



**AUDIT OF THE FEDERAL BUREAU OF PRISONS
RESIDENTIAL REENTRY CENTER CONTRACT WITH
BEHAVIORAL SYSTEMS SOUTHWEST, INC.
CONTRACT NO. DJB200038
PHOENIX, ARIZONA**

U.S. Department of Justice
Office of the Inspector General
Audit Division

Audit Report GR-60-13-013
September 2013

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CONTRACT NO. DJB200038
PHOENIX, ARIZONA**

EXECUTIVE SUMMARY*

The Office of the Inspector General (OIG), Audit Division, has completed an audit of the Federal Bureau of Prisons (BOP) Contract No. DJB200038, awarded to Behavioral Systems Southwest, Inc. The purpose of the contract is to operate and manage the Residential Reentry Center (RRC) located in Phoenix, Arizona (Phoenix RRC). A requirements contract was awarded for the Phoenix RRC on September 8, 2010, which had an estimated award amount of over \$13 million for the base period and three option years. Actual costs for the base period and the first option year (through March 31, 2013) were \$6,700,523, as shown in Exhibit 1.

EXHIBIT 1: CONTRACT PERIOD AND COSTS¹

Contract Period	From	To	Estimated Cost	Actual Cost (through 03/31/13)
Base Period	10/01/10	09/30/12	\$ 5,372,850	\$ 5,354,931
Option Year 1	10/01/12	09/30/13	2,719,250	1,345,593
Option Year 2	10/01/13	09/30/14	2,755,750	
Option Year 3	10/01/14	09/30/15	2,792,250	
Total			\$ 13,640,100	\$ 6,700,523

Source: The contract and the list of contract-related expenditures

The BOP utilizes RRCs to transition inmates into communities prior to their release from incarceration. Inmates participating in release programming at RRCs remain in federal custody while serving the remainder of their sentences. At the same time, the inmates are allowed to work, visit with family members, and engage in a limited range of activities. According to the BOP, RRCs provide a structured, supervised environment, along with

* The full version of this report includes information that the Office of the Inspector General considered to be procurement sensitive, and therefore cannot not be publicly released. The Office of the Inspector General believes that disclosure of estimated man-days and per diem rates could impair future negotiations. To create this public version of the report, the Office of the Inspector General redacted these portions of the full report.

¹ Throughout this report, differences between the aggregated costs and totals are due to rounding.

support in job placement, counseling, and other services to facilitate successful reentry into the community after incarceration.

The objective of our audit was to review performance in the following areas: (1) BOP monitoring activities, (2) RRC policies and procedures, (3) RRC personnel, (4) RRC resident accountability, (5) RRC programs and activities, (6) billings, and (7) BOP contract solicitation and award.

In conducting the audit, we obtained an understanding of the contract requirements along with the Phoenix RRC's controls and processes. We reviewed documents and conducted interviews with Phoenix RRC and BOP officials to determine if services were provided in accordance with the contract and if billed costs were accurate. Our audit disclosed that the Phoenix RRC did not always comply with the BOP's Statement of Work (SOW) for RRC operations. Out of the 50 inmates files examined, we found the following:

- For the 15 passes reviewed, 22 accountability checks were not conducted, out of the 82 required (27 percent). We also found nine passes (60 percent) that were incomplete.
- Individualized Program Plans (IPP) were not updated timely for 31 of the 504 (6 percent) IPP updates reviewed.
- Of the 31 inmates employed from our sample of 50 inmates, initial employment verifications were not conducted timely for 3 inmates (10 percent) and 11 of the 80 (14 percent) required subsequent monthly employment verifications we reviewed were not conducted.

Based on the findings related to BOP Contract No. DJB200038, awarded to Behavioral Systems Southwest, Inc., we made three recommendations to the BOP to assist its management and oversight of the contract. These items are discussed in detail in the Findings and Recommendations section of the report. Our audit objectives, scope, and methodology appear in Appendix I.

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INTRODUCTION

The Office of the Inspector General (OIG), Audit Division, has completed an audit of the Federal Bureau of Prisons (BOP) Contract No. DJB200038, awarded to Behavioral Systems Southwest, Inc. The purpose of the contract is to operate and manage the Residential Reentry Center (RRC) located in Phoenix, Arizona (Phoenix RRC). A requirements contract was awarded for the Phoenix RRC on September 8, 2010, which had an estimated award amount of over \$13 million for the base period and three option years. Actual costs for the base period and the first option year (through March 31, 2013) were \$6,700,523, as shown in Exhibit 1.

EXHIBIT 1: CONTRACT PERIOD AND COSTS²

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Option Year 3	10/01/14	09/30/15	2,792,250	
Total			\$ 13,640,100	\$ 6,700,523

Source: The contract and the list of contract-related expenditures

Background

The BOP utilizes RRCs to transition inmates into communities prior to their release from incarceration. Inmates participating in release programming at RRCs remain in federal custody while serving the remainder of their sentences. At the same time, the inmates are allowed to work, visit with family members, and engage in a limited range of activities. According to the BOP, RRCs provide a structured, supervised environment, along with support in job placement, counseling, and other services to facilitate successful reentry into the community after incarceration. Generally, the RRCs operate under the BOP Statement of Work (SOW) for RRC operations.

On September 8, 2010, the BOP awarded Behavioral Systems Southwest, Inc. a requirements contract to operate an RRC in Phoenix, Arizona. The Phoenix RRC is a 95-bed facility housing both male and female inmates. As shown in Exhibit 2, the BOP pays the contractor a per diem rate, which is the price per inmate, per day based on the actual inmate count at the Phoenix RRC.

² Throughout this report, differences between the aggregated costs and totals are due to rounding.

EXHIBIT 2: PAYMENT RATE

Contract Period	Estimated Man-days	Per diem rate	Estimated Costs
Base Period			\$ 5,372,850
Option Year 1			\$ 2,719,250
Option Year 2			\$ 2,755,750
Option Year 3			\$ 2,792,250
Total			\$ 13,640,100

Source: The contract

OIG Audit Approach

The objective of our audit was to review performance in the following areas: (1) BOP monitoring activities, (2) RRC policies and procedures, (3) RRC personnel, (4) RRC resident accountability, (5) RRC programs and activities, (6) billings, and (7) BOP contract solicitation and award.

The results of our audit were based on interviews with essential personnel and documentation provided to us by both the BOP and the Phoenix RRC. Our audit included reviewing inmate files at the Phoenix RRC, as well as the testing of accounting and billing records from the effective date of the contract, October 1, 2010, through November 30, 2012.

FINDINGS AND RECOMMENDATIONS

The Phoenix RRC did not always comply with the criteria outlined in the BOP SOW for RRC operations. Specifically, the Phoenix RRC did not always perform the required number of accountability checks for inmates away on passes, or completely fill out the passes. In addition, the Phoenix RRC did not always update the Individualized Program Plans in a timely manner or complete the required initial or subsequent employment verification of inmates in a timely manner. As a result, the RRC did not adequately monitor the inmates. These issues, as well as other areas covered in our audit, are discussed in detail in the following sections.

Compliance with SOW Requirements

Inmate Security and Accountability

RRCs must be able to locate and verify the whereabouts of inmates at all times. RRCs must contact the inmate either by telephone or in-person at random times at work, at home, or at authorized destinations to maintain accountability. The RRC must conduct these checks at a frequency that ensures accountability and is commensurate with the accountability risks of each individual inmate. RRCs can only authorize an inmate to leave the facility through sign-out procedures and only for an approved program activity. Approved program activities typically include job searches, employment, religious services, and visitations with family and friends. During authorized absences, the RRC is still responsible for inmate accountability.

Pursuant to the SOW, documentation of an inmate's movement in and out of RRCs must include, at a minimum: staff initials, the inmate's full name and register number, type of inmate, time out, destination, purpose, authorized return time, time in, and a section for special comments. Passes may be used by RRCs for approved inmate absences overnight and on weekends. RRCs must make accountability checks for inmates away on passes at least twice a day.

We examined the sign-out logs and passes for all 50 inmates in our sample, which included 15 passes. We found that 22 accountability checks for inmates away on passes were not conducted, out of the 82 required (27 percent). We also found that nine passes (60 percent) were incomplete:

- Nine passes (60 percent) were missing the inmate's return signature.
- Two passes (13 percent) were missing the inmate's estimated return time.
- Two passes (13 percent) were missing the RRC facility director's approval signature.
- One pass (7 percent) was missing the inmate's estimated departure time.
- One pass (7 percent) was missing the inmate's departure signature.
- One pass (7 percent) was missing the inmate's requesting signature.

We discovered no instances of sign-out logs being incomplete.

We recommend that the BOP ensure that the Phoenix RRC comply with SOW requirements to include all required information on passes and perform required accountability checks for inmates away on passes.

Inmate Individualized Program Plans

During an inmate's first 2 weeks at the RRC, the RRC must complete an Individualized Program Plan (IPP) that addresses all of the inmate's needs and includes a timetable for achievement of these goals. During our review of 50 inmate case files, we found that an IPP was missing for 1 inmate (2 percent). The RRC was unable to locate the case file for this inmate. All other information regarding the inmate was located in alternative RRC files. However, the RRC could not locate the IPP and related updates. We discovered no instances of IPPs being conducted after the 2-week deadline.

Additionally, these IPPs must be updated and signed by both the inmate and the inmate's case manager every 2 weeks. During our review of 50 inmate case files, we found the IPPs were not updated timely for 17 inmates. This resulted in 31 late IPP updates, out of 504 IPP updates

reviewed (6 percent). The updates for these IPPs were between 1 and 14 days late, with an average of 3 days late. Of the 31 IPP updates that were late, 15 updates (48 percent) were only 1 day late. The number of late IPPs per inmate ranged from one to five late IPPs. Additionally, the inmate missing the IPP was also missing documentation of all IPP updates.

We recommend that the BOP ensure that the Phoenix RRC comply with SOW requirements to update the inmate IPPs at least every 2 weeks.

Inmate Employment

Inmates are expected to be employed 40 hours a week within 30 calendar days after their arrival at the RRC. The RRC must grant written approval for each job an inmate acquires. The RRC must also verify employment by conducting an on-site visit during the first 7 calendar days of employment. Thereafter, at least monthly, the RRC is required to contact the inmate's employment supervisor by phone or site visit to substantiate attendance and discuss any problems which may have arisen.

During our review of 50 inmate case files, we found that 31 inmates were employed while at the RRC. The required employment verifications were not conducted within 7 calendar days for three inmates (10 percent). These initial employment verifications were between 10 and 30 days late. We discovered no instances of missing initial employment verifications. We also found that the required subsequent monthly employment verifications were not always conducted for three inmates. The number of missing subsequent monthly employment verifications per inmate ranged from two to five missing verifications. In total, 11 subsequent monthly employment verifications were missing, out of 80 required (14 percent). We discovered no instances of missing RRC approvals of inmate employment.

We recommend that the BOP ensure that the Phoenix RRC comply with SOW requirements to verify inmate employment during the first 7 calendar days and at least monthly thereafter.

Inmate Release

RRCs are required to submit a terminal report to the BOP within 5 working days of an inmate's release. During our review of 50 inmate case files, we were unable to locate 2 terminal reports, out of the 52 required (4 percent).

We consider the number of missing terminal reports to be immaterial; therefore, we are not making any recommendations related to this issue.

Inmate Drug Testing

An inmate known to have a history of drug abuse, or who is suspected of illegal drug use, must be tested for illegal substances no less than four times per month. During our review of the 50 inmate case files, we found that 39 inmates were required to be tested for illegal substances while at the RRC. Not all mandatory drug tests were conducted for one inmate. This one inmate was only drug tested two times per month during 2 months of their stay at the RRC. This resulted in 4 missing drug tests out of the more than 700 required drug tests for the 39 inmates in our sample.

We consider the number of missing drug tests to be immaterial; therefore, we are not making any recommendations related to this issue.

Escapes

If an inmate fails to return to the facility at their required time, the RRC must attempt to locate the inmate. Once all efforts to locate the inmate fail, the inmate is considered an escapee. The RRC is then required to contact the BOP Regional Reentry Manager to place the inmate on escape status. Once an inmate is placed on escape status, the RRC must prepare an incident report and conduct a disciplinary hearing. Two inmates from the 50 case files reviewed were placed on escape status. We found that one escapee (50 percent) was not given a disciplinary hearing. We found no instances of missing incident reports for escapees.

We consider the number of missing disciplinary hearings to be immaterial; therefore, we are not making any recommendations related to this issue.

Inmate Vehicle Searches

Inmates may be granted driving privileges. This is normally done for employment purposes. The RRC must conduct searches of inmates' vehicles at least once per month. We found no instances of missing inmate vehicle searches.

Employee Training and Background Checks

The BOP requires all RRC staff to obtain clearance before working with inmates. We reviewed a sample of 15 employee files, as well as the files of the RRC facility director and the 2 Social Services Coordinators. We found no instances of employees working with inmates prior to obtaining clearance.

The BOP requires all RRC staff to attend new employee training, as well as annual refresher training, to inform employees of the rules and regulations related to operating an RRC. We found no instances of employees not attending the required trainings.

Inmate Arrival and Intake

Upon their arrival, inmates are required to be interviewed by RRC staff. In addition, the inmates are also required to sign: (1) an initial intake information form, (2) an acknowledgment of receipt of the RRC's disciplinary policies, and (3) a release of information consent form. Additionally, an acknowledgement of RRC rules and a subsistence agreement form must be completed and kept in the inmate's file. We found no indication that arrival and intake interviews were not conducted or that required documentation was missing.

Billings and Invoices

The BOP pays the contractor a per diem rate, which is the price per inmate, per day based on the actual inmate count at the Phoenix RRC. We compared the RRC billings with the BOP SENTRY database for each month from October 1, 2010, through November 30, 2012, and found no discrepancies in the billings.³

Medical expenses for inmates are paid by the RRC. The RRC requests reimbursement from the BOP during the next monthly billing. Supporting documentation is required to accompany the reimbursement request. We examined all 11 medical reimbursement requests during the audit period and found all contained proper supporting documentation.

³ Developed in-house beginning in the mid-1970s, SENTRY is used to collect, maintain, and report all inmate information that is critical to the safe and orderly operation of the BOP facilities.

Inmate Subsistence

To promote financial responsibility, the BOP requires inmates to make subsistence payments to RRCs each payday to help defray the cost of their confinement. Most inmates are required to pay 25 percent of their gross income, although waivers may be granted. RRCs are responsible for collecting the full subsistence payments due. The RRCs are required to reduce the monthly billings to the BOP by the amount of subsistence payments collected.

Of the 31 inmates in our sample who were employed while at the RRC, we found 1 inmate for whom the RRC did not collect subsistence. This inmate was due to receive their first paycheck on September 24, 2010, and was granted a subsistence waiver by the BOP on October 14, 2010. No records were kept of the inmate's gross pay during these 20 days that the inmate should have paid subsistence. Therefore, we were unable to determine the amount of subsistence that should have been collected.

We consider the number of uncollected subsistence instances to be immaterial; therefore, we are not making any recommendation related to this issue.

Contract Solicitation and Award of Contract

On September 8, 2010, the BOP awarded a contract to Behavioral Systems Southwest, Inc. to provide community-based residential correctional services by operating the Phoenix RRC. These services include employment, inmate development, and other self-improvement opportunities to assist federal inmates during the transition from prison to the community.

The solicitation process used to acquire inmate residential reentry services for Phoenix, Arizona, and the subsequent awarding of the contract to the Phoenix RRC was in accordance with the Federal Acquisition Regulation (FAR). The request for bids was advertised on FedBizOpps.gov as required, and the BOP officials received and evaluated bids in accordance with the FAR.

Monitoring

The BOP is required to conduct regular monitoring of all RRC contractors to ensure compliance with applicable laws, regulations, policies, contract requirements, and to ensure that fraud, waste, abuse,

mismanagement, and illegal acts are prevented, detected, and reported. These monitoring visits include pre-occupancy inspections, unannounced interim monitoring inspections, and annual full monitoring inspections.

We reviewed all four monitoring reports which occurred during the contract period. We found no instances of missing BOP monitoring inspections. We found no repeat deficiencies identified in the monitoring reports. We found that the Phoenix RRC took steps to address deficiencies identified by the BOP.

Recommendations

We recommend that the BOP ensure that the Phoenix RRC complies with the SOW requirements to:

1. Include all required information on passes and perform required accountability checks for inmates away on passes.
2. Update inmate IPPs at least every 2 weeks.
3. Verify inmate employment during the first 7 calendar days and at least monthly thereafter.

OBJECTIVES, SCOPE, AND METHODOLOGY

The objective of our audit was to review performance in the following areas: (1) BOP monitoring activities, (2) RRC policies and procedures, (3) RRC personnel, (4) RRC resident accountability, (5) RRC programs and activities, (6) billings, and (7) BOP contract solicitation and award.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Our audit concentrated on the inception of the contract on September 8, 2010, through November 30, 2012.

We performed sample testing on inmate case files and employee files. In this effort, we employed a judgmental sampling design to verify that SOW requirements were met for all files reviewed. We selected a sample of 50 inmate case files, out of the 851 inmate case files, that were at the RRC during the contract period for Contract No. DJB200038. We also selected a sample of 18 employee case files, out of 81 employee case files, that were at the RRC during the contract period. This non-statistical sample design does not allow projection of the test results to the universe from which the sample was selected.

We also reviewed all billing and invoice records from October 1, 2010, through November 30, 2012. Finally, we reviewed all BOP monitoring reports of the Phoenix RRC from October 1, 2010, through December 31, 2012.

In addition, we verified the Phoenix RRC invoice and payment records against BOP records to assess the accuracy of billings; however, we did not test the reliability of the financial management system as a whole. We determined that the contractor's records were sufficiently reliable to meet the objectives of this audit.

PHOENIX RRC'S RESPONSE TO THE DRAFT REPORT

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cslindholm@behavioralsystemssouthwest.com

August 1, 2013

David M. Sheeren
Regional Audit Manager
Denver Regional Audit Office
Office of the Inspector General
U.S. Department of Justice
1120 Lincoln Street
Suite 1500
Denver, CO 80203

Re: July 25, 2013 Audit Report (#DJB200038)

Mr. Sheeren:

I am in receipt of the July 25, 2013 OIG Audit Report which identified three (3) findings. BSS Phoenix has taken the following corrective action to address the identified findings, as well as to prevent future recurrence.

Finding #1 – Inmate Security and Accountability

Corrective Action:

As of July 25, 2013, all Security staff have been counseled and instructed to ensure that accountability calls made to and from Residents are documented appropriately. The Security Supervisor will inspect accountability calls more closely. Case Service staff have been counseled and instructed to scrutinize each and every pass to ensure that they are completed prior to submitting for approval. The Program Director will also ensure that the passes contain all necessary information before approving.

Finding #2 – Inmate Individualized Program Plans

Corrective Action:

As of July 25, 2013, Assistant Program Directors will conduct random audits on the Bi-Weekly Individual Program Plan Reviews to ensure they are being completed within the required 14 day time frame.

Page Two - OIG Audit Response

Finding #3 – Inmate Employment

Corrective Action:

As of July 25, 2013, the Social Service Coordinator and the Security Accountability Officer have reviewed resident new hire procedures and have made alterations to ensure proper communication for the initial checks. Further, they have created a calendar to ensure that all employed Residents are verified at work as required by the SOW.

Should further information be necessary or if I can answer any further questions, please do not hesitate to call. Thank you for your continued support of BSS Phoenix.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher S. Lindholm", with a horizontal line extending to the right.

Christopher Lindholm
President/COO

FEDERAL BUREAU OF PRISONS' RESPONSE TO THE DRAFT REPORT



U.S. Department of Justice

Federal Bureau of Prisons

Office of the Director

Washington, DC 20534

August 26, 2013

MEMORANDUM FOR DAVID SHEEREN
REGIONAL AUDIT MANAGER
OFFICE OF THE INSPECTOR GENERAL

A handwritten signature in cursive script that reads "Charles E. Samuels, Jr.".

FROM: Charles E. Samuels, Jr.
Director
Federal Bureau of Prisons

SUBJECT: Response to the Office of Inspector General's (OIG)
DRAFT Report: Audit of the Federal Bureau of Prisons
Residential Reentry Center Contract with Behavioral
Systems Southwest, Inc. Contract No. DJB200038
Phoenix, Arizona

The Bureau of Prisons (BOP) appreciates the opportunity to respond to the open recommendations from the draft report entitled Audit of the Federal Bureau of Prisons Residential Reentry Center Contract with Behavioral Systems Southwest, Inc. Contract No. DJB200038 Phoenix, Arizona.

Please find the Bureau's response to the recommendations below:

Recommendation 1: Include all required information on passes and performs required accountability checks for inmates away on passes.

BOP's Response: The Bureau agrees with the recommendation. The Statement of Work (SOW) for this facility requires the contractor to maintain all pertinent information on passes and account for

inmates while they are signed out of the facility. This documentation is monitored by the BOP during contract monitorings of the facility. Previously, the BOP has noted deficiencies and the contractor took appropriate corrective action regarding inmate accountability to include incomplete forms. The Bureau will continue to place emphasis on this area during future monitorings and inspections of the facility. We request that this recommendation be closed.

Recommendation 2: Update inmate IPPs at least every 2 weeks.

BOP's Response: The Bureau agrees with the recommendation. The SOW requires the contractor to update inmate IPPs at least every 2 weeks. This activity is monitored by the Bureau during contract monitorings of the facility. The Bureau will continue to place emphasis on this area during future monitorings and inspections of the facility. We request that this recommendation be closed.

Recommendation 3: Verify inmate employment during the first 7 calendar days and at least monthly thereafter.

BOP's Response: The Bureau agrees with the recommendation. The SOW requires the contractor to verify inmate employment during the first 7 calendar days and at least monthly thereafter. This activity is monitored by the Bureau during contract monitorings of the facility. Previously, deficiencies were noted and the BOP took appropriate action as permitted by the contract regarding inmate employment verification. The Bureau will continue to place emphasis on this area during future monitorings and inspections of the facility. We request that this recommendation be closed.

If you have any questions regarding this response, please contact Sara M. Revell, Assistant Director, Program Review Division, at (202) 353-2302.

**OFFICE OF THE INSPECTOR GENERAL
ANALYSIS AND SUMMARY OF ACTIONS
NECESSARY TO CLOSE THE REPORT**

The OIG provided a draft of this audit report to the BOP and the Phoenix RRC. The responses are incorporated into Appendices II and III of this final report. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

Recommendation Number

- 1. Resolved.** The BOP concurred with our recommendation that it ensure the Phoenix RRC complies with the SOW requirement to include all required information on passes and perform required accountability checks for inmates away on passes. The BOP indicated that it will monitor this requirement during future onsite inspections of the RRC.

In its response, the Phoenix RRC concurred with our recommendation and stated that security and case service staff have been counseled and instructed of this requirement to ensure that accountability checks will be made and all required information will be included on passes. The Phoenix RRC also stated that the Security Supervisor and Program Director will inspect the accountability calls and passes more closely.

This recommendation can be closed when we receive documentation supporting that the BOP has ensured that the Phoenix RRC complies with the SOW requirement to include all required information on passes and perform required accountability checks for inmates away on passes.

- 2. Resolved.** The BOP concurred with our recommendation that it ensure the Phoenix RRC complies with the SOW requirement to update inmate IPPs at least every 2 weeks. The BOP indicated that it will monitor this requirement during future onsite inspections of the RRC.

In its response, the Phoenix RRC concurred with our recommendation and stated that the Assistant Program Directors will conduct random

audits of the bi-weekly IPP updates to ensure they are being completed within the required deadline.

This recommendation can be closed when we receive documentation supporting that the BOP has ensured that the Phoenix RRC complies with the SOW requirement to update inmate IPPs at least every 2 weeks.

- 3. Resolved.** The BOP concurred with our recommendation that it ensure the Phoenix RRC complies with the SOW requirement to verify inmate employment during the first 7 calendar days and at least monthly thereafter. The BOP indicated that it will monitor this requirement during future onsite inspections of the RRC.

In its response, the Phoenix RRC concurred with our recommendation and stated that the Social Services Coordinator and the Security Accountability Officer have reviewed and made alterations to their procedures. The Phoenix RRC further stated that RRC staff have created a calendar to ensure that all employed residents will have their employment verified by the deadlines required by the SOW.

This recommendation can be closed when we receive documentation supporting that the BOP has ensured that the Phoenix RRC complies with the SOW requirement to verify inmate employment during the first 7 calendar days and at least monthly thereafter.