer, but the oversight assignment was limited to one regional area rather than the gang as a whole.

(U//LES) When we inquired about the lack of NGU oversight for these 12 gangs, BOP officials stated that [REDACTED] were MIGs (as noted above) that were primarily monitored at the institution level. Additionally, BOP officials stated that [REDACTED] other gangs [REDACTED] are primarily monitored by the BOP's Counterterrorism Unit (CTU) due to the groups' affiliations with extremism. For the remaining [REDACTED] gangs without an NGU oversight assignment, the BOP stated that due to the low number of inmates affiliated with these gangs, national oversight by the NGU was not required.

(U) We are concerned about the lack of the NGU's oversight for these 12 gangs. While BOP institutions can monitor gang activities locally and CTU can monitor gang affiliates for terrorism-related activities, only the NGU works to understand the full extent of the gang problem within the BOP at an enterprise level. For example, because CTU is focused on terror-related communications and behaviors, it could miss critical gang-related intelligence among gang affiliates that should be shared with the NGU. Conversely, if CTU relied solely on the NGU to identify terrorist activities among certain gang members, important terrorism-related intelligence could be missed. Therefore, we believe it is important for the NGU, CTU, and local institutions to all apply their unique skillsets and perspectives to best identify and share information about prohibited activities throughout the BOP even if that requires the NGU, CTU, and local institutions to simultaneously monitor certain threat groups of various sizes.

(U) As discussed earlier in the report, we believe these circumstances highlight the need for a periodic, well documented reassessment of the BOP's STGs, and enhancements to existing procedures for the periodic reassessments of disruptive and management interest groups. Once the BOP improves in these areas it should have the information it needs for the NGU to take a more strategic approach to assigning its limited resources to the highest risk gangs. We recommend that the BOP implement a formal strategy for NGU oversight assignments to help ensure there are no gaps in its coverage of the highest risk gangs and strengthen or establish protocols for information and intelligence sharing between the NGU and other BOP entities that may be simultaneously monitoring certain gangs and gang-affiliated inmates for other purposes.

### (U) Gang Affiliation Identification of BOP Inmates

(U) Identifying inmates with affiliations to recognized gangs is a key element in successfully managing gang populations within the BOP. For this important task, the NGU relies on SIS departments at each institution to make initial identifications during the intake process and to forward the information to the NGU for validation.<sup>14</sup> The intake process includes the inmate meeting with the SIS department, during which SIS staff may identify a gang affiliation through an inmate's statements or self-admissions, inmate file and history review, or visual observation of gang-related tattoos. Once an SIS officer identifies a potential affiliation, the officer gathers as much supporting documentation and evidence as possible (which can be a lengthy process) and forwards the information to the NGU to be validated. Validation requests sent by SIS departments are received by the NGU through the BOP's TRUIINTEL. While NGU staff can initiate gang

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<sup>14</sup> (U//LES) Gang affiliation may also be identified while the inmate is incarcerated through [REDACTED] and [REDACTED], and [REDACTED] NGU staff may also make gang identifications through the [REDACTED] and [REDACTED], but in most cases, identification originates at the SIS department level.



identifications through the review of court records and public information, SIS departments generally make the initial identification.

### (U) Inmate Profile Tagging and Validation

(U//LES) The initial identification of gang affiliation is a critical factor in managing gang-affiliated inmates. It is essential to identify inmates with gang affiliation early in their incarceration, or when they start to show signs of affiliation, because the affiliation can affect the inmates' safety and the overall safety and security of BOP institutions, staff, and the inmate population. To facilitate identifying, tracking, and monitoring gang-affiliated inmates, the [REDACTED]

[REDACTED] Once [REDACTED], an inmate's profile in [REDACTED] is updated with a [REDACTED].<sup>15</sup> The tags allow the BOP to manage gang-affiliated inmates—as a group and individually—and alert BOP staff of the affiliations so that proper precautions and security measures are taken. [REDACTED] are also used to identify [REDACTED] who have [REDACTED] from a gang while in BOP custody. The process of “disassociation” is discussed in greater detail below.

(U//LES) The NGU is responsible for validating inmates, which involves reviewing the information submitted by SIS departments and verifying the accuracy of the identification. According to an NGU supervisor, validation requests are processed on a first-come, first-served basis, and are not assigned to any specific NGU staff members.<sup>16</sup> Once received, the [REDACTED]

[REDACTED] <sup>17</sup> Based on their [REDACTED] and the [REDACTED] of the [REDACTED] or [REDACTED] Once a validation is accepted and the affiliation level is determined, the NGU updates the inmate's profiles in SENTRY and TRUINTEL.

<sup>15</sup> (U//LES) These categories of affiliation only apply to organizations classified as a [REDACTED] [REDACTED] are not identified by affiliation status.

<sup>16</sup> (U//LES) The BOP's process for identifying and tracking inmates affiliated with gang-related management interest groups is slightly different than that of the security threat groups, and less formal. To designate an inmate as a management interest group affiliate, SIS staff at institutions [REDACTED] [REDACTED] These groups are generally “tagged” and may be monitored at the local, regional, or national level.

<sup>17</sup> (U//LES) As part of the validation process, which can be lengthy, the BOP determines an inmate's affiliation level by applying [REDACTED]. Evidence of gang affiliation includes self-admission statements, presentencing reports, court documents, photos, tattoos, and other documents showing involvement in gang-related incidents or activities. [REDACTED]

[REDACTED] the BOP has evidence that [REDACTED] The criteria [REDACTED] are documented in BOP Program Statement [REDACTED]

(U) We find the BOP's approach of not assigning validation requests to the NGU staff responsible for overseeing the specified gang as a missed opportunity. As noted above, Intelligence Officers are tasked with developing an understanding of their assigned gangs' structures and the connections across the affiliated inmates within the BOP and outside of its confines. Therefore, we believe the validation process should be performed by the Intelligence Officers with the deepest knowledge of the relevant gang to ensure the most effective determination is made before tagging an inmate with that gang affiliation. We also believe that the information gathered during the validation process may improve an Intelligence Officer's understanding of their assigned gangs' operations, leading to more accurate and consistent determinations, and better intelligence assessments. As part of our recommendation above related to the implementation of a risk-based strategy for NGU oversight assignments, we believe the BOP should strongly consider aligning its validation assignments with the Intelligence Officers' assigned gangs.

(U) Notably, we found that NGU Intelligence Officers may also initiate validation requests on their own if they suspect that an inmate is gang affiliated. Two of the Intelligence Officers we interviewed stated that they did not review their own validation requests, and the Unit Chief stated that such a review would not be permitted. However, we were told that there are no controls in place to prevent Intelligence Officers from reviewing and approving their own validation requests. Although we did not test for, or identify, any instances of an Intelligence Officer improperly initiating and self-approving a validation request, we believe the lack of required management or peer oversight creates the possibility that an inmate could be improperly validated as a gang leader, member, or associate, potentially putting their safety at risk, impacting their housing assignment, or subjecting them to unjustified enhanced monitoring. Therefore, we recommend that the BOP implement a well-documented, independent secondary review requirement for instances in which a validation request is initiated by an NGU staff member instead of an SIS department.

#### ***(U) OIG Review of Validations***

(U//FOUO) To gain an understanding of the volume of gang-affiliated inmate validations that were performed by the NGU, we reviewed the monthly intelligence summary reports for November 2021 through April 2022. As shown in Table 5, the NGU reported that it had validated [REDACTED] as gang-affiliated during that timeframe.



(U) Table 5

## (U) Gang Affiliation Validations by Month for November 2021 through April 2022

(Number of Validations by Month is ~~FOR OFFICIAL USE ONLY~~)

Validation Information	11/2021	12/2021	1/2022	2/2022	3/2022	4/2022	Total
Total Validations by Month	■	■	■	■	■	■	■
Number of Unique Gangs Represented in the Total Validations by Month	■	■	■	■	■	■	■
Number of Validations of Inmates affiliated with one of the Top 10 Most Populous Gangs by Month	■	■	■	■	■	■	■
Percentage of Validations of Inmates affiliated with one of the Top 10 Most Populous Gangs by Month	82 %	74 %	70 %	86 %	80 %	79 %	78 % <sup>b</sup>

<sup>a</sup> (U) Since many gangs have validations in multiple months, the total reflects the number of unique gangs with inmates who were validated as affiliates across this 6-month period.

<sup>b</sup> (U) This value reflects the percentage of all validations completed for affiliates of the top ten gangs across this 6-month period.

(U) Source: NGU data and OIG analysis of NGU Intelligence Summary Reports

(U//~~FOUO~~) Overall, we found that inmates affiliated with the 10 most populous gangs in BOP custody accounted for 78 percent of all validations during this 6-month period. We also found that during the same period, the NGU did not validate a single inmate as an associate, member, or leader of ■ of the 82 gangs we identified. We believe that this may be further indication that the BOP's current population of gangs would benefit from a review and reassessment to determine if limited NGU resources are being directed most effectively. Although the NGU does perform a breakout of validations by gang and some general statistical information in its intelligence summary reports, such as the total year-to-date validation count, we believe that a more robust trend analysis that compares gang growth rates with other key data points like violence rates would allow the BOP to better align its limited resources with its most significant threats. Therefore, we recommend that the BOP require the NGU to conduct an annual analysis that tracks population growth and other key trends within its gang populations so that it can more effectively assign its resources to address the most pressing threats. This recommendation can be implemented in concert with our earlier recommendation that the BOP implement a formal strategy for NGU oversight assignments to better ensure there are no gaps in its coverage of the highest risk gangs.

(U) In addition to reviewing monthly intelligence summary reports, we also performed an in-depth review of 10 randomly selected gang-affiliated inmate files to determine whether their validations were properly supported because validation errors can have a lasting and impactful effect on inmates who may be

improperly validated as gang-affiliated.<sup>18</sup> For example, and as noted above, while in custody, gang-affiliated inmates may be subject to certain housing assignment restrictions and enhanced monitoring requirements. Therefore, an erroneous inmate tag can potentially impact familial ties and visitation opportunities, and misidentified inmates may be at risk for harassment or significant harm by rival gangs. Further, upon release, the NGU provides an inmate's "gang affiliation status" to outside law enforcement through the use of release rosters (described in greater detail below). Therefore, an erroneous gang tag may cause former inmates to undergo unnecessary law enforcement scrutiny after serving their sentence. Lastly, erroneous gang affiliation tags remain attached to inmate profiles and, unless corrected, a re-incarcerated inmate will reenter BOP custody with the erroneous gang affiliation tag, which can lead to the problems noted above.

(U) Through our review of these 10 randomly selected files we found that only half included sufficient evidence to support the validation.<sup>19</sup> In the remaining five files we found:

- (U//FOUO) Inmate #1 was misidentified as a [REDACTED] associate in 2003. When the inmate reentered the BOP in 2016, the erroneous classification was reapplied to the inmate and remained in place until we requested to see the inmate file. The inmate was not affiliated with [REDACTED] or any other gang. Before providing us with the requested information, the NGU corrected the error by removing the STG tag from the inmate's profile in December 2021.
- (U//FOUO) Inmate #2 was validated as a [REDACTED] member in 2021, but the only evidence provided was a presentencing report from 2014, which stated that the inmate was a former member of the gang, not a current member. We requested that the NGU review this inmate's file. Upon review, the NGU agreed that the evidence contained in TRUINTEL did not meet the criteria for the inmate to be considered a member of this gang and subsequently revised the inmate's tag to identify him as an associate of [REDACTED]
- (U//FOUO) Inmate #3 was validated as a [REDACTED] member, but the supporting documentation indicated the inmate's affiliation was with [REDACTED] which is tracked separately by the BOP. Even though the inmate later went through an investigative process and formally disassociated from his gang, the inmate was still recorded as being disassociated from the wrong gang in April 2022.
- (U//LES//FOUO) Inmate #4 was validated as [REDACTED] member, but the inmate's file contained only the presentencing report, which did not provide a sufficient [REDACTED] to support the validation. Nevertheless, after reviewing the inmate's file the BOP maintained the validation despite not having [REDACTED] seemingly in violation of its own criteria.

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<sup>18</sup> (U) Our random sample of 10 gang-affiliated inmates was selected from the BOP's list of 16,687 gang-affiliated inmates, as of September 2021.

<sup>19</sup> (U) Our review was limited to the information and documentation from the file review. We did not make a determination as to how any errors may or may not have impacted the inmate's activities, which may vary across inmates.



- (U//FOUO) Inmate #5 was validated as [REDACTED] member by the BOP, in part, based on claims made by local law enforcement in the presentencing report. However, the presentencing report did not link the inmate specifically to activities of [REDACTED] as required by the BOP's validation criteria. Therefore, we believe the BOP's reliance on the presentencing report to validate this inmate as a member of [REDACTED] was inconsistent with its policy, although it could have been sufficient to validate the inmate as an associate of [REDACTED]

(U) In addition to the errors we identified, an NGU staff member told us that the NGU had similarly identified validation errors through the course of performing its regular duties. Specifically, the NGU staff member stated that they identified and corrected approximately 10 validation errors since starting at the NGU in 2021. In one instance, the staff member identified an inmate who was erroneously validated as a member of both a white supremacist gang and a gang with a predominately black membership.

(U//FOUO) Our review of gang-affiliated tags found more than 250 inmates with multiple gang-affiliated tags in their SENTRY profiles. To determine whether these inmates were correctly validated with all tags applied to their inmate profiles, we asked the NGU to review the list of approximately 250 gang-affiliated inmates we identified. The NGU identified 9 instances where a gang-affiliated tag was misapplied or not supported by the inmate's file. For example, one inmate was validated as an associate of [REDACTED] but he was also entered into SENTRY as a [REDACTED] member in error on the same day. Another inmate was validated as an associate of both [REDACTED] in 2001, but the inmate's file did not contain support for either validation. The BOP corrected these errors and the others it found during the review we requested. Other than individual NGU staff intermittently finding and correcting errors, we found no other evidence of, or procedures for, internal reviews of validation information for accuracy. We recommend that the BOP implement and document within its policies, a quality control system for its validation process that will ensure gang validations meet the validation criteria and are properly supported with documentary evidence.

(U//FOUO) Along with our review of the 10 files above, we also reviewed the SENTRY data provided by the NGU for other anomalies or discrepancies.<sup>20</sup> While analyzing the gang-affiliated inmate list data provided by the NGU, we identified at least two instances where inmates were validated as affiliates of both [REDACTED], two notoriously rival gangs. When we brought this to the BOP's attention, the BOP agreed that the inmates' recorded affiliations with both groups was in error and stated that it had corrected the errors. In response to our request for information on questionable rival gang tags, the BOP identified two other gang affiliation combinations that could warrant further review. We reviewed the data for those highlighted combinations and found one inmate tagged with two of those rival gang tags while another inmate was identified as an affiliate of two gangs that the BOP identified as questionable. Both of these examples indicate that the BOP did not proactively review the inmate data for these gang combinations.

(U//FOUO) We also determined that when the BOP previously revised SENTRY affiliation status categories and gang designation tags it did not take steps to ensure that inmate profiles were appropriately updated, which could lead to inmates not being included in the oversight of the gangs with which they should be tagged as affiliated. Specifically, as of April 2022, we identified 58 gang-affiliated inmates misidentified in

<sup>20</sup> (U) We did not conduct a comprehensive review of SENTRY or TRUINTEL data. Rather, we performed comparisons of a few selected gangs with known rivalries to identify questionable validations and we identified inmates tagged with the suspect tag and the outdated management interest group tags. We did not verify this data with source documentation.

SENTRY through either the discontinued affiliation status category “suspect” or designation tag [REDACTED] as shown in Table 6.

(U) Table 6

(U) Discontinued SENTRY Classification Codes/Tags Still in Use as of April 2022

(Gang Names in Table are LAW ENFORCEMENT SENSITIVE)

SENTRY Entry	Discontinued Date	Misidentified Inmates
Suspect	2009	39
[REDACTED]	September 2020	2
[REDACTED]	September 2020	17
<b>Total</b>		58

(U) Source: OIG analysis of SENTRY data and BOP correspondence

(U//LES) When we asked the BOP about the use of the “suspect” tag, the BOP explained that suspect affiliation status was used similarly to the current associate tag to identify inmates with a suspected gang affiliation until 2009 when TRUIINTEL was created. However, the suspect tag did not have a requirement to document the evidence used to support the application of the tag. In 2009, the use of the suspect SENTRY code was discontinued by the BOP and the profiles of all inmates with the suspect tag were to have been updated. When we highlighted the 39 identified inmates noted above, the BOP recognized that each inmate should now be re-evaluated to determine if they meet the validation criteria as an associate or member. In the case of the discontinued gang-specific SENTRY classification codes applied to the remaining 19 inmates, the BOP explained that the security designation of [REDACTED] was upgraded to a gang-specific STG and that affiliated inmates were to be tagged as affiliates of the new designation, the [REDACTED]. In addition, inmates previously tagged as affiliates of the [REDACTED] were re-tagged as affiliates of the already established [REDACTED] gang. Although the BOP was able to describe why these tags were discontinued, it could not explain why these particular inmate profiles were not updated when they should have been.

(U//LES) Given the importance of tags in identifying and tracking gang-affiliated inmates, we performed a test of the BOP’s system controls related to system access for adding, editing, or otherwise modifying tags through [REDACTED]. According to the BOP, permissions to add, edit, or delete gang-specific designations is provided to select staff members [REDACTED] including its [REDACTED]. Further, [REDACTED] staff members, select [REDACTED] and [REDACTED] are provided with add and edit permissions but are not granted permission to delete gang-specific designations.<sup>21</sup>

<sup>21</sup> (U) The stated access levels are based on information provided by the BOP. We did not perform any system controls testing of access levels for individuals on the list other than the review of deleted entries.



(U) To perform our testing, we asked the BOP to provide us with a list of individuals with permissions to revise or delete access to gang classification codes in SENTRY and TRUINTEL.<sup>22</sup> We then compared this list to a list of all changes to the gang classification field for the period of January 1, 2021, through June 30, 2022, to verify if changes to the classification codes were performed only by authorized individuals. Based on the information provided, we determined that a total of 439 deletions were made to the profiles of gang-affiliated inmates during this period, most of which were made by NGU staff members and others authorized to do so. However, we also found that 12 of the 439 deleted tags (3 percent) were deleted by 5 individuals who should not have permission to edit or delete gang affiliation data. According to the BOP, three of these individuals were Intelligence Designators located at the DSCC and were previously given access to perform these functions. The other two individuals were associated with the Counter Terrorism Unit and the BOP's Trust Fund Branch. The BOP could not provide details on why the individuals were provided this level of access but stated that the permissions to do so were removed when we brought this to their attention. When asked if the BOP took corrective action to ensure that this would not occur again in the future, the ICTB Administrator stated that only select individuals within the ICTB should have permission to delete STG tags so no changes would be made to the to prevent other users who may erroneously have access permissions that are beyond their roles.

(U//LES) We believe the examples of inconsistent use of [REDACTED] and use of [REDACTED] along with evidence that unauthorized individuals were able to [REDACTED] TRUINTEL suggest that the BOP must strengthen its internal controls within these data sources. We recommend that the BOP conduct an assessment of its internal controls in [REDACTED] and TRUINTEL to ensure that [REDACTED] are applied consistently and purged when necessary, and that users of these important data sources cannot alter inmate profiles without the proper permissions.

## (U) Disassociation

(U//LES) Disassociation is a voluntary, but formal BOP process that allows gang-affiliated inmates to disconnect from their gangs. To successfully disassociate, gang-affiliated inmates must [REDACTED]

[REDACTED] When the NGU became operational, it assumed responsibility for processing disassociations, which entails [REDACTED]

[REDACTED] According to the Administrator of the ICTB, most disassociation tasks were consolidated within the NGU to provide more consistency with the process. The NGU also established a [REDACTED], which according to an NGU staff member, previously took up to 1 year to complete prior to the creation of the NGU.

(U//LES) The disassociation process begins when a gang-affiliated inmate [REDACTED]

<sup>22</sup> (U) While the list included over 1,600 users, not all users were unique. More than 300 users were listed more than once and attributed to multiple offices. We identified over 1,300 unique users with access to the TRUINTEL gang tag data.

[REDACTED] staff send the information gathered and any other relevant materials to the NGU.

(U//LES) At the NGU, disassociation requests are reviewed for completeness and for the credibility of the information. If the request is accepted, the inmate's SENTRY and TRUINTEL profiles are updated to [REDACTED]

[REDACTED] Inmates undergoing disassociation are generally [REDACTED]

<sup>23</sup> The purpose of a [REDACTED] from the inmate's autobiographical [REDACTED] is accurate and to obtain additional clarifying information [REDACTED]

[REDACTED] are generally conducted by a [REDACTED]

(U//LES) [REDACTED] the assigned NGU staff members attempt to verify the information provided through [REDACTED] and gather additional information, as needed. Once the analysis is complete, a final report of the [REDACTED] and a recommendation to approve or deny the request is prepared and submitted to the Unit Chief for a final determination. All applicable documentation is supposed to be uploaded into TRUINTEL.

(U//LES) [REDACTED] may be [REDACTED] pending a final determination. According to the BOP's records, [REDACTED] disassociation requests were approved in 2020 and [REDACTED] requests were approved [REDACTED] requests were denied) in 2021, the year the NGU was established. The BOP did not track the number of denied requests before 2021, therefore, we are unable to determine the total number of disassociation requests that were submitted in 2020.

### **(U) OIG Review of Disassociated Inmate Files**

(U//LES) We judgmentally selected a sample of 15 gang-affiliated inmates who had requested disassociation and reviewed their files to determine if the disassociation decisions were sufficiently supported based on the criteria and procedures found in BOP policy.<sup>24</sup> Overall, we found that all 15 of the disassociation files we

<sup>23</sup> (U//LES) Inmates located at institutions where NGU Intelligence Officers are stationed may [REDACTED]

<sup>24</sup> (U//LES) Program Statements [REDACTED] and [REDACTED] *Special Investigative Supervisors Manual*.



reviewed were missing at least one form of documentation required by BOP policy.<sup>25</sup> For 7 of the 15 inmate files, [REDACTED] and are intended to ensure the inmate is aware of the program's expectations, were either not included in the documentation or not signed until after the disassociation process had begun. In addition, in 8 of the 15 sampled files there was no required [REDACTED] or [REDACTED] to show an existing gang-related threat to the inmate attempting to disassociate.

(U) We also found that the required level of verification to determine if an inmate's claim was credible and complete was not evident for any of the 15 disassociation files. For example, BOP policy lists several types of information that should be gathered from the inmate and states that the inmate's responses to questions or requests should be vetted. However, the policy is unclear on what information should be vetted and we found that the majority of information in the final reports showed little evidence of vetting. In one report, the BOP accepted an inmate's description of his involvement in a murder even though court records described significantly more participation in the murder than claimed by the inmate, which may call into question the reliability of any other information the inmate shared. In other reports, affiliated inmates who had been associated with the gang for many years, or attained higher-level positions within the gang, provided almost no specific details on the criminal activity they had engaged in prior to incarceration and were not questioned further to acquire intelligence that could be used or shared within or outside the BOP. In one file we found that an affiliated inmate was approved for disassociation, but instead of a vetted final report the BOP only provided a memorandum from the NGU approving the disassociation with no additional documentation supporting the decision. Lastly, we found that all three of the disassociation requests that were denied by the NGU in 2021 included decision documents that were not signed or dated and included no letterhead or other official markings.

(U) We believe the disassociation process is an important tool for both the BOP and gang-affiliated inmates. This program, if properly implemented, can improve the safety of BOP staff and other inmates, help the BOP meet its mission of assisting incarcerated persons with their transition back into the community, and can also help other law enforcement agencies counter the threat of gangs in their communities. While we make no judgement on the NGU's disassociation decisions, the condition of the 15 disassociation files we reviewed is likely indicative of broader issues with the process and its lack of oversight and adequate quality controls. We recommend that the BOP ensure that existing disassociation files include all required information to support the actions taken and implement mandatory, periodic quality control reviews for all disassociation files that ensure all required information is obtained, analyzed, documented, and subjected to supervisory review so that disassociation decisions are based on complete information and are made in a consistent and objective manner, and that valuable gang-related intelligence is shared with partner agencies. After our audit closeout meeting the BOP told us that it has made numerous changes to correct prior deficiencies in its disassociation documentation process. We applaud the BOP for recognizing that

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<sup>25</sup> (U//FOUO) For the 15 files that were judgmentally selected for the disassociation sample testing, 5 were selected from September 2021 data that listed all [REDACTED] disassociated inmates across the BOP, 5 were selected from a list of [REDACTED] disassociations the NGU performed in 2020 and 2021, and [REDACTED] disassociations that the NGU denied in 2021 were included. In addition, 2 of these 15 disassociation testing files were also part of the 10 files used in the validation testing. None of the [REDACTED] disassociated inmates the NGU listed as [REDACTED] for 2021 were included in the testing.

weaknesses existed in its processes and look forward to the BOP providing evidence of these efforts during the audit resolution process.

### **(U) Notification of Disassociation Option**

(U) Several NGU staff members pointed out that disassociation is a voluntary process and that inmates must request participation. To do so, gang-affiliated inmates must be aware of the process and know how to make a request to disassociate. Yet during our audit, we found that the option to disassociate is not formally shared with BOP inmates. For example, we found no mention of disassociation in the Admissions and Orientation Handbook of 12 different institutions we reviewed.<sup>26</sup> When we asked NGU staff members how gang-affiliated inmates would learn about disassociation, staff told us that information about disassociation is usually spread by “word-of-mouth” or interactions with SIS.

(U) We asked the BOP and NGU officials why gang-affiliated inmates were not formally and proactively informed of the option to disassociate, which could be done through the inmate handbook or during admission and orientation. The ICTB Administrator and Unit Chief both suggested that if the ability to disassociate were made available in writing, gangs might be put on alert and begin to watch for gang-affiliated inmate interactions with SIS or other BOP staff. The ICTB Administrator further implied that disassociation resources could be misdirected by insincere requests filed by inmates hoping to gain something from the process and not with a genuine need or interest in disassociation.

(U) We recognize that every inmate who makes a legitimate attempt at disassociating is assuming an increased risk to their safety, and accordingly, the BOP has security concerns related to the disassociation process. However, we are concerned that the informal, word-of-mouth process currently in use itself could put inmates at risk because interested inmates lacking clarity about the process may contact inappropriate BOP personnel, or more BOP personnel than necessary to share their desire to disassociate and initiate the process. We are also concerned that the lack of communication to inmates about the process may result in fewer inmates pursuing an option that could improve their lives and the safety of BOP institutions. Therefore, we recommend that the BOP consider providing information about the disassociation process in inmate handbooks or through other avenues available to all inmates without singling out any particular inmate or group of inmates. In view of the security concerns associated with the disassociation process raised by BOP personnel we interviewed, the BOP should also consider whether it could improve the process for inmates to make initial inquiries related to disassociation requests so that interested inmates could more safely seek information.

### **(U) Safer Housing**

(U//LES) The BOP generally attempts to mitigate the risks of disassociation by transferring a disassociated inmate to a [REDACTED]<sup>27</sup> [REDACTED] if [REDACTED] may also [REDACTED]

<sup>26</sup> (U) BOP inmates participate in the Admission and Orientation program shortly after arriving at the institution where they are advised of policies, procedures, services, and programs of the facility.

<sup>27</sup> (U) Housing assignments are determined by the BOP’s DSCC. The DSCC stated that it makes housing designations after a review of each inmate’s record and consideration of various factors, such as criminal background, BOP history, affiliations, and security needs.



the BOP finds a verified gang-related risk to the inmate's safety. In these instances, the inmate will be [REDACTED] even though [REDACTED]. Affiliated inmates whose requests for disassociation are denied (after being moved to temporary safe housing), and who were not found to have an elevated gang-related threat risk, are [REDACTED]. The BOP maintains [REDACTED] at a total of [REDACTED] where [REDACTED] may be placed in an attempt to mitigate risks associated with their prior gang.

(U//FOUO) However, in some cases, disassociated inmates may be housed outside of these [REDACTED] designated locations. During our audit, when we asked the BOP how disassociated inmates were protected when housed at institutions without disassociated inmate "yards", the BOP stated that there is no central policy for the protection of inmates, including for disassociated inmates, and that it relies on the individual institutions' policies for protecting inmates. For example, policies may direct the SIS department to conduct a threat assessment or place the at-risk inmate in protective housing. According to the BOP, it is incumbent upon the institutions to recognize that a disassociated inmate is in their population and identify threats that may exist to that inmate.

(U//FOUO) As of April 2022, there were [REDACTED] inmates in custody that were reported to be either inactive or disassociated inmates. Most of these inmates were designated to and housed at institutions with disassociated housing. However, we noted that [REDACTED] gang-affiliated inmates recorded in SENTRY as disassociated or inactive were not at an institution with such facilities.<sup>28</sup> We asked the BOP to explain why these inmates were not placed at one of the institutions with disassociated/inactive inmate housing. The BOP explained that [REDACTED] of these inmates were housed at a transit center while [REDACTED] others were located at institutions that dealt specifically with discipline or safety issues. However, the BOP could only provide us with generalized responses for the remaining [REDACTED] disassociated inmates.

(U) The NGU stated that the DSCC is primarily responsible for housing designations, and it plays no official role in that process. However, in response to a recent OIG report, in September 2023 the BOP issued a new guidance memorandum to DSCC employees, which stated, in part, that "it may be appropriate for DSCC employees to seek a higher level of intelligence review from the National Gang Unit" when placing formerly gang-affiliated inmates in new housing assignments.<sup>29</sup> The September 2023 guidance further states that "the NGU will be consulted prior to designating individuals out of the Administrative Maximum Unit (ADX) who have a gang-related STG assignment." We note that although this policy was not in place when we identified the 100 inmates referenced above, we were told by the DSCC Deputy Assistant Director that, even before the new policy was in place, DSCC designators had regularly consulted with the NGU in instances where a disassociated inmate was being designated to a location without a disassociated inmate yard, and that the DSCC includes documentation of such discussions in the inmate's record.

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<sup>28</sup> (U) We did not perform any testing of the disassociated inmates' files to determine if any had been involved with gang-related incidents after disassociation. Therefore, we cannot determine if the BOP safeguards for disassociated and inactive inmates are sufficient to ensure their safety.

<sup>29</sup> (U) DOJ OIG, *Investigation and Review of the Federal Bureau of Prisons' Handling of the Transfer of Inmate James "Whitey" Bulger*, Report 23-007 (December 2022) [oig.justice.gov/reports/investigation-and-review-federal-bureau-prisons-handling-transfer-inmate-james-whitey](https://oig.justice.gov/reports/investigation-and-review-federal-bureau-prisons-handling-transfer-inmate-james-whitey)

(U) Accordingly, we selected a judgmental sample of seven inmates from the formerly gang-affiliated population noted above, excluding inmates who were housed at a transit center, and reviewed their DSCC files for evidence of any coordination with the NGU. Out of the seven files, we only found documentation of discussions between the DSCC and NGU for one inmate who was being transferred from ADX. For the remaining six files, we found no evidence to support that the DSCC consulted the NGU when making housing designations for the disassociated inmates. In fact, we noted several concerns with what we did find documented for these six inmates. For example, we found:

- (U) One inmate was sent to an administrative facility that was not designated as a yard for disassociated inmates, even though a DSCC senior intelligence designator recommended that the inmate be placed at a medium security disassociated inmate yard.
- (U) One inmate was designated to a high security facility after completing disassociation, but the file did not include any documentation of discussions with either DSCC's own senior intelligence designator or NGU staff to ensure the placement at a high security facility, rather than a disassociated facility, was appropriate.
- (U) One inmate was designated as inactive and remained at the same facility, which was not designated as disassociated housing. However, there was no documentation on file to indicate that a DSCC senior intelligence designator or the NGU was consulted regarding the decision to keep the inmate at the facility in which he was previously a gang member.

(U) We recognize that in certain circumstances it may be necessary for the BOP to designate a disassociated inmate to a location other than one of the eight dissociated inmate yards, and we appreciate that the September 2023 guidance memorandum puts the DSCC on notice that contact with the NGU "may" be necessary in such circumstances. However, dissociated inmates face threats of injury or harm when choosing to disassociate from their former gang. Therefore, we do not believe this policy goes far enough to address the significant risk posed to the disassociated inmate and the BOP when the BOP decides to house a disassociated inmate outside of a safe yard.

(U) In our judgment, the NGU should be in the best position to understand the threat that the new location (without a disassociated yard) may pose, based on its knowledge of certain gang populations, rivalries, and general gang activities across the BOP enterprise. Further, in the absence of clearly documented justification for placing a disassociated inmate outside of a designated safe yard, the BOP could face increased liability should that placement decision lead to an injury or death of a disassociated inmate. Therefore, we believe the BOP must have clear and unambiguous procedures in place when circumstances require the BOP to place a disassociated inmate outside BOP yards reserved for this purpose. We recommend that the BOP require the DSCC to consult with the NGU on all disassociated inmate housing assignments made outside of the institutions with disassociated inmate housing and ensure the consultations and justifications for such placements are well-documented.

### **(U) Gang-Related Intelligence Gathering, Sharing, and Training**

(U//LES) As noted in the Introduction section of this report, one of the key functions of the NGU is gang-related intelligence gathering and dissemination and collaboration with outside law enforcement agencies.



However, the NGU has not established methods or processes for the NGU staff to follow when conducting investigations of potential gang activity or in conjunction with disassociation requests, beyond the general guidance in BOP Program Statements [REDACTED] and [REDACTED]. Further, the NGU did not provide formal training to its new staff members and relied largely on the staff members' prior experience and on-the-job training when standing up the operations of the NGU in January 2021. While some aspects of SIS work and training may relate to the NGU's subject matter expertise needs, NGU staff members also need adequate training to prepare them for broader responsibilities of an intelligence-focused, national unit. However, we found that there is very little management oversight and training to help ensure basic intelligence gathering and sharing efforts are consistent and effective. Instead, the NGU's approach to intelligence gathering and sharing appeared to be entirely dependent on the preferences or knowledge of the individual Intelligence Officers and Intelligence Analysts performing these functions. We believe this ad hoc approach can be improved upon significantly, as we describe in greater detail below.

### **(U) NGU Intelligence Gathering and Information Sharing**

(U//LES//FOUO) According to NGU staff, they can gather gang-related intelligence from a variety of [REDACTED] sources. For example, NGU staff can perform [REDACTED]

[REDACTED] Another method of gathering intelligence is [REDACTED] communications monitoring. As of May 2022, NGU Intelligence Analysts performed live communications monitoring of [REDACTED] gang-affiliated inmates housed in the BOP's Communications Management Units, and selective monitoring of recorded communications for several other gang-affiliated inmates. NGU staff may also review incident reports uploaded into gang-affiliated inmate profiles in TRUINTEL and regularly communicate with SIS departments to obtain information at the institution level.

(U//LES) However, based on our interviews with NGU staff, we found that the level of oversight performed of specific gangs and gang-affiliated inmates was ad hoc and appeared to vary depending on the preferences of the NGU Intelligence Officer or Analyst. For example, some NGU staff told us that they [REDACTED]

[REDACTED] Also of note, during our reviews of disassociation files, we found that some inmates indicated that [REDACTED] – but none of the NGU staff mentioned checking on this type of information for their assigned gangs. We believe each of these examples highlight the need for increased management oversight and formal guidance to help ensure that NGU staff are analyzing the right information in a consistent and effective manner.

(U) In order to better facilitate information sharing, the NGU produces several intelligence products that are developed through its operations, information gathering efforts, and investigative work, which are then shared within the BOP community and with external law enforcement entities. These products include monthly intelligence summary reports, gang threat assessments, SIS advisories, and reports on gang-affiliated inmates scheduled to be released from BOP custody. Although we found that these products appear to provide some helpful information, we also found some areas of concern. For example, we reviewed a formal threat assessment on a particular gang that included generic information about the gang's origin, philosophy, and common gang tattoos but no specific threats. While this information could be

somewhat helpful, references to known specific threats, statistical data on violent activities or trends related to the gang could have proven even more useful.

(U) We also reviewed NGU "Target Summaries," which are reports that are supposed to highlight a single subject and include significant details about the subject inmate, affiliated gang, and activities or events of interests. However, one target summary we reviewed referred to an inmate's correspondence where the inmate promised to retaliate for an assault that was committed against him, but the target summary, which was dated more than 5 months later, did not include the inmate's gang affiliation, evidence that the original assault occurred, or if the threat of retaliation was legitimate. Lastly, we also noted some deviation from practices related to release rosters, which are reports on gang-affiliated inmates who are scheduled for release. According to the individual responsible for compiling and issuing release rosters, information on disassociated and inactive inmates should not be disclosed in these documents, but we noted that the five release rosters we reviewed included disassociated and inactive inmates' release information, potentially putting these newly released inmates at risk, or adversely impacting future interactions with law enforcement. However, at the time of the audit close-out meeting, the BOP stated that release rosters should be accurately reflective of an inmate's status and include needed information for entities like halfway houses and the United States Marshals Service on any inmates deemed a disassociate. The BOP also highlighted that these reports are for law enforcement officers and not disseminated beyond this level, so their concern with including such information in release rosters was minimal.

(U) Overall, we found that the BOP did not have basic operational guidance for these key NGU functions related to intelligence gathering and information sharing. We also found that there are no requirements for NGU products to be reviewed by NGU management prior to release, although at the time of the audit close out meeting, the BOP indicated that all documents scheduled to be released outside of NGU are reviewed by management. Furthermore, we noted that only a few of the reports we reviewed included source documents or other supporting evidence for the factual statements contained within them. Without clear operational guidance the NGU cannot ensure consistency or reliability across the work of NGU staff members perform in these critical areas. Therefore, we recommend that the BOP develop clear guidance for its gang-related intelligence gathering and information sharing operations that include robust management oversight.

### **(U) NGU Specialized Training**

(U) When the NGU became operational in January 2021, most staff members were selected for the new unit from other areas of the BOP, with only one staff member transitioning from its predecessor, the SIU. Most of the current NGU staff members have prior experience as SIS officers, which required attendance at a 2-week SIS training program. However, we believe that the BOP's reliance on past experience and the basic training provided to institutional-level SIS staff members is inadequate for those tasked with running a national, intelligence-focused program. In addition to improved management oversight and the development of formal guidance surrounding these critical intelligence-related functions, we believe NGU staff should receive enhanced, specialized intelligence training that could bolster their ability to serve as the BOP's gang oversight team. The need for enhanced specialized training was echoed by multiple NGU staff members we interviewed.

(U) We asked BOP officials if any additional specialized training was planned for NGU staff. During our audit, we were told by the Unit Chief and the Administrator of the ICTB that there were no current plans for



specialized intelligence-based training for NGU staff members as the NGU was currently focusing on providing training to SIS departments, which had been paused due to the COVID-19 pandemic. Although NGU staff may be in a position to train local SIS departments on local gang-related topics, we are concerned that NGU staff have not been offered the type of training that can help more efficiently run a national, intelligence-focused program. We recommend that the BOP develop a specialized, intelligence-focused training plan for its staff members who are tasked with identifying and disseminating gang-related risks across BOP institutions and among external law enforcement agencies.

(U) After our audit close out meeting, the BOP told us that training options were being explored for ICTB staff and, and that yearly gang conferences have now specifically been identified for NGU personnel. Additionally, the BOP stated that the ICTB enhanced training for all Intelligence Officers and Intelligence Analysts will be implemented once a comprehensive and appropriate program has been identified to serve the needs and intricacies needed for the branch. We look forward to the BOP providing evidence of these training improvements during the audit resolution process.

### (U) BOP Policies and Procedures

(U//LES) As previously mentioned, the primary criteria for NGU operations and the management of gang-affiliated inmates are contained in BOP Program Statements [REDACTED] issued in 2009 and 2016, respectively. Because the NGU was formed in 2021, and the relevant program statements were implemented well before the NGU became operational, the policies are outdated, refer to units no longer in existence, and/or conflict with current NGU and BOP practices. For example, Program Statements [REDACTED] assign responsibilities to SIS departments to [REDACTED]

[REDACTED] However, the NGU has assumed the responsibility for most of these disassociation tasks with SIS departments only performing some preliminary actions. Although SIS departments are not able to complete the disassociation process of an inmate without the NGU's knowledge, we believe these practices as well as others now assigned to the NGU should be developed into clear policies with unambiguous criteria to avoid confusion and ensure that these key processes are performed as intended.

(U) Notably, to inform BOP staff of changes in its disassociation procedures, the NGU developed and provided interim guidance in the form of a memorandum for its staff and SIS departments on the disassociation process. We believe the NGU was proactive when it issued these interim procedures to NGU staff and SIS departments and encourage the BOP to be equally proactive in memorializing all functions performed by the NGU. According to BOP officials, at the time of our audit, updates to formal policies reflecting the NGU's formal responsibilities are still in process without a timeline for completion. Accordingly, we could not assess whether these revised policies and procedures currently under development will adequately address the issues we identified during this audit.<sup>30</sup> Therefore, we believe that

<sup>30</sup> (U) In September 2022, the OIG issued a report on the *Evaluation of the Federal Bureau of Prisons' Policy Development Process*, Report 22-115 (September 2022), [oig.justice.gov/sites/default/files/reports/a20042.pdf](https://oig.justice.gov/sites/default/files/reports/a20042.pdf). In that report, the OIG found that while the BOP has taken recent steps to improve its policy negotiation efforts, it should take additional action to improve the efficiency and effectiveness of its policy development process.



the BOP should complete all policy updates related to the NGU, including the needed changes we identified during our audit, as promptly as possible.

## (U) Conclusion and Recommendations

(U) The creation of the BOP's NGU in January 2021 was an important first step in its efforts to better manage the risks posed by gangs and gang activities within the expansive BOP system. However, we found that since it became operational, the NGU has been working with outdated and, in some cases, inadequate policies and quality control measures. The risks presented by the gangs operating within the BOP system are varied and dynamic, yet the BOP does not conduct any periodic re-assessment of its STGs, which may result in an inefficient use of limited BOP resources intended to counter the gang problem. Furthermore, even in instances where BOP policy requires a periodic reassessment of certain subgroups of gangs, like disruptive and management interest groups, the application of its policies is often inconsistent and, in some cases, contrary to those policies. When it comes to gang-affiliated inmates at the individual level, we are concerned that the critical validation and tagging processes are not being properly applied leaving some inmates at risk of being tied to rival gangs and others not being monitored at all due to outdated tags being applied to them. We also have serious concerns that the BOP's important gang disassociation program may be underutilized and could even put some inmates at risk due to the informal, "word-of-mouth" approach to promoting the program. While we are sensitive to the BOP's security and potential for abuse concerns related to the disassociation program, we believe this important program warrants a reassessment to ensure its safety and efficient implementation. Lastly, the intelligence gathering and information sharing functions of the NGU are critical to its mission. However, we found that the NGU staff generally take an ad hoc approach to their intelligence gathering efforts, which may result in its gang oversight efforts being inefficient and its intelligence sharing efforts being much less effective than they could be. We believe the BOP must enhance its investment in the NGU and provide its staff with clear operational guidance and advanced training opportunities focused on intelligence gathering, information sharing, as well as other skills needed to perform these key mission areas.

(U) We make the following 13 recommendations to the BOP to address these concerns.

(U) We recommend that the BOP:

1. (U) Establish formal controls that require documentation of the specific criteria used for initial STG designations that include factors such as the severity and frequency of the group's criminal activities, level of coordination, and affiliation rates at both an institution and national level. In addition, the established controls should include requirements for periodic and well-documented reassessments of designated STGs.
2. (U//LES) Establish formal criteria for activities that should trigger disruptive group consideration and establish clear baseline information, data, and documentation requirements that consider practical limitations such as housing limitations, for formal disruptive group proposals, initial certifications, and [REDACTED]
3. (U//LES) Establish formal controls that require the documentation of specific criteria used for initial designations of management interest groups and subsequent [REDACTED] and further ensure that the NGU considers these designated management interest groups with gang-affiliated inmates as part of its routine intelligence assessments.

4. (U) Implement a formal strategy for NGU oversight assignments to help ensure there are no gaps in its coverage of the highest risk gangs and strengthen or establish protocols for information and intelligence sharing between the NGU and other BOP entities that may be simultaneously monitoring certain gangs and gang-affiliated inmates for other purposes.
5. (U) Implement a well-documented, independent secondary review requirement for instances in which a validation request is initiated by an NGU staff member instead of an SIS department.
6. (U) Require the NGU to conduct an annual analysis that tracks population growth and other key trends within its gang populations so that it can more effectively assign its resources to address the most pressing threats. This recommendation can be implemented in concert with our earlier recommendation that the BOP implement a formal strategy for NGU oversight assignments to better ensure there are no gaps in its coverage of the highest risk gangs.
7. (U) Implement and document within its policies, a quality control system for its validation process that will ensure gang validations meet the validation criteria and are properly supported with documentary evidence.
8. (U) Conduct an assessment of its internal controls in SENTRY and TRUINTEL to ensure that inmate tags are applied consistently and purged when necessary, and that users of these important data sources cannot alter inmate profiles without the proper permissions.
9. (U) Ensure that existing disassociation files include all required information to support the actions taken and implement mandatory, periodic quality control reviews for all disassociation files that ensure all required information is obtained, analyzed, documented, and subjected to supervisory review so that disassociation decisions are based on complete information and are made in a consistent and objective manner, and that valuable gang-related intelligence is shared with partner agencies.
10. (U) Consider providing information about the disassociation process in inmate handbooks or through other avenues available to all inmates without singling out any particular inmate or group of inmates. The BOP should also consider whether it could improve the process for inmates to make initial inquiries related to disassociation requests so that interested inmates could more safely seek information.
11. (U) Require the DSCC to consult with the NGU on all disassociated inmate housing assignments made outside of the designated institutions with disassociated inmate housing and ensure the consultations and justifications for the placements are well-documented.
12. (U) Develop clear guidance for its gang-related intelligence gathering and information sharing operations that include robust management oversight.



13. (U) Develop a specialized, intelligence-focused training plan for its staff members who are tasked with identifying and disseminating gang-related risks across BOP institutions and among external law enforcement agencies.

## **(U) APPENDIX 1: Objective, Scope, and Methodology**

### **(U) Objective**

(U) The objective of this audit was to assess the Federal Bureau of Prisons' (BOP) management of the National Gang Unit (NGU) and its process for identifying, designating, and tracking incarcerated gang members.

### **(U) Scope and Methodology**

(U) The scope of our audit generally included activities of the NGU and its coordination with SIS departments between January 2021 through July 2022; however, our work incorporated actions, documentation, and data from before this time period when necessary. We determined that there were a total of 82 gangs operating within BOP institutions based on BOP data, BOP policy, and our identification of the groups, gangs, or organizations for which the NGU played a role in the gang validation process or trend monitoring. We also reviewed relevant BOP policies and procedures relating to the identification, monitoring, investigation, and disassociation of gang affiliates. Finally, we reviewed data and information contained in the BOP's data sources, SENTRY and TRUINTEL regarding gang affiliated inmates, and the BOP's processes related to gang-affiliated inmates.

(U) To accomplish the audit objective, we conducted interviews with BOP representatives, including officials from the BOP's Intelligence and Counter Terrorism Branch (ICTB), a senior official from the BOP's Designation Sentencing Computation Center (DSCC), and the BOP's National Gang Unit (NGU) staff members. We reviewed a sample of 10 files for inmates validated as gang associates and members to determine whether staff followed the BOP's policies and procedures. We also reviewed a sample of 15 inmate files, 2 of which were also part of the validation testing, for gang affiliated inmates who participated in the BOP's disassociation program to determine the consistency and extent of the investigations and if the approvals were fully documented and justified in accordance with program criteria. We reviewed seven DSCC files to determine if: (1) the DSCC consulted with the NGU on housing placements for inmates who had disassociated from their gangs but were not being housed at a designated disassociation location and (2) those designations were made in a manner that ensured the safety of the disassociated inmates. In addition to the sample testing, we reviewed the full data set for a variety of errors, including: (1) outdated gang tags, (2) inmates incorrectly tagged as associated with rival gangs, and (3) obsolete tags.

### **(U) Statement on Compliance with Generally Accepted Government Auditing Standards**

(U) We conducted this performance audit in compliance with generally accepted government auditing standards (GAGAS). 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 objective.

### **(U) Internal Controls**

(U) In this audit, we performed testing of internal controls significant within the context of our audit objectives and relied on the information as provided by the BOP to develop an understanding of the NGU

and its operating environment. We did not evaluate the internal controls of the BOP to provide assurance on its internal control structure as a whole. The BOP's management is responsible for the establishment and maintenance of internal controls in accordance with the BOP's program statements and other procedural documentation. Because we do not express an opinion on the BOP's internal control structure as a whole, we offer this statement solely for the information and use of the BOP.<sup>31</sup>

(U) The internal control deficiencies we found are discussed in the Audit Results section of this report. However, because our review was limited to those internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit.

### **(U) Sample-Based Testing**

(U//FOUO) To accomplish our audit objective, we performed sample-based testing to: (1) determine if selected gang-affiliated inmates were correctly validated as a gang affiliate and by status type; and (2) whether the files for selected inmates were complete in documenting disassociations and the final determinations. In this effort, we employed a random sampling design to obtain exposure to inmates from numerous BOP institutions, with a variety of affiliations among various gangs, for validation testing. We selected a random sample of 10 gang-affiliated inmates from the list of 16,687 inmates documented in the September 2021 data provided by the BOP. We used a stratified random sampling approach to conduct testing on disassociation decisions made prior to the NGU and disassociation decisions made by the NGU. For the 13 additional files that were judgmentally selected for the disassociation sample testing, 5 were selected from September 2021 data that listed all [REDACTED] disassociated inmates across the BOP, 5 were selected from a list of [REDACTED] disassociations the NGU performed in 2020 and 2021, and all [REDACTED] disassociations that the NGU denied in 2021 were included. None of the [REDACTED] disassociated inmates the NGU listed as "inactive" for 2021 were included in the testing. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected. We did not verify the contents of the inmate files since we did not have access to the BOP's data sources.

(U) In addition, we performed testing to determine if the DSCC consulted with the NGU when designating disassociated inmates to locations that were not designated disassociation yards. As of April 2022, we identified 100 disassociated inmates who were not housed at a designated disassociation yard. From that universe we excluded 23 disassociated inmates housed at transit facilities and then judgmentally selected 7 disassociated inmates to ensure a cross section of institutional security levels, gangs, STG type, and disassociation status, and reviewed associated files for documentation of discussions or collaboration regarding housing designation decisions.

(U) We also performed a test of the BOP's system controls related to information systems application access for adding, editing, or otherwise modifying tags in TRUIINTEL. For this test we compared a list of over 1,300 BOP individuals with applications permissions to edit or delete gang classification fields and compared those user lists with deleted data for the period of January 1, 2021, through June 30, 2022. We reviewed all the deletions against the user lists but did not verify the accuracy of the user lists, test the user access levels, or verify the deletion data since we did not have access to the BOP's systems.

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<sup>31</sup> (U) This restriction is not intended to limit the distribution of this report, which is a matter of public record.



**(U) Computer-Processed Data**

(U) During our audit, we obtained data from the BOP's data sources, including SENTRY and TRUINTEL. We did not test the reliability of the data sources as a whole, therefore any findings identified involving information from those sources were verified with documentation from other sources.

## (U) APPENDIX 2: OIG-Identified Gangs and Affiliated Populations in BOP Custody as of April 2022

(Gang Names in Table are LAW ENFORCEMENT SENSITIVE)

Gang			Gang			Gang		
		Pop.			Pop.			Pop.
1		9	29		1	57		24
2	<sup>a</sup>	21	30		381	58		12
3	<sup>b</sup>	3	31		69	59		2,292
4	<sup>c</sup>	57	32		16	60		121
5		233	33		9	61	<sup>b</sup>	27
6		170	34		19	62		47
7		61	35		28	63		44
8		30	36		89	64		6
9		13	37		54	65		43
10		137	38		10	66		122
11		7	39		7	67	<sup>c</sup>	58
12		1,257	40		9	68		150
13	<sup>c</sup>	69	41		62	69		14
14		142	42		554	70	<sup>a</sup>	2,163
15		4	43	<sup>b</sup>	58	71		1,414
16		2,329	44		22	72		32
17		19	45		18	73		10
18		5	46		475	74	<sup>c</sup>	199
19		26	47		6	75		12
20		6	48	<sup>c</sup>	68	76		22
21		3	49	<sup>c</sup>	376	77		50
22		2	50		5	78	<sup>b</sup>	36
23		18	51		32	79	<sup>b</sup>	16
24		1,484	52		387	80		535
25		46	53		33	81		1
26		30	54		393	82		31
27		68	55		7	Multiple Affiliations <sup>d</sup>		(196)
28		272	56		35	Total Gang Affiliated Inmates		17,029

<sup>a</sup> (U) Population count includes multiple gang organizations that are classified under one gang.

<sup>b</sup> (U) Management Interest Group

<sup>c</sup> (U) Disruptive Group

<sup>d</sup> (U) The individual gang populations noted in the table include 196 instances in which inmates were affiliated with more than one gang. As a result, we deducted 196 from the total to obtain the total number of inmates with at least one gang affiliation.

(U) Source: OIG Analysis of BOP Data

**(U) APPENDIX 3: The BOP Response to the Draft Audit Report**

U. S. Department of Justice

Federal Bureau of Prisons

Central Office

Office of the Director

Washington, DC 20534

April 4, 2024

MEMORANDUM FOR JASON R. MALMSTROM  
ASSISTANT INSPECTOR GENERAL  
FOR AUDIT

FROM: Colette S. Peters, Director

SUBJECT: Response to the Office of Inspector General's Draft Report: Audit of  
the Federal Bureau of Prisons' Management of the National Gang Unit

(U) The Federal Bureau of Prisons (FBOP) appreciates the opportunity to formally respond to the Office of the Inspector General's (OIG) above-referenced draft report. The FBOP has completed its review and offers the following comments regarding the recommendations. OIG's fieldwork for this audit occurred while the relevant program was undergoing significant changes. We appreciate the work OIG has done to evaluate FBOP's processes regarding national gang unit management. FBOP remains committed to ensuring the safety and security of the individuals in its care and custody.

(U) **Recommendation 1:** Establish formal controls that require documentation of the specific criteria used for initial STG designations that include factors such as the severity and frequency of the group's criminal activities, level of coordination, and affiliation rates at both an institution and national level. In addition, the established controls should include requirements for periodic and well documented reassessments of designated STGs.

(U) **FBOP Response:** FBOP concurs with this recommendation and agrees that formal controls should include: (1) adequate documentation for the initial designation of an STG including the rationale for establishment; and (2) requirements for periodic and well-documented reassessments of designated STGs.

(U) In fact, FBOP has established formal controls for documenting the establishment of a Security Threat Group. Specifically, to establish a new STG, three documents must be completed and reviewed. These include a formal Threat Assessment, which outlines the following: Current status within the FBOP, Executive Summary, Overview, Philosophy, Terminology, Special Skills and/or Tactics, Membership, Structure, & Identifiers, Symbolism,



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any Significant Incidents, and any Additional Information. Additionally, a justification memorandum by the applicable unit Chief, Assistant Administrator and Administrator, as well as an Advisory to field staff will also be completed. These formal controls will continue to be utilized for any forthcoming new STGs and documented accordingly. Additionally, we have established a procedure to conduct a well-documented annual review of all STG assignments.

(U//LES) Recommendation 2: Establish formal criteria for activities that should trigger disruptive group consideration and establish clear baseline information, data, and documentation requirements that consider practical limitations such as housing limitations, for formal disruptive group proposals, initial certifications, and [REDACTED].

(U//LES) FBOP Response: FBOP concurs with this recommendation and is already developing additional criteria for activities that trigger disruptive group consideration along with baseline information, data and documentation requirements for formal proposals, initial certifications, and [REDACTED]. These criteria and the information and documentation requirements for proposals, certifications and recertifications will be provided to relevant FBOP employees.

(U//LES) Recommendation 3: Establish formal controls that require the documentation of specific criteria used for initial designations of management interest groups and subsequent [REDACTED], and further ensure that the [National Gang Unit (NGU)] considers these designated management interest groups with gang-affiliated inmates as part of its routine intelligence assessments.

(U//LES) FBOP Response: FBOP concurs with this recommendation and notes that for [REDACTED] all MIG and STGs have been implemented for each year moving forward, in January and July. The first such review occurred in January 2024. Additional formal controls will continue to be established, developed, and implemented.

(U) Recommendation 4: Implement a formal strategy for NGU oversight assignments to help ensure there are no gaps in its coverage of the highest risk gangs and strengthen or establish protocols for information and intelligence sharing between NGU and other BOP entities that may be simultaneously monitoring certain gangs and gang-affiliated inmates for other purposes.

(U) FBOP Response: FBOP concurs with this recommendation. Relevant here, NGU has already strengthened oversight of STG assignments through additional staff positions to ensure there are no gaps in its coverage. The NGU continues to strengthen protocols for information and intelligence sharing between the NGU and other FBOP entities on gangs/affiliated AICs through intelligence advisories, specialized training development, and continued communication with the field through NGU subject matter experts and management.

(U) Recommendation 5: Implement a well-documented, independent secondary review requirement for instances in which a validation request is initiated by an NGU staff member instead of an SIS department.

(U) FBOP Response: FBOP concurs with this recommendation insofar as it agrees to



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strengthen validation requests by issuing a written directive to NGU staff that will ensure that appropriate protocols are followed. Specifically, individuals who submit validation requests should not also approve those same requests.

(U) **Recommendation 6:** Require the NGU to conduct an annual analysis that tracks population growth and other key trends within its gang populations so that it can more effectively assign its resources to address the most pressing threats. This recommendation can be implemented in concert with our earlier recommendation that the BOP implement a formal strategy for NGU oversight assignments to better ensure there are no gaps in its coverage of the highest risk gangs.

(U) **FBOP Response:** FBOP concurs with this recommendation and will conduct an analysis that tracks population growth and other key trends within its gang populations so that it can more effectively assign its resources to address the most pressing threats.

(U) **Recommendation 7:** Implement and document within its policies, a quality control system for its validation process that will ensure gang validations meet the validation criteria and are properly supported with documentary evidence.

(U//LES) **FBOP Response:** FBOP concurs with this recommendation and will determine a process to conduct an audit of the completed validations and develop a set of procedures regarding the same to ensure gang validations meet the validation criteria and are properly supported with documentary evidence. As noted in response to Recommendation 3, FBOP has already taken steps to enhance its work in this area by implementing [REDACTED] effective January 2024.

(U) **Recommendation 8:** Conduct an assessment of its internal controls in SENTRY and TRUINTEL to ensure that inmate tags are applied consistently and purged when necessary, and that users of these important data sources cannot alter inmate profiles without the proper permissions.

(U) **FBOP Response:** FBOP concurs with this recommendation and notes it has already implemented an annual review of user controls to ensure they are properly assigned.

(U) **Recommendation 9:** Ensure that existing disassociation files include all required information to support the actions taken and implement mandatory, periodic quality control reviews for all disassociation files that ensure all required information is obtained, analyzed, documented, and subjected to supervisory review so that disassociation decisions are based on complete information and are made in a consistent and objective manner, and that valuable gang-related intelligence is shared with partner agencies.

(U) **FBOP Response:** FBOP concurs with this recommendation. The NGU has already revised the disassociation procedures and processes to ensure there are a minimum of three layers of review, prior to the final disposition of the case. The Debrief Coordinator, Deputy Chief and Chief reviewing each case and all associated documentation throughout the approval



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process of each investigative case. FBOP will provide documentation to support these procedures and processes in its next update to facilitate closure of this recommendation.

(U) **Recommendation 10:** Consider providing information about the disassociation process in inmate handbooks or through other avenues available to all inmates without singling out any particular inmate or group of inmates. BOP should also consider whether it could improve the process for inmates to make initial inquiries related to disassociation requests so that interested inmates could more safely seek information.

(U) **FBOP Response:** FBOP concurs with this recommendation and plans to provide information in its next update regarding the disassociation process in the Admission and Orientation handbooks provided to all persons entering into FBOP custody to facilitate closure of this recommendation.

(U) **Recommendation 11:** Require the DSCC to consult with the NGU on all disassociated inmate housing assignments made outside of the designated institutions with disassociated inmate housing and ensure the consultations and justifications for the placements are well-documented.

(U) **FBOP Response:** The FBOP concurs with this recommendation and has already issued updated designation guidance requiring consultation with the NGU on all disassociated AIC housing assignments. The updated guidance was issued on March 20, 2024, and all designators will be trained on the changes. New designators will receive this guidance training along with any other training needed for their new assignment.

(U) **Recommendation 12:** Develop clear guidance for its gang-related intelligence gathering and information sharing operations that include robust management oversight.

(U) **BOP Response:** FBOP agrees that intelligence gathering and information sharing operations should include robust management oversight. FBOP's NGU works closely with the other Intelligence and Counter Terrorism Branch (ICTB) teams in accordance with already established FBOP policy. Accordingly, FBOP concurs with this recommendation insofar as it will continue to align the intelligence gathering and information sharing practices in accordance with the overall ICTB mission. This guidance and oversight will be documented and outline the approval process for all intelligence products and reports.

(U) **Recommendation 13:** Develop a specialized, intelligence-focused training plan for its staff members who are tasked with identifying and disseminating gang-related risks across BOP institutions and among external law enforcement agencies.

(U) **FBOP Response:** FBOP concurs with this recommendation and agrees that a developed and specialized, intelligence-focused training plan for its employees who are tasked with identifying and disseminating gang-related risks across FBOP institutions and among external law enforcement agencies is vital. Additionally, it has identified specialized gang trainings and conferences for its teams to attend annually. NGU employees will continue to identify an intelligence-focused training plan and will continue to participate and present at gang-centric



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conferences and trainings with other law enforcement agencies as available.

## **(U) APPENDIX 4: Office of the Inspector General Analysis and Summary of Actions Necessary to Close the Audit Report**

(U) The OIG provided a draft of this audit report to the BOP. The BOP's response is incorporated in Appendix 3 of this final report. In response to our audit report, the BOP concurred with our recommendations and discussed the actions it will implement in response to our findings. As a result, the status of the audit report is resolved. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

### **(U) Recommendations for the BOP:**

1. (U) Establish formal controls that require documentation of the specific criteria used for initial STG designations that include factors such as the severity and frequency of the group's criminal activities, level of coordination, and affiliation rates at both an institution and national level. In addition, the established controls should include requirements for periodic and well-documented reassessments of designated STGs.

(U) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that it has implemented formal controls when establishing a new STG, which requires documentation, three levels of review, and notification to field staff. The BOP also stated that it established a procedure to conduct a well-documented annual review of all STG assignments. As a result, this recommendation is resolved.

(U) This recommendation can be closed when we receive evidence that the BOP has established, implemented, and utilized these new controls for new STG designations. Specifically, the BOP should provide evidence of documented criteria related to new group threats, supervisory review, and notification to field staff as well as evidence of periodic and well-documented reassessments of established STGs.

2. (U//LES) Establish formal criteria for activities that should trigger disruptive group consideration and establish clear baseline information, data, and documentation requirements that consider practical limitations such as housing limitations, for formal disruptive group proposals, initial certifications, and [REDACTED]

(U//LES) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that it is already developing additional criteria for activities that trigger disruptive group consideration along with baseline information, data and documentation requirements for formal proposals, initial certifications, and [REDACTED]. These criteria and the information and documentation requirements for proposals, certifications and recertifications will be provided to relevant BOP employees. As a result, this recommendation is resolved.

(U//LES) This recommendation can be closed when we receive evidence that the BOP has developed, implemented, and utilized the newly established criteria for activities that trigger disruptive group

consideration along with baseline information, data and documentation requirements for formal proposals, initial certifications, and [REDACTED]

3. (U//LES) Establish formal controls that require the documentation of specific criteria used for initial designations of management interest groups (MIGs) and subsequent [REDACTED] and further ensure that the NGU considers these designated management interest groups with gang-affiliated inmates as part of its routine intelligence assessments.

(U//LES) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that [REDACTED] for all MIG and STGs have been implemented for each calendar year. The first such review occurred in January 2024. Additional formal controls will continue to be established, developed, and implemented. As a result, this recommendation is resolved.

(U//LES) This recommendation can be closed when the BOP provides evidence that it has established, implemented, and utilized formal controls that require the documentation of specific criteria used for initial designations of MIGs and subsequent [REDACTED] and further ensure that the NGU considers these designated MIGs with gang-affiliated inmates as part of its routine intelligence assessments.

4. (U) Implement a formal strategy for NGU oversight assignments to help ensure there are no gaps in its coverage of the highest risk gangs and strengthen or establish protocols for information and intelligence sharing between the NGU and other BOP entities that may be simultaneously monitoring certain gangs and gang-affiliated inmates for other purposes.

(U) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that the NGU has already strengthened oversight of STG assignments through additional staff positions to ensure there are no gaps in its coverage. The NGU continues to strengthen protocols for information and intelligence sharing between the NGU and other BOP entities on gangs/affiliated adults in custody through intelligence advisories, specialized training development, and continued communication with the field through NGU subject matter experts and management. As a result, this recommendation is resolved.

(U) This recommendation can be closed when the BOP provides evidence that it has implemented a formal strategy for NGU oversight assignments to help ensure there are no gaps in its coverage of the highest risk gangs, as well as evidence that it has strengthened or established protocols for information and intelligence sharing between the NGU and other BOP entities that may be simultaneously monitoring certain gangs and gang-affiliated inmates.

5. (U) Implement a well-documented, independent secondary review requirement for instances in which a validation request is initiated by an NGU staff member instead of an SIS department.

(U) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that it agrees to strengthen validation requests by issuing a written directive to NGU staff that will ensure that appropriate protocols are followed. Specifically, individuals who submit validation requests should not also approve those same requests. As a result, this recommendation is resolved.



(U) This recommendation can be closed when we receive evidence that the BOP has implemented a well-documented, independent secondary review requirement for instances in which a validation request is initiated by an NGU staff member.

6. (U) Require the NGU to conduct an annual analysis that tracks population growth and other key trends within its gang populations so that it can more effectively assign its resources to address the most pressing threats. This recommendation can be implemented in concert with our earlier recommendation that the BOP implement a formal strategy for NGU oversight assignments to better ensure there are no gaps in its coverage of the highest risk gangs.

(U) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that it will conduct an analysis that tracks population growth and other key trends within its gang populations so that it can more effectively assign its resources to address the most pressing threats. As a result, this recommendation is resolved.

(U) This recommendation can be closed when we receive evidence that the NGU is required to conduct an annual analysis that tracks population growth and other key trends within its gang populations so that it can more effectively assign its resources to address the most pressing threats. Specifically, the NGU should provide the OIG with a copy of at least the first annual analysis conducted.

7. (U) Implement and document within its policies, a quality control system for its validation process that will ensure gang validations meet the validation criteria and are properly supported with documentary evidence.

(U) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that it will determine a process to conduct an audit of the completed validations and develop a set of procedures regarding the same to ensure gang validations meet the validation criteria and are properly supported with documentary evidence. The BOP also noted in response to Recommendation 3 that the BOP has already taken steps to enhance its work in this area. As a result, this recommendation is resolved.

(U) This recommendation can be closed when we receive evidence that the BOP has developed, implemented, and documented within its policies, a quality control system for its validation process that will ensure that gang validations meet the validation criteria and are properly supported with documentary evidence.

8. (U) Conduct an assessment of its internal controls in SENTRY and TRUINTEL to ensure that inmate tags are applied consistently and purged when necessary, and that users of these important data sources cannot alter inmate profiles without the proper permissions.

(U) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that it has already implemented an annual review of its user controls to ensure they are properly assigned. As a result, this recommendation is resolved.

(U) This recommendation can be closed when we receive evidence that the BOP has conducted an assessment of internal controls in SENTRY and TRUINTEL to ensure that inmate tags are applied consistently and purged when necessary, and that users of these important data sources cannot alter inmate profiles without the proper permissions.

9. (U) Ensure that existing disassociation files include all required information to support the actions taken and implement mandatory, periodic quality control reviews for all disassociation files that ensure all required information is obtained, analyzed, documented, and subjected to supervisory review so that disassociation decisions are based on complete information and are made in a consistent and objective manner, and that valuable gang-related intelligence is shared with partner agencies.

(U) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that the NGU has already revised the disassociation procedures and processes to ensure there are a minimum of three layers of review, prior to the final disposition of the case. Specifically, the Debrief Coordinator, Deputy Chief, and Chief will review each case and all associated documentation throughout the approval process of each investigative case. The BOP added that it will provide documentation to support these procedures and processes in its next update to facilitate closure of this recommendation.

(U) This recommendation can be closed when we receive evidence that the BOP has ensured that existing disassociation files include all required information to support the actions taken and it implements mandatory, periodic quality control reviews for all disassociation files that ensure all required information is obtained, analyzed, documented, and subjected to supervisory review so that disassociation decisions are based on complete information and are made in a consistent and objective manner, and that valuable gang-related intelligence is shared with partner agencies.

10. (U) Consider providing information about the disassociation process in inmate handbooks or through other avenues available to all inmates without singling out any particular inmate or group of inmates. The BOP should also consider whether it could improve the process for inmates to make initial inquiries related to disassociation requests so that interested inmates could more safely seek information.

(U) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that it plans to provide information in its next update regarding the disassociation process in the Admission and Orientation handbooks provided to all persons entering into BOP custody to facilitate closure of this recommendation. As a result, this recommendation is resolved.

(U) This recommendation can be closed when we receive evidence that the BOP has provided information about the disassociation process in inmate handbooks or through other avenues available to all inmates without singling out any particular inmate or group of inmates. The BOP should also provide evidence that it considered ways it could improve the process for inmates to make initial inquiries related to disassociation requests so that interested inmates could more safely seek information. If no changes are made in this regard, the BOP should provide an explanation as to why it concluded that no changes were needed to this process.

- 11. (U) Require the DSCC to consult with the NGU on all disassociated inmate housing assignments made outside of the designated institutions with disassociated inmate housing and ensure the consultations and justifications for the placements are well-documented.**

(U) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that it issued updated designation guidance requiring consultation with the NGU on all disassociated adults in custody housing assignments on March 20, 2024, and that all designators will be trained on the changes. The BOP explained that new designators will also receive this guidance training along with any other training needed for their new assignment.

(U) This recommendation can be closed when the BOP provides evidence of its new requirement for the DSCC to consult with the NGU on all disassociated inmate housing assignments made outside of designated institutions and ensure the consultations and justifications for the placements are well-documented.

- 12. (U) Develop clear guidance for its gang-related intelligence gathering and information sharing operations that include robust management oversight.**

(U) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that it agrees that intelligence gathering and information sharing operation should include robust management oversight, and that the NGU works closely with the other Intelligence and Counter Terrorism Branch (ICTB) teams in accordance with already established BOP policy. The BOP further noted that it will continue to align the intelligence gathering and information sharing practices in accordance with the overall ICTB mission and that this guidance and oversight will be documented and the approval process for all intelligence products and reports will be outlined. As a result, this recommendation is resolved.

(U) This recommendation can be closed when we receive evidence that the BOP has developed, documented, and implemented use of clear guidance for its gang-related intelligence gathering and information sharing operations that includes robust management oversight.

- 13. (U) Develop a specialized, intelligence-focused training plan for its staff members who are tasked with identifying and disseminating gang-related risks across BOP institutions and among external law enforcement agencies.**

(U) Resolved. The BOP concurred with our recommendation. The BOP stated in its response that it agrees that a developed and specialized, intelligence-focused training plan for its employees who are tasked with identifying and disseminating gang-related risks across BOP institutions and among external law enforcement agencies is vital. The BOP added that it has identified specialized gang trainings and conferences for its teams to attend annually and that NGU employees will continue to identify an intelligence-focused training plan and will continue to participate and present at gang-centric conferences and trainings with other law enforcement agencies as available. As a result, this recommendation is resolved.



(U) This recommendation can be closed when we receive evidence that the BOP has developed and implemented a specialized, intelligence-focused training plan for its staff members who are tasked with identifying and disseminating gang-related risks across BOP institutions and among external law enforcement agencies. Specifically, the BOP should provide the training plan, class descriptions, and evidence that applicable current NGU staff have completed the required training.