



U.S. Department of Justice

Federal Bureau of Prisons

Office of the Director

Washington, DC 20534

June 12, 2025

MEMORANDUM FOR ALLISON RUSSO
ASSISTANT INSPECTOR GENERAL
EVALUATION AND INSPECTIONS

A handwritten signature in blue ink, reading "William K. Marshall III", is positioned above the printed name of the Director.

FROM: William K. Marshall III, Director

SUBJECT: Response to the Office of Inspector General's (OIG) Report:
Concurrent Inspections of BOP Food Service Operations
(A-2024-007)

The Federal Bureau of Prisons (BOP) thanks the Office of Inspector General (OIG) for its thorough evaluation and appreciates the opportunity to formally respond to the report entitled, "Concurrent Inspections of BOP Food Service Operations (A-2024-007) (Report)."

Food service and safety are top priorities for the BOP. Accordingly, each facility inspected has taken corrective action steps since the site inspections occurred, as summarized below in the section on corrective actions. Additionally, prior to the submission of this response, BOP provided OIG with appropriate documentation of each facility's efforts to correct issues identified during the site inspections.

Furthermore, as noted below, BOP also responds to OIG's findings related to staffing challenges, infrastructure maintenance and repairs that may contribute to the identification of concealed contraband, and the need for upgraded camera systems. BOP values the opportunity to address these additional concerns.

Staffing Shortages

The Report indicates that OIG has previously “reported that staffing shortages and employee allocation are among the chief and longstanding operational challenges that affect safety and security at BOP institutions,” and notes that OIG “identified staffing challenges in the Food Service Departments at all six institutions” inspected.

Appropriately staffing positions is a top priority for the Agency to ensure the well-being of BOP’s dedicated staff and the safety of those in BOP’s care and custody. However, BOP acknowledges that staffing is an ongoing challenge. Over the past ten years, the BOP’s staffing has decreased significantly. In 2014, the BOP employed 19,238 corrections officers. As of February 2025, the BOP employed 15,992 corrections officers. Last year, BOP added nearly 4,000 new hires that, when coupled with about 2,800 separations, left a net gain of almost 1,200 new employees.

That stated, BOP will not permanently resolve the staffing crisis without funding to continue filling vacant positions, increased pay to retain employees, and additional positions to ensure safe staffing levels.

Infrastructure

The Report refers to previous OIG reporting on the BOP’s infrastructure issues which has found that many of the BOP’s physical facilities have infrastructure issues due to a growing list of unfunded maintenance and repair needs.¹

BOP maintains over 46,000 acres of land with more than 3,600 buildings that make up over 120 institutions. BOP has a maintenance and repair backlog of over \$3 billion in unfunded projects. Infrastructure issues present security concerns, like damaged masonry providing opportunities for inmates to conceal contraband, or broken fixtures that can be fashioned into weapons. The failure of these systems not only increases operational costs but also creates vulnerabilities that could endanger the safety of both staff and inmates.

In order to address its infrastructure needs, BOP has developed a comprehensive Five-Year Capital Plan for its major Maintenance and Repair (M&R) projects. This plan is structured to ensure that all critical needs are systematically addressed. The plan is categorized into several key repair categories, each focusing on specific aspects of infrastructure and facility maintenance. By breaking down the repair needs into these specific categories by fiscal year, the BOP’s Five-Year Capital Plan would methodically tackle each area, ensuring that necessary repairs and upgrades are completed in a timely and efficient manner. This structured approach not only addresses immediate repair needs but also supports planning for future maintenance, thereby promoting the long-term sustainability and functionality of the facilities.

¹ Department of Justice Top Management and Performance Challenges 2024. See [Top Management and Performance Challenges Facing the Department of Justice-2024 | U.S. Department of Justice Office of the Inspector General](#).

The prioritization of the Five-Year Capital Investment Plan projects is based on the following criteria:

- Safety system projects (e.g., fire alarm, sprinkler replacement, fire pump, and duress systems projects) are necessary to create a safe environment for both staff and inmates.
- Security projects are necessary to maintain secure institutions to confine inmates and protect the public.
- Infrastructure projects ensure maximum efficiency of the BOP's physical plants, resulting in safe, humane, and secure institutions.
- Bedspace impact projects are crucial to managing the inmate population by identifying and resolving offline bedspace.

Additionally, BOP awarded a contract in August 2023 to assist with creating a facilities masterplan by compiling an analysis of infrastructure requirements and developing methodologies that will provide the funding priorities for critical requirements. The tool is being implemented using current data from the unfunded projects list. The M&R Project Prioritization Framework Tool serves to objectively evaluate outstanding M&R projects by assessing institutional, building, and asset-level data and provides scored and ranked projects by priority of funding. BOP will fully utilize the tool for prioritizing the M&R Capital Investment Plan beginning July 1, 2025.

With respect to the infrastructure issues found during the Food Service site inspections, OIG cites findings including broken water pipes and other water drainage issues resulting in floor damage, but also acknowledges that the facilities took action to address these issues:

- USP McCreary repaired two freezers that were broken at the time of the site inspection, ensuring proper functioning of all three freezers at that facility, and returned the three mobile trailers being used to store frozen food at the time of OIG's site inspection; addressed humid conditions in the kitchen by repairing the ventilation system; repaired/replaced broken floor tiles in the kitchen area; and repaired the cafeteria drain to curtail further water damage.
- FCI Marianna repaired the ventilation system in the kitchen, which was broken during the time of the site inspection and reported that an HVAC project, which was approved on November 12, 2024, is in the acquisition phase for initial solicitation.
- FCC Pollock repaired Food Service freezers and coolers and ensured that they are regularly serviced by the Facilities Department; completed repairs to the air conditioning system by installing new chilled water coils, as of July 26, 2024; and repaired floor tiles in the dishwasher area that were damaged or missing at the time of the site inspection.

- MCC Chicago's kitchen renovation project was completed in November 2024 and included several replacements, such as a pulper unit, hydra extractor, twelve ovens, dishwasher, drainage systems, steam kettles, mixer, and sprinkler heads.
- FCC Allenwood replaced faulty freezer door gaskets to address ice accumulation at the threshold to the freezer in the warehouse.
- FCI Mendota repaired the freezer found inoperable during the time of the site inspection and reported that both of its two food service warehouse freezers are currently operational.

OIG also found that FCI Marianna and FCC Pollock kitchen temperatures were "very hot," noting a temperature of 93 degrees at FCI Marianna and 86 degrees at FCC Pollock. BOP policy describing target temperatures notes that "[a]ll spaces will be maintained as close to the targeted set point as possible," but recognizes that it may be impractical to control temperatures in some spaces, "due to issues such as the age of the cooling and heating systems." See Program Statement 4200.12, Facilities Operations Manual, Ch. 16, Section 4.b., p. 5-6.

Additionally, BOP notes that commercial kitchens, such as those found in restaurants and similar establishments, are generally designed solely for food preparation and not for prolonged human occupancy. Further, the Occupational Safety and Health Administration (OSHA) does not have a specific maximum temperature mandated for kitchens.² Nonetheless, BOP is committed to the safety of staff and the inmates in its custody, and notes that repairs to the cooling systems in the two facilities identified (FCI Marianna and FCC Pollock) are currently underway. Additionally, to mitigate potentially dangerous working conditions, both facilities have developed "Heat Stress Prevention Procedure" documents, which outline procedures to be taken by staff and inmate workers when exposed to elevated temperatures both indoors and outdoors.

Contraband

In its Report, OIG raised concerns regarding non-functioning pallet x-ray machines at FCI Mendota and FCI Marianna and referred to an OIG June 2014 report entitled "Audit of the Federal Bureau of Prisons' September 2011 Procurement of X-Ray Equipment Under Contract GS-07F-0182T" (OIG Audit Report 14-27) ("2014 Report") in which the OIG "identified significant concerns about the BOP's sole reliance on the x-ray machines that it had purchased because of limitations on their ability to identify contraband." Also in the 2014 Report, OIG recommended that "BOP consider conducting periodic and unannounced external testing of the effectiveness of using pallet x-ray machines to prevent the introduction of contraband." OIG acknowledges that, as of January 2015, BOP had successfully implemented all recommendations from the 2014 OIG Report.

While pallet x-ray machines are a tool available to detect contraband, BOP operations do not rely solely on them for this purpose. In practice, more effective methods, such as thorough visual inspections of shipments, have proven more reliable in identifying small or concealed items. This is especially true for dense materials like canned goods and frozen products, where x-ray

² See [Heat - Standards | Occupational Safety and Health Administration](#).

technology often performs inadequately. See Program Statement 4500.12, Trust Fund/Deposit Fund Manual, page 114.

Furthermore, there is no clear evidence that the presence or functionality of pallet x-ray machines significantly reduces the introduction of contraband. In fact, the 2014 Report highlights this limitation, noting that even when the location of concealed contraband was known, it could not be identified through scanned x-ray images. See 2014 Report, p. 10. The 2014 Report further cautions that overreliance on x-ray technology can create a false sense of security and potentially increase the risk of contraband entering the facility if not supplemented by other inspection methods.

OIG also states in its report on the concurrent site inspections that, “[n]otwithstanding the value of manual searches, we believe that pallet x-ray machines can still assist the BOP in preventing the introduction of contraband.” While BOP does not disagree, current BOP policies do not mandate the use of a pallet x-ray machine. See Program Statement 4500.12 and Program Statement 5500.14, Correctional Services Procedures Manual. That stated, although Program Statement 4500.12 does not mandate the use of such machines, the policy explains that pallet x-ray scanners, “[w]hen properly used... effectively supplement other security procedures and prevent and limit the introduction of contraband into Federal Prisons.” See Program Statement 4500.12, p. 113-114.

Security Cameras

While the Report notes that security camera coverage at BOP institutions is a longstanding BOP-wide concern, OIG acknowledges that “BOP has made progress in upgrading camera systems and adding cameras at its institutions.” In its inspections, OIG found that five of the inspected facilities did not have security cameras inside food storage warehouses. However, BOP policy does not require the presence of cameras in food service warehouses, as they are generally outside the facility perimeter. Additionally, inmates who work in Food Service warehouses, outside the secure perimeter of a facility, as was the case in the inspected facilities, are minimum security inmates who routinely live, work, and program with limited supervision, in accordance with security level guidelines and local institutional procedures.³

Corrective Actions Taken by the Six Inspected Facilities

USP McCreary

The Report highlighted several important improvements at USP McCreary's Food Service Department following the site inspection. For example, USP McCreary has addressed concerns regarding understaffing and safety hazards, making the facility a safer and more efficient environment.

³ See Program Statement 5100.08, Inmate Security Designation and Custody Classification, Ch. 2, p. 6: “**OUT CUSTODY**. The second lowest custody level assigned to an inmate requiring the second lowest level of security and staff supervision. An inmate who has **OUT** custody may be assigned to less secure housing and may be eligible for work details outside the institution's secure perimeter with a minimum of two-hour intermittent staff supervision.”

The Food Service Department at USP McCreary was fully staffed as of June 15, 2024, immediately following OIG's site inspection. USP McCreary also implemented 12-hour shifts for Cook Supervisors, guaranteeing the presence of two staff members whenever inmates are working in the kitchen.

Safety has also seen considerable improvement. The Food Service Administrator at the USP ensured an unattended knife that posed a safety risk was removed and all relevant staff received training on proper equipment safety protocols. Additionally, to curtail inmate diversion of food for personal use, USP McCreary has introduced daily area and pat searches by Food Service Department staff.

USP McCreary also made several operational improvements. Two additional freezers are now functional, eliminating dependency on rental trailers and ensuring ample space for frozen food storage. Additionally, racks were installed in the freezers to allow for the proper storing of pallets and reducing the risk of them becoming safety hazards.

The broken walk-in refrigerator, which posed a serious health concern, has been closely monitored, and maintenance staff have been instructed to conduct daily checks for food storage temperatures, recorded on daily temperature logs. This proactive measure has prevented further incidents since the inspection.

Furthermore, the humid kitchen conditions have been improved through repairs to the ventilation system, along with fixing broken floor tiles and a damaged cafeteria drain, all of which were accomplished in 2024 after OIG made the facility aware of these issues.

To tackle sanitation issues and ensure cleanliness remains a top priority, Food Service Department supervisors reminded staff via emails of daily cleaning standards. Lastly, addressing hygiene needs, hand soap has been placed in all restrooms within the Food Service Department, and daily checks are conducted to maintain the supply.

FCI Marianna

Significant advancements have occurred within the FCI Marianna Food Service Department since the time of the site inspection, demonstrating FCI Marianna's proactive approach and commitment to addressing OIG's identified concerns.

Staffing has achieved full capacity with all 18 authorized positions filled as of May 17, 2025.

While OIG previously identified non-operational equipment, including a pallet x-ray scanner, FCI Marianna is actively in the process of obtaining necessary repairs. Critical updates to Food Service equipment have also been made, with all refrigerators and freezers now fully functional following calibration and installation of replacement parts.

Moreover, FCI Marianna has tackled challenges related to ventilation and temperature control. Although air conditioning and ventilation issues were initially flagged, recent repairs, along with

an approved HVAC project, are on the path to resolution. To safeguard staff and inmates from elevated temperatures, FCI Marianna has implemented a robust “Heat Stress Prevention Procedure.”

Lastly, improvements have been made to the Food Service warehouse, with the receiving door now fully operational, enhancing security in operations.

FCC Pollock

The Report identified several critical issues at FCC Pollock that required attention. In response, FCC Pollock has shown a proactive and responsible approach to addressing OIG’s findings.

For example, FCC Pollock promptly addressed an OIG finding that multiple keys had been issued for knife cages, violating BOP policy regarding secure knife storage. Specifically, FCC Pollock addressed this concern by designating a single key set for Food Service access and replacing all knives with safer dough cutters.

Additionally, the inspection revealed temperature control issues in five freezers and two refrigerators, with non-compliance to BOP standards. FCC Pollock has since repaired all five freezers and two refrigerators. FCC Pollock now utilizes TempTrak software for real-time temperature monitoring and maintains temperature logs for 90 days.

OIG also found the air-conditioning system to be inoperable during its inspection. In response to these findings, FCC Pollock completed essential repairs, including new chilled water coils, by July 26, 2024, and created a “Heat Stress Prevention Procedure” to protect staff and inmates from heat-related risks.

Furthermore, OIG noted damaged and missing floor tiles and uncovered electrical boxes in the kitchen area. FCC Pollock responded effectively by patching and leveling the flooring and ensuring all electrical boxes are now properly covered.

Lastly, OIG found broken heating components in mobile food carts used to deliver meals to inmates. FCC Pollock has since installed new heating components on these carts.

MCC Chicago

During OIG’s site inspection, OIG found “the Food Services Department to be clean and did not identify any obvious indications that the food served to inmates was unsafe.” However, OIG did identify operational concerns and MCC Chicago has since made significant strides in enhancing its Food Service Department.

MCC Chicago’s Food Service Departments staffing has now improved from 87% to 100%, ensuring the kitchen operates at peak efficiency.

Furthermore, MCC Chicago successfully completed extensive renovations in November 2024. These upgrades included the installation of modern equipment such as twelve new ovens, a state-

of-the-art dishwasher, new drainage systems, and enhanced safety features like new sprinkler heads.

FCC Allenwood

Since OIG's inspection, FCC Allenwood has made several improvements in the Food Service Department's operations to ensure a secure and well-functioning environment for inmates and staff.

Currently, the Food Service Department boasts a staffing level of 92.6%, with plans to reach 94.44% by June 15, 2025, as an additional staff member is set to start. This increase in staffing is part of ongoing recruitment initiatives targeting both Food Service and entry-level positions.

Addressing safety concerns raised during inspections, FCC Allenwood has implemented searches in areas with drop ceilings in the FCI kitchen, which occur each time inmates are released from the area. While the ceilings remain, these proactive measures help mitigate the risk of contraband being concealed in these spaces. Additionally, FCC Allenwood has successfully tackled ice accumulation issues in the warehouse freezer by replacing faulty door gaskets. Furthermore, clear signage has been posted to remind staff to ensure the cooler door is securely closed, enhancing overall safety and efficiency.

FCI Mendota

During its inspection, OIG did not identify any concerns with unsafe food, however, OIG did note concerns with FCI Mendota's operations, which FCI Mendota has since worked to address.

The Report identified that during the time of the site inspection, the Food Service Department at FCI Mendota was staffed at 70%. However, current staffing levels have improved to 76%, with a commitment to reaching 100% staffing soon. FCI Mendota will continue to post further job announcements to obtain qualified candidates. FCI Mendota believes this dedication to adequate staffing is crucial for maintaining quality service and food safety.

Additionally, during the OIG's inspection, a large piece of sharp metal was discovered atop the locked knife cage in the kitchen area. FCI Mendota has since conducted thorough searches and audits to ensure the safety and accountability of all knives and tools.

Moreover, FCI Mendota's pallet x-ray machine had been non-functional for two years, but progress is being made. Specifically, a technician assessed the machine in May 2025, and parts are on order. In the meantime, FCI Mendota is resourcefully seeking comparable parts from other unused scanners.

Sanitation was another critical focus during the inspection. A dead rodent was found behind the x-ray machine, highlighting the need for better pest control. Monthly inspections are now routine, and additional rodent traps and physical barriers are being installed to enhance FCI Mendota's defense against infestations.

FCI Mendota has also effectively addressed noted safety hazards. Previously, pallets of food in the warehouse freezer were stacked precariously. This issue has been resolved through reorganization, ensuring a safer working environment for both inmates and staff. Additionally, all Food Service Warehouse freezers are operational without reliance on rented units, addressing OIG's concern that only one of the facility's two freezers was operational during the site inspection, resulting in the facility's rental of two frozen-food trailers for food storage.

Finally, only one of the mobile food delivery carts had a functioning heating component at the time of inspection. FCI Mendota has now rectified this concern, with six carts operational and routinely inspected to ensure the carts remain in good working condition.

Conclusion

In conclusion, BOP is appreciative of OIG's inspection and evaluation of its Food Service Departments and values this opportunity to make improvements in its operations as well as demonstrate its commitment to the well-being, safety, and security of both BOP staff and inmates.