



BY THE U.S. GENERAL ACCOUNTING OFFICE
Report To The Attorney General

The Bureau Of Prisons Can Take Certain
Actions To Make Sure Its Correctional Training
Is Both Relevant And Cost Effective

After reviewing certain aspects of the Bureau of Prisons' training programs, GAO believes that

--more firearms training could be provided to employees who are most likely to use weapons;

--the results of the Bureau's self-defense training program need to be assessed; and

--the Bureau should be exploring alternatives to providing centralized training to staff.

In a draft of this report, the Justice was reluctant to GAO's recommendations, did not adequately consider nature of correctional work. GAO has modified certain of its recommendations. GAO does not believe that the comments adequately justify the recommendations entirely.

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UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

GENERAL GOVERNMENT
DIVISION

B-206574

The Honorable William French Smith
The Attorney General

Dear Mr. Attorney General:

We recently reviewed certain aspects of the Bureau of Prisons' training practices. We noted that the Bureau, like other Federal agencies, is facing a time of fiscal constraint and must do the best it can with its available resources.

During our work, we noted that the Bureau's policy is to provide firearms training to nearly all of its employees in three different types of weapons. The Bureau also requires all of its correctional officers to be trained on the carbine even though several of its institutions do not use them. These practices are resulting in certain individuals receiving training they may not need. By changing these practices, the Bureau could make funds available to improve firearms training for employees who have the greatest potential for using weapons.

Two other matters also came to our attention.

--Most of the 57 Bureau employees we interviewed regarding self-defense training were skeptical of their ability to use the techniques being taught. The Bureau needs to assess the results of this program so that it can determine whether changes in its content are necessary.

--The Bureau delivers its correctional training to new employees at a training center. We recognize the advantages of this approach, but because increasing transportation costs and budget restrictions might make centralized training too expensive, other approaches to providing training need to be explored.

Our findings, which are discussed in detail in the following pages, are the result of work performed at the Bureau's Headquarters; its training centers in Atlanta and Denver; the Federal Law Enforcement Training Center in Glynco, Georgia; and selected State and local law enforcement agencies. We also visited eight of the Bureau's correctional institutions. The institutions were selected primarily on the basis of their geographical location,

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but Bureau officials assured us that the training provided at these institutions was similar to that given in others. We also contacted all 42 of the Bureau's institutions to obtain further data on the training that was offered, discussed the Bureau's firearms and self-defense training programs with individuals knowledgeable in those fields, observed training being provided, and interviewed 57 Bureau employees who had received self-defense training. This review was made in accordance with generally accepted Government auditing standards.

The Department of Justice commented on a draft of this report by letter dated July 16, 1982. (See appendix.) Although the Department felt our study was in many respects impressive, it was reluctant to accept any of our recommendations. The Department said that our work did not adequately consider the specialized nature of correctional work or adequately assess the Bureau's new 18 hour basic firearms training course. We have modified some of our recommendations, but we do not believe the Department's comments adequately justify dismissing them entirely.

THE BUREAU'S FIREARMS TRAINING PRACTICES CAN BE IMPROVED

The Bureau's policy of providing firearms training in three different types of weapons to nearly all of its institutional staff has resulted in employees receiving training they may not need. Since many administrative/support employees never use firearms, the need for providing training to the entire group is questionable. Moreover, employees are receiving training in the use of the carbine, a weapon that is not used at some of the Bureau's institutions and has limited utility at others. Changing these practices could result in funds being made available to improve firearms training being provided to employees who have the greatest potential for using weapons.

Consideration should be given to exempting more Bureau employees from firearms training

According to Bureau policy, all new employees except chaplains, doctors, and dentists are to receive from 1/2 to 4 hours of firearms instruction in the use of the revolver, carbine, and shotgun within their first 2 weeks of duty. Also, new employees are sent to the Federal Law Enforcement Training Center in Glynco, Georgia, where they receive an additional 18 hours of basic firearms training as part of a first-year training program designed by the Bureau.

Bureau officials informed us that this policy was implemented because any of its employees could be called upon to serve at an armed post. However, most administrative/support staff receiving firearms training are not assigned armed duties during either normal operations or emergencies. Nineteen of the forty-one institutions responding to our inquiry did not use any of their 2,014 administrative/support staff in this capacity over the 21-month period from October 1979 through June 1981. The remaining 22 institutions reported that they used 521 of their 3,219 administrative/support staff in this capacity. 1/ Of these,

- 190 relieved correctional officers in towers or on perimeter posts,
- 177 provided additional perimeter security during fog alerts,
- 134 were armed to help recapture escapees, and
- 20 helped escort prisoners from one location to another.

In addition to noting that only about 10 percent of the Bureau's administrative support staff at its correctional institutions were assigned armed duties, we found that the need varied considerably among institutions. About 72 percent of the administrative/support staff so assigned came from only nine of the Bureau's institutions. We also noted that when staff were needed, they were frequently taken from departments within the institution that were least affected by service interruptions. For example, 11 of the 13 staff who were so assigned at one institution came from either the education, unit management, or mechanical services departments. Staff from other departments, such as medical services, were seldom used.

Our work clearly shows that administrative/support staff are used to fill gaps created by unusual situations. In view of this, if the Bureau were to provide firearms training to a designated group of administrative/support staff, taking into consideration their work locations and interests, it could meet its needs at

1/Data provided by the institutions did not always permit us to identify specific individuals by type of armed duty. Thus, some persons may have been counted twice. Also, officials at eight of the institutions said they did not maintain records showing the number of administrative personnel used and thus provided us with an estimated figure.

less cost. We discussed this matter with the Director of the Bureau of Prisons, who said that the Bureau was considering making firearms training optional for nurses. We think this action is a step in the right direction and that the Bureau should take a closer look at whether all of the remaining administrative/support staff need weapons training.

All correctional officers may not need to be trained in the use of the carbine

The Bureau could further reduce costs by changing its requirement that all correctional officers be trained in the use of the carbine. This weapon is not used at some of the Bureau's institutions and has only limited utility in others.

Ten of the Bureau's forty-two institutions are minimum security facilities which house inmates convicted of less serious offenses as well as inmates whose sentences are about to expire. Five of these institutions do not have any carbines and officials at four of the remaining five institutions said that although carbines were available, they would not be used. The Bureau's medium security facilities also vary in their use of the carbine. For example, carbines are used primarily in towers to provide long-range shooting capability. But the use of towers is being phased out in one group of medium security facilities. At some other locations, the use of the carbine is further limited because of nearby housing, industry, or highways. Officials at one institution said that the use of the carbine was restricted following complaints from nearby residents whose homes were struck by shots fired at an escapee.

In addition to its prisons, the Bureau operates three metropolitan correctional centers, which are the Federal equivalent of jails. Carbines are not used at these facilities because they are located in heavily populated downtown areas. Even the use of revolvers and shotguns is curtailed at the centers because staff do not pursue escapees. Instead, local police perform this function.

Rather than training every correctional officer in the use of the carbine, the Bureau could require that such training be provided only at the institutions where this weapon is used. Such an approach would provide training for those who needed it as well as more time to teach employees how to use the revolver and the shotgun during their initial training periods.

Changing these practices could
result in improved firearms
training for employees who have
the greatest potential for using
weapons

When the Bureau established its firearms training programs, it took the position that with simple weapons familiarization training, its employees could satisfactorily perform duties involving firearms. Experts we contacted do not agree.

According to officials at the Federal Law Enforcement Training Center, neither the Bureau's localized training nor the Center's centralized 18-hour training course is adequate to provide the proficiency required to safely and effectively use the Bureau's three weapons in a correctional environment. The officials informed the Bureau that the 18 hours the Center provided was not sufficient to adequately train Bureau employees on three weapons. However, the officials said that the Bureau adhered to the 18-hour session, stating that it desired only familiarization training and did not intend to make firearms experts out of its employees.

National Rifle Association officials stated that new correctional employees should receive at least 16 hours of training per weapon, consisting of 8 hours of classroom instruction and a minimum of 8 hours on the firing range. They recommended that 800 rounds be fired with the revolver and 250 rounds each with the carbine and the shotgun. Firearms training experts from the National Rifle Association and State and local law enforcement agencies said that employees with a low level of training not only would lack proficiency but also could be dangerous with weapons. According to these officials, any employee who may be issued a weapon must be trained sufficiently in order to acquire the fundamental skills required to use firearms safely and effectively. They pointed out that anyone who cannot master these skills should not be issued weapons--even in emergencies.

Because the law enforcement profession is one in which proficiency with a firearm is essential, we contacted several of its agencies to compare training practices. As shown by the following table, all of them provided considerably more training than the Bureau on the revolver and the shotgun. On the other hand, the Bureau required that more rounds be shot on the carbine than the only other agency that used it--the Michigan State Police.

Comparison Of Training Hours And Rounds
Fired In Basic Firearms Training Courses
Offered By The Bureau And Other Agencies
Using Firearms

<u>Agency</u>	<u>Ammunition rounds</u>			<u>Total training hours</u>
	<u>revolver</u>	<u>carbine</u>	<u>shotgun</u>	
Bureau of Prisons	150	150	25	18 1/2 - 22
Federal Law Enforcement Training Center	870	N/A	30	<u>a/</u> 28
Michigan State Police	1,000	100	100	56
Detroit Police Department	1,200	N/A	50	48
Cleveland Police Department	1,000	N/A	300	34
Ohio Highway Patrol	600	N/A	50	48

a/The Center is attempting to expand its basic firearms training program to 32 hours to incorporate night firing.

According to training officials at the Federal Law Enforcement Training Center and the National Rifle Association, the Bureau's training program does not prepare its employees for situations in which firearms are likely to be used at a correctional institution. The Bureau's firearms training is lacking pertinent elements such as stress firing, target recognition, judgmental shooting, night firing, shooting at moving targets, and shooting from towers. For example, Bureau employees are not timed when firing rounds either for practice or qualification. Instead, they are allowed to relax and take as much time as they desire to fire each round. According to the firearms experts, this method of shooting can result in higher scores. They also said timing of firing is crucial to developing quick and effective shooting skills. Because it creates stress, timed firing simulates to a degree actual conditions under which firearms may be used. Incidents usually occur suddenly, so employees must be trained to react quickly and effectively with weapons.

The types of firearms training offered in basic courses provided to other Federal agencies by the Federal Law Enforcement Training Center illustrate the gaps that exist in the Bureau's training. In courses offered by the Center, trainees must safely traverse open ground and negotiate obstacles while carrying weapons. They must also demonstrate the ability to fire accurately at specified targets after physical exertion. In other courses, trainees must differentiate between friend and foe targets and deliver accurate shots on multiple targets at varying distances. These courses simulate conditions of escape hunts. Other courses test the trainee's judgment on when to shoot and when not to shoot and also his/her ability to shoot safely and effectively under such subdued lighting conditions as fog or darkness.

Finally, the firearms experts said the Bureau needs to strengthen its scoring procedures. Under the Bureau's present system, each trainee must hit the target with 20 out of 30 shots to successfully pass the revolver and carbine qualification tests. The firearms experts said that because the Bureau's method does not assign numerical value to hits on different parts of the target, it does not reliably indicate a trainee's proficiency with a weapon.

Conclusions

We question whether the Bureau needs to provide firearms training to nearly all of its administrative/support staff. It should assess the needs of each institution and, if backup is needed, it could train a group of administrative/support staff to relieve correctional officers at armed posts and to assist during emergencies. It may also be feasible to eliminate the requirement to train all correctional officers in the use of the carbine. Providing such training to selected individuals at facilities that have a need for this weapon could be a more cost-effective alternative.

Experts from the Federal Law Enforcement Training Center and the National Rifle Association stated that the firearms training provided by the Bureau could be improved. By changing its current practices, the Bureau could make funds available to provide more intensive firearms training to employees who have the greatest potential for using weapons.

Recommendations to the Attorney General

We recommend that you require the Director, Bureau of Prisons, to provide (1) firearms training only to those administrative/support staff who have the greatest potential for using weapons and (2) carbine training only to those correctional staff

who need it. The Director should also consult with firearms experts to determine what improvements to the firearms training program are needed to enable Bureau staff to use firearms more safely and effectively.

Agency comments and
our evaluation

The Department restated its position that all Bureau staff are expected to be fully trained and available to meet a variety of contingencies. We are concerned about whether the Bureau can accomplish this goal with the resources it has available.

The Department points out that the policy of the Bureau is to shoot to wound rather than to kill, indicating to us that the Bureau expects its employees to be able to use a weapon with an extremely high degree of accuracy. At the same time, the Department makes reference to a letter by Mr. Leonard Ross of the Federal Law Enforcement Training Center, which states that the 18 hour firearms program offered by the Center can be considered acceptable to the Bureau's requirements of familiarization with weapons. The letter also states that students who participate in introductory training are able to attain a hit rate on targets of 70 percent. We believe the inconsistency between "policy" and "practice" indicates a need for the Department to reconsider our recommendations. If students can hit somewhere on a stationary target only 70 percent of the time, how can the Bureau be satisfied that all of its employees will have the proficiency to be able to "shoot to wound" during a crisis situation?

One of the Department's criticisms of our draft report is that it is based in part on discussions with Federal Law Enforcement Training Center personnel that were held well before the implementation of the Bureau's 18 hour firearms training course. As a matter of clarification, we held these discussions on September 30, 1981--1 week before the course was scheduled to begin. At that time, the individuals who were going to be teaching the course expressed the view that 18 hours would enable students to become familiar with the Bureau's three weapons, but that this amount of training would not enable the students to safely and effectively use them. On the basis of these discussions and other work that we performed, we looked at the Bureau's introductory firearms training program with a view toward identifying ways in which it could be made more effective within the reality of existing funding constraints.

We did not state that administrative/support staff should not receive firearms training, as is indicated in the Department's comments, but we did question why all such staff except chaplains, dentists, and physicians needed it. We based this on an analysis which showed that only about 10 percent of the

Bureau's institutional administrative/support staff were assigned armed duties for the 21-month period from October 1979 through June 1981 and that the need to use administrative/support staff varied considerably among institutions. We pointed out that an assessment should be made of institutional needs. We stated further that, rather than train everyone, the Bureau should train a group of administrative/support staff to relieve correctional officers at armed posts and to assist during emergencies. We also thought that costs could be cut if the Bureau was more selective in determining who ought to be trained on the carbine. It is true that employees not trained on a carbine might be transferred to institutions where proficiency with the carbine would be needed. But, this problem could be overcome if employees received training at their new site.

Throughout the Department's comments, reference is made to our failing to take into consideration the uniqueness of the correctional environment. We were also reminded that the Bureau's objective is to familiarize its employees with the three types of weapons it uses. We are not questioning whether the Bureau is accomplishing familiarization training. But, we do question whether a person who is only familiar with a weapon can be considered to be fully trained. We consider this question to be valid regardless of the type of environment involved.

It was not our opinion alone, but the opinion of experts that more training was needed. Our recommendations were designed to enable the Bureau to improve the firearms training provided to those employees who have the greatest potential for using weapons. The Bureau's present philosophy of providing familiarization training to everyone does not recognize that certain of its employees are more likely to use weapons than others.

THE BUREAU NEEDS TO ASSESS THE
RESULTS OF ITS SELF-DEFENSE
TRAINING PROGRAM

The self-defense training developed by the Bureau is based on a Japanese martial art known as Aikido. We found indications that the amount of training the Bureau offers its employees does not enable them to become proficient in self-defense skills. Moreover, employees are skeptical of their ability to use this type of self-defense and displayed little interest in practicing it on their own time. We estimate that the Bureau is investing 92,000 hours of staff time annually at a total cost of about \$1 million to provide self-defense training. Since Bureau officials acknowledge that more training is necessary but do not believe they can afford to give it, the Bureau might need to develop a program that would give it a better return on its already substantial investment.

Indications are that the amount of self-defense training provided may not be enough to develop proficiency

The Bureau's training guidelines state that its rationale for providing self-defense training is that employees must have the knowledge and skill necessary to defend themselves and to control violent or uncooperative inmates. The guidelines also state that through the acquisition of Aikido self-defense skills, employees will have confidence in their ability to handle violent inmates, withstand personal attacks, and work effectively in emergency situations.

The underlying philosophy of Aikido is to control the situation in order to avoid a fight--a defensive tactic. It emphasizes holds which are painful only when a person attempts to escape or refuses to follow directions. Eight defensive techniques are taught and, in addition, the student must master five concepts in self-discipline.

Training standards established by the Bureau require that all first-year employees receive 18 hours of Aikido instruction during introductory correctional training. The amount of training given to these new employees before they attend the introductory training course has been left to the discretion of each institution. All employees must take a minimum 4 hour refresher course each year, but correctional officers are required to take an additional 4 hours of Aikido annually.

Information we obtained from martial arts experts, self-defense instructors, both within and outside the Bureau, and Bureau employees indicates that the training hours allotted are simply not adequate to develop proficiency. Collectively, the experts and instructors agreed that many repetitive hours of training are needed to enable someone to use the techniques effectively. In addition, they stated that the mental discipline required to perform the Aikido techniques cannot be achieved in the short time allotted for training. Without the proper mental discipline, skill in any martial art has limited value.

According to martial arts experts, proficiency in the specific techniques the Bureau teaches requires significantly more training than the Bureau provides. One expert with a black belt in Aikido said the techniques have to be used instinctively to be effective and that 18 hours of introductory and 8 hours of annual training are simply inadequate. He stated that if the employee has to think about which technique to use, it is too late to use it. This expert suggested that 104 hours of training a year should be given and expressed the belief that after 6 months of

training with twice weekly practice, most employees would be able to perform the basic techniques well enough to get the job done. Another martial arts expert said the employees should practice 1 hour a day to maintain proficiency in the techniques.

Self-defense instructors we interviewed also agreed the amount of training time allotted was not sufficient. One instructor said that 18 hours of training might be enough to make an employee proficient in one or two of the Aikido techniques, but not all eight. Another stated that it would take about 3 hours of training a week to become proficient in the eight techniques taught by the Bureau. He believed that the survival fighting techniques he teaches to police officers--bits and pieces picked up from the martial arts, boxing, street fighting, etc.--are all geared to actual situations and are easier to teach and learn than the Bureau's techniques. This instructor suggested that the Bureau study assaults on employees for a specified period to determine the most frequent types of attacks and then, with the help of experts, develop techniques to counter them.

Not only did the experts and self-defense instructors believe the amount of training was insufficient but so did Bureau officials and Bureau-certified self-defense instructors. The instructors generally agreed that the amount of training provided is insufficient to expect employees to achieve the program goal of being able to defend themselves and control violent inmates. Some instructors believed the amount of training necessary to achieve this goal was not within the Bureau's resources. Two of the Bureau's instructors readily admitted they could not use the techniques effectively because they simply had not had enough training.

Bureau officials we talked to acknowledged that the amount of time devoted to Aikido self-defense training is insufficient for employees to become skillful and stated that employees are told not to have high expectations when they are introduced to this form of self-defense. More training cannot be given, however, because relief time is not available to allow employees to take it.

Too little training may cause another problem, as described in the following quote from the book Aikido by Massimo N. DiYilladorata.

"Practically speaking, a superficial knowledge of the techniques is in fact worse than no knowledge at all, for this sort of knowledge can only give you a false sense of security which is worse than useless - indeed, downright dangerous - when the real moment comes along to use the techniques."

Most employees interviewed
are skeptical of their ability
to use Aikido self-defense training

Most Bureau employees we interviewed during our visits to institutions questioned their ability to use Aikido and some even questioned the usefulness of the Aikido techniques. Eighty-eight percent believed they needed more training in the use of Aikido techniques, and 70 percent did not believe they could use the skill to subdue a hostile inmate.

Several Bureau employees who had been assaulted commented that their Aikido training was ineffective. One correctional officer said he was not given enough training to become proficient in the techniques taught. He believed that the Bureau should teach methods of disabling an inmate because when an inmate is trying to kill you with a knife, as was the case in this instance, you need to know how to "take out" the inmate. (This employee had 14 hours of introductory training about 3 months prior to the assault.) Another employee who was assaulted said that the attack happened so unexpectedly she did not think about using anything from her prior self-defense instruction. She thought some type of offensive techniques would have been useful if she had received enough training to use them instinctively. (This employee had received 8 hours of self-defense training.) Another correctional officer tried to restrain an inmate in his cell using Aikido techniques but said he was hampered by the close quarters. This officer believes the techniques are ineffective when used in confined areas. He said that during this struggle, assisted by two other staff, he tried to use two Aikido holds but was unsuccessful in applying them. He reverted to what he knew best--a wrestling hold--to subdue the inmate. He believed he would need a great deal more training to use the techniques effectively and said that until then, he would rely on his own method of physically restraining inmates. (This employee received 24 hours of self-defense training).

The employees we interviewed did not appear to be interested in learning the techniques. Eighty-four percent told us they did not practice on their own, and at a class we attended, only 1 of the 15 employees appeared to be highly motivated and intent on learning. Even though all the employees had at least 8 hours of prior Aikido training (some had as much as 16 hours), it appeared that they were not proficient in its use, displayed little interest in learning, and probably could not use the techniques to defend themselves. The training coordinator at this particular institution agreed with our observations.

During the class break, employees made numerous negative comments about the usefulness of Aikido. The employees' negative

attitudes will increase the learning difficulty of the task; if employees believe the techniques are not useful, they will have little interest in the program and get little out of it.

Conclusions

The Bureau should be providing self-defense training that employees can feel confident about and can use effectively. Since most employees we interviewed are skeptical of their ability to use Aikido and are generally not practicing it on their own, we believe the Bureau needs to assess the results of this program so that it can determine whether changes are necessary.

Recommendation to the Attorney General

We recommend that you require the Director of the Bureau of Prisons to determine whether employees are successfully using Aikido when they are faced with dangerous situations. If, as indicated by our review, employees have little confidence in Aikido, we recommend that the Bureau either modify its existing program or develop some other self-defense technique.

Agency comments and our evaluation

Our original proposal to the Attorney General involved changing the current self-defense training program. In commenting on it, the Department stated that it believes that the Bureau's 18 hour basic self-defense program provides adequate training for new employees, enables them to act defensively in dealing with violent persons, and is consistent with the Bureau's responsibility to provide a safe and humane environment for staff and inmates.

We question whether the program provides a sufficient amount of practice in the eight defensive techniques being taught to support the Department's beliefs. Granted, the martial arts experts and self-defense instructors we contacted held a variety of opinions about the practice time required to develop proficiency in the eight techniques; however, there was generally such a significant difference between their opinions on practice time and the amount of hours provided by the Bureau that sufficiency of the training in the techniques must be doubted. Furthermore, there was a consensus among the Bureau officials and self-defense instructors we contacted that the amount of training offered by the Bureau does not enable employees to become proficient in the techniques being taught.

The Department criticized us for basing our conclusions about the sufficiency of self-defense training on interviews

with only 57 Bureau employees. The Department pointed out that the Bureau's self-defense program started in 1979; therefore, employees with more than 3 years of service have not attended the basic self-defense training. According to the Department, these employees have received only 4 to 8 hours of self-defense training at their local institutions and some may be skeptical of the self-defense program. In our opinion, the results from our sample are meaningful when coupled with the comments by martial arts experts, self-defense instructors, and Bureau officials about the need for more training time. Furthermore, 19 of the employees we interviewed had been through the basic self-defense program given to new employees and they were as skeptical of the sufficiency of the training as the employees who had only received the training at their local institutions. Thirteen of the nineteen, or 68 percent, doubted they were capable of subduing a violent inmate using the self-defense techniques.

The incident we cited of an employee being attacked by a knife-wielding inmate occurred only 2 weeks before our interview and the employee--who had received the self-defense training that was given new employees--had been stabbed a number of times. In our opinion, because of the terrifying nature of the recent experience, the employee suggested what the Department perceived as excessive force in dealing with physical assaults by inmates. We did not use the comment to suggest that the Bureau drop its professional principle of controlling violent inmates without the use of brutality. But the comment does indicate what can happen if employees lose faith in the training the Bureau provides them.

Our current recommendation is being made because we believe the questions raised by our work are too significant to be summarily dismissed. The Department's comments provide no support for its contention that the amount of self-defense training the Bureau provides is adequate. If the technique is as successful as the Department claims, then it would appear that employees would be interested in refining their skill by practicing on their own time. If employees are not motivated to do this, we question how they can maintain whatever degree of proficiency they have achieved.

THE BUREAU SHOULD BE EXPLORING
ALTERNATIVES TO PROVIDING
CENTRALIZED TRAINING TO ALL
FIRST-YEAR STAFF

At the time we began our fieldwork, escalating travel costs and budget constraints were creating an uncertain future for the Bureau's program of centralized correctional training for first-year employees. The Bureau had a backlog of staff waiting to be trained and many employees did not receive the training on a

timely basis. The Bureau realigned its staff training center operations to overcome this problem; however, if training costs continue to increase because of rising air travel costs, the Bureau's action might only provide a temporary solution. To prepare for this, the Bureau should be exploring ways to make centralized training more affordable or developing a suitable alternative.

At the start of fiscal year 1981, the Bureau was operating staff training centers in Atlanta and Denver that were primarily for first-year employees; a center in Dallas for management and speciality training; and a food service training center at its institution in Oxford, Wisconsin. The centers in Atlanta, Denver, and Dallas used leased facilities to train and house the trainees.

In reviewing the training activities at the Atlanta and Denver centers, we noted that air travel cost increases and budget restrictions had created a backlog of about 1,000 new employees who had not been trained. Many of these employees would not be able to complete the training within 3 months after entering duty as prescribed by Bureau policy. Furthermore, some classes in correctional training were cancelled or reduced in size because of limited travel funds, thereby creating unused capacity.

In order to have sufficient funds and deliver the first-year training on a timely basis, we suggested to Bureau officials that they consider alternatives to training new employees at the Atlanta and Denver centers that would be less dependent on the availability of travel funds and more cost efficient. Essentially these alternatives consisted of providing training at or closer to the employees' home institution. Bureau officials told us that they planned to do everything possible to maintain centralized training. They believed it performed a vitally important training role for the Bureau by enabling first-year employees from various institutions to meet, exchange experiences, and develop a sense of unity. They also believed that centralized training can most effectively communicate the Bureau's policies and procedures to new employees.

Subsequent to our discussions, the Bureau announced a major reorganization of its staff training center operations. One purpose of the reorganization was to cope with the increased cost of travel and budget restrictions. The reorganization, which occurred at the end of fiscal year 1981, resulted in the closing of the Atlanta and Dallas centers and a cutback in the capacity of the Denver center which became responsible for management and specialty training. The thrust of the reorganization was a decision to provide 104 hours of introductory correctional training

for new employees at the Federal Law Enforcement Training Center in Glynco, Georgia, beginning October 1981. The training at the Center was to cover 27 subjects, including firearms, self-defense, cardiopulmonary resuscitation (CPR), legal issues, stress, contraband, custody security and control, and coping behavior.

On the basis of a comparison of the costs of using each approach, we estimate that the Bureau saved about \$500,000 annually by moving its training to the Center. Most of the savings could be attributed to closing the leased facilities in Atlanta and Dallas and one apartment unit in Denver and the lower cost of housing and feeding the employees at the Center, which is a Government-owned and -operated facility.

There is a strong possibility, however, that the cost of air and ground travel to the Law Enforcement Training Center from the various Bureau institutions will increase substantially in the future and thus reduce the savings achieved through the Bureau's reorganization. An airline industry expert estimated that the average price of an airline ticket rose 30 percent in 1980 and that the rise in 1981 would approximate the rate of inflation, about 10 percent. Furthermore, during fiscal year 1982 congressional budget hearings, an official responsible for the Center's operations said that the cost of transportation to and from the Center has gone up much faster than anticipated. The official said that because of airline fare deregulation, flying people to the Center is going to cost substantially more. The average trainee air and ground transportation costs increased from \$245 in fiscal year 1979 to \$324 in fiscal year 1980 and \$378 in fiscal year 1981--a 54-percent increase in 2 years.

In view of the increasing travel costs for training at the Center, the Bureau should either be exploring ways to make centralized training more affordable or developing a suitable alternative. One approach could be the elimination of training for administrative/support personnel at the Center. Approximately 30 percent of the Bureau's classes are composed of this type of personnel while the rest are correctional officers. For example, if there were 1,200 first-year staff, we estimate that by dropping training for administrative/support personnel, the Bureau would save about \$286,000 in travel costs during fiscal year 1983. The Bureau is already providing 80 hours of familiarization training to all new employees at their home institutions before they attend the Center. This training consists of 26 topics grouped into four areas covering introductory matters, security, working with inmates, and emergencies. Thus, including the 104 hours of training at the Center, the Bureau is providing administrative/support personnel 184 hours of first-year training, which is considerably

more than the 80 hours recommended by the American Correctional Association.

A second approach could be to expand and revamp the familiarization training given at the home institutions to replace some or all of the training at the Center. For example, major subjects taught at the Center--CPR (10 hours) and legal issues (6 hours)--could be taught at the home institution if local Red Cross and U.S. attorney's representatives, respectively, would be willing to provide instruction.

A third course of action could be the establishment of a cadre of full-time instructors at each of the five Bureau regional offices. These instructors would then visit institutions within the region to provide the introductory correctional training to new employees. These visits would have to occur once every 3 months so that the Bureau policy of providing all first-year training within 3 months after an employee enters on duty could be complied with. In order to reduce the number of institutions included in this circuit, training could be consolidated by combining new employees from smaller institutions with those from larger institutions.

Finally, the Bureau could consider establishing training locations for introductory correctional training closer to new employees' institutions, either on a regional basis or by basing the training at a major institution which would serve other institutions nearby.

In view of the million dollar outlay involved for travel, its potential increases, and the budget constraints, these and other alternatives need to be closely scrutinized.

Conclusions

The Bureau needs to keep close watch over its use of a centralized staff training center for providing introductory correctional training to its employees. In view of the increasing travel costs and current budget constraints, the Bureau may need to make certain modifications. If the Bureau is not prepared to do this, it could find itself faced with some of the same problems that occurred under the old system--a backlog of staff waiting to be trained and many employees not being trained on a timely basis because of a shortage of funds.

Recommendations to the Attorney General

We recommend that you require the Director, Bureau of Prisons, to explore alternative ways of delivering introductory

correctional training so that if the cost of the current approach becomes prohibitive, a well-thought-out alternative can be adopted. One suggestion which should be given priority consideration is the elimination of centralized training for administrative/support staff. If first-year training for administrative/support staff were given at employees' home institutions, the Bureau would achieve immediate savings but would still adhere to the minimum standards of the American Correctional Association.

Agency comments and our evaluation

The Department pictures GAO as recommending that centralized training be discontinued--a position we never took. We concluded that the Bureau may need to make certain modifications to its centralized, introductory correctional training program for first-year employees if travel costs become prohibitive and budget constraints continue. We stated that the Bureau should explore alternative ways of delivering introductory correctional training so as to have a well-thought-out solution if these events occur.

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We wish to thank you for the cooperation extended to us during this review. As you know, Section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the House Committee on Government Operations and the Senate Committee on Governmental Affairs not later than 60 days after the date of this report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of this report.

We are sending copies of this report to the Director, Office of Management and Budget.

Sincerely yours,

W. J. Anderson

William J. Anderson
Director



U.S. Department of Justice

JUL 16 1982

Washington, D.C. 20530

Mr. William J. Anderson
Director
General Government Division
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Anderson:

Thank you for providing the Department of Justice (Department) an opportunity to comment on your draft report entitled "The Bureau of Prisons Can Make Correctional Training for Its Employees More Relevant and Cost Effective."

Essentially, the General Accounting Office (GAO) report recommends that only a limited number of administrative/support personnel in the Bureau of Prisons (Bureau) be given firearms training, that training on the use of the carbine be limited to and provided by those institutions where this weapon is used, that firearms training be changed and improved, that training in self-defense either be simplified or changed to use other techniques, and that other alternatives to centralized training for first-year staff be explored, such as expanding the familiarization training given by home institutions, relocating the training to the Bureau's five regional offices, or some similar regional or institution-based approach.

The Department is reluctant to accept these various recommendations. Although the GAO study is in many respects impressive, we believe that it fails to adequately consider the specialized nature of correctional work, especially as compared to that of other law enforcement occupations; that it does not assess the Bureau's new 18-hour basic firearms training course which is being provided to first-year staff, and which commenced in its present form after the GAO investigation was completed; and that abandonment of centralized training would be heavily counterproductive to overall training efficiency. In contrast to the conclusion reached in the GAO report, the Department has long been convinced of the manifold advantages offered by a properly staffed and well outfitted centralized training facility compared to the inherent limitations of a more fragmented approach. Moreover, we believe that to make a sharp distinction between correctional and administrative/support personnel as the GAO report suggests, is inconsistent with the realities of the correctional environment and the recognition of these realities found in P.L. 93-350, 88 stat. 355 (1974), which defines law enforcement officers to include all personnel in correctional institutions for the purposes of a maximum entry age (which we have established) and early retirement. In responding to the various segments of the draft report our comments are categorized by issue.

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Administrative/Support Staff Should Not Receive Firearms Training

The Department considers it essential that all new employees receive firearms training with the exception of chaplains, dentists and physicians, whose participation in this training is optional. Within a correctional environment, every employee, regardless of occupational assignment, is considered to be a correctional worker; he or she is responsible for the security, safety and control of the institution. Every employee must be able to respond to institutional emergencies, may be assigned to work armed posts and may be called upon to assist in quelling disturbances in other Federal or state institutions, as in the case of the New Mexico State Prison riot. Accordingly, all staff members are expected to be fully trained and available to meet a variety of contingencies.

The GAO report, which surveyed 41 institutions, revealed that 22 of those institutions (54%) had used administrative/support staff (521 individuals) to staff armed posts between the period of October 1979 through June 1981. We believe that this data, rather than supporting the recommendation to exempt administrative/support staff from firearms training, argues for such training.

Selective Training in the Use of the Carbine

GAO suggests that officers from institutions where the carbine is not being used should not receive basic training in the use of that weapon.

All Bureau employees, with the exception of physicians, dentists and chaplains, are required to undergo training in all three basic weapons: the revolver, carbine and shotgun. This requirement also holds true for employees who work at institutions (such as camps, etc.) where the carbine may not be used routinely.

Adequate training with the carbine provides a part of the preparation which enables all Bureau employees to respond to emergencies anywhere in the Prison System. Basic training with the carbine develops an essential skill necessary for working in any of our institutions, and employee transfers from one institution to another are commonplace. In addition, Bureau staff are subject to being deputized as U.S. Marshals and assigned to controlling civil disturbances.

Firearms Training Should be Changed and Improved

GAO contends that the Bureau's firearms training is deficient in developing adequate proficiency and safety. The report refers to officials at the Federal Law Enforcement Training Center (FLETC), the National Rifle Association (NRA) and several law enforcement agencies as sources of expert opinion.

With regard to FLETC, the GAO auditors talked to the FLETC personnel during the summer of 1981; however, the Bureau's present 18-hour firearms training program was taught for the first time in October 1981, well after the discussions with FLETC staff. The current course was not developed at the time those meetings took place. We believe that the training currently being provided is entirely satisfactory.

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Although the two top firearms training officials at FLETC have a high level of expertise in training police officers, they are unfamiliar with the correctional mission as it relates to the use of firearms (neither individual has ever visited a Federal prison). As a result, they normally defer to the expertise of the Bureau's own detailed firearms instructor on such matters. Nonetheless, Mr. Leonard Ross of FLETC states in a letter as recent as June 18, 1982: "The level of skill, competency, and safe handling of weapons attained in the 18-hour program can be considered acceptable to the BoP firearms requirements of familiarization with weapons." He also notes that: "Initially there were no standards established for firearms, but, as the program and training developed, student proficiency was accelerated and updated. Currently, students are able to attain 70 percent hits on targets in the BoP courses of fire. This is an achievement which can be credited to the expertise of the firearms staff." The lead instructor for the program is a Bureau employee who is a correctional firearms expert.

The NRA also offers many quality programs, but we question their overall expertise regarding the operational needs of corrections. For example, the NRA recommended the AR-15 as the replacement weapon for the carbine presently used by the Bureau.

The Bureau was giving this recommendation serious consideration until our own firearms expert cited the potential for "overkill" that the AR-15 inflicts on targets, since its supersonic speed rounds create hydrostatic shock. The Bureau's policy is to shoot to wound, not to kill; the use of such a highly charged weapon as the AR-15 would significantly increase the possibility of inflicting fatal wounds. This recommendation was made in good faith, but undoubtedly without regard to the unique needs of a correctional setting or the Bureau's own policies, and legal and moral constraints.

The report states that, "For comparison purposes, we contacted several law enforcement agencies because the law enforcement profession is one in which proficiency with a firearm is essential." Certainly, the Bureau is a part of law enforcement, but it is not a police agency per se. To compare our firearms training needs with that required of police personnel is highly inappropriate. The types of primary weapons used, the rules for using deadly force, and the vast differences in work setting between corrections personnel and police make comparisons of their firearms training requirements essentially meaningless. It is noteworthy that the "experts" among those agencies listed obviously are in strong disagreement among themselves with regard to the amount of training new police officers should receive. For example, the required number of rounds for police officers with the revolver ranged from 600 to 1,200, and from 30 to 300 with the shotgun.

The Bureau implemented a new 18-hour firearms training program for all new employees in October 1981. Except for the FLETC firearms instructors, this program has not been observed by GAO or any of the experts quoted in the GAO report.

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The new program has been improved steadily since its adoption. It is a part of the pass-fail, basic three-week course required of all employees, except for chaplains, dentists and physicians. The scoring procedure has been strengthened and the program surpasses a mere familiarization with weapons.

Approximately 700 students have been trained in this program and they have fired in excess of 127,000 rounds of ammunition without any serious infraction of the safety rules and regulations. Of the 700 students trained, 97 percent have achieved passing scores.

The present Bureau firearms training program is deemed adequate to meet the agency's needs and to fulfill its mission.

Training in Self-defense Should Either be Simplified or Changed

The Bureau's self-defense program is approximately three years old, having been started in 1979. Employees who have more than three years of service have not attended the 18-hour program given to new employees when basic training was offered at the Denver and Atlanta Centers.

It is quite conceivable that employees who have several years of service have received only four to eight hours of self-defense training at their local institutions. Among these individuals there may have been some who were skeptical of this new program, and who felt more comfortable with the old trial and error methods of dealing with violent inmates.

We do not believe that the number of employees contacted by GAO represents an adequate sample to support the sweeping conclusions deduced therefrom. Only 57 employees--well under one percent-- were interviewed. Except for three employees, whose training hours were stated in the report, the entire text focused on the Bureau's current 18-hour basic self-defense program. We find this difficult to understand since the GAO interviews on self-defense were completed in September 1981, while the current 18-hour program did not begin until October 1981. Neither the GAO auditors nor, presumably, the other unnamed experts have had any opportunity to personally examine the present program. Additionally, the 92,000 hours of training in self-defense which GAO projected to be accomplished each year does not reflect an adequate assessment of the amount of training actually being scheduled.

The Bureau's self-defense program draws from several martial arts, with a major emphasis on Aikido. These techniques are easily learned and simple to apply. Students are taught three techniques of pain compliance, and eight situations where such techniques can be used. Those situations are based on actual incidents in correctional facilities.

Again, GAO quotes several experts, none of whom agrees on the amount of training necessary for proficiency in self-defense. Assuming that the Bureau's training is not sufficient, the report states:

"Too little training may cause another problem, as described in the following quote from the book Aikido by Massimo N. DiYilladorata.

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'Practically speaking, a superficial knowledge of the techniques is in fact worse than no knowledge at all, for this sort of knowledge can only give you a false sense of security which is worse than useless - indeed, downright dangerous - when the real moment comes along to use the techniques.'

Accordingly to Sensei Yamada, Chief Instructor, American Aikido Federation (7th Degree Black Belt/Schicidan), one could spend full-time in self-defense training for years. "A person becomes truly proficient when the mind and body are in harmony and function as one. This takes years of development. One may never fully attain this state."

The Bureau is neither interested in developing experts in self-defense nor in just providing superficial skills that employees cannot use effectively. Rather, the Bureau is providing adequate training for employees through this 18-hour basic self-defense program, which enables them to act defensively in dealing with violent persons. One should also note that many experts who prescribe what others need are in the business of selling those proposed services.

The Bureau's self-defense program is designed specifically for corrections. It is defensive in nature with no attacks, punches, kicks or blows. GAO quoted a Bureau employee who allegedly advocated, "teaching methods of disabling an inmate. . ." and "how to take an inmate out." Inmates who are out of control and violent must be controlled without brutality. To advocate such brutal treatment is repugnant to the professional principles of the Bureau and contrary to numerous court cases involving excessive force.

It should be noted that of the 48 Federal agencies that train at the FLETC, the Bureau's self-defense program is eight hours longer than that of any other agency. In December 1981, the Bureau's Staff Training Academy Master Instructors conducted a Training for Trainers Program in Self-Defense for FLETC and other Government agency instructors, i.e., the Drug Enforcement Administration and U.S. Marshals Service. Since that training, those agencies have adopted the Bureau's self-defense program as a part of their training. In light of these requests, FLETC's Physical Specialties Department has rewritten its defensive tactics training to incorporate most of the Bureau's program.

The Bureau's Self-Defense Training Program has been highly sought after by numerous state correctional agencies. The Bureau, in cooperation with the National Institute of Corrections in Boulder, Colorado, has provided numerous training programs and staff assistance for state and local personnel.

In conclusion, it is the Bureau's responsibility to provide a safe and humane environment for staff and inmates. The 18-hour self-defense program, as it presently exists, is a viable tool in providing this type of environment. The program meets their needs and is consistent with our philosophy. The more than 700 employees who have completed the 18-hour course are confident that their level of competence continues to increase.

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Alternatives to Centralized Training For All First-Year Staff

We are frankly more than a little surprised that the GAO report should recommend anything other than centralized training. The Bureau has expended considerable effort to standardize its training programs and to achieve a high level of consistency in training for all staff personnel. Our experience has proven over and over that the more fragmented training programs are, the less likely our employees will acquire the skills and knowledge necessary to carry out our mission.

One major purpose in moving Bureau training to FLETC was to operate only one basic training program where employees are trained in a standardized fashion. The Bureau has found that an acceptable level of consistency is most difficult to maintain when even two training centers are offering the same course.

GAO suggested two basic alternatives (or some similar combinations thereof) to centralized training for new employees. One was to provide all of the training at local institutions and the second was to offer training from the Bureau's five regional offices.

In reviewing these two suggested alternatives, neither has merit from our perspective. One centralized program can afford to have a staff with a high level of expertise in all necessary specialty areas, such as firearms, self-defense, disturbance control, cardiopulmonary resuscitation, legal issues, etc. It can also have the facilities, such as firing ranges, self-defense areas, etc., to do an effective job of training. These would be financially impossible to establish at each institution. To teach these highly technical classes at all 43 institutions, or even in the five regions, would set the employee development program back by at least twelve years; the costs would be prohibitive both in quality of training and in resources.

As an example, it was suggested that correctional legal issues could be taught by U.S. Attorneys in each of the Bureau's 43 institutions. There are a number of operational concerns that must be considered. Although U.S. Attorneys are highly trained and skilled, they are not expected to maintain a continuous, up-to-date knowledge of the unique and vast amount of correctional law and Bureau regulatory requirements. The content of this subject is both administrative and legal; class lectures relating to the Freedom of Information Act, Privacy Act, claims procedures, scope of employment, equal employment opportunity regulations, inmate discipline and employee rights are very agency-specific and have to be taught by persons regularly involved in their application within the Bureau.

The Bureau has a legal obligation to provide its employees with the best possible training and can be held liable if it fails to do so. A combination of localized and centralized training is the best approach toward achieving the desired training outcomes. Further, through centralization of basic training at FLETC, the Bureau has been able to eliminate the large backlog of persons waiting to be trained, since capacity for training is greater.

We believe it is crucial to maintain a centralized training site, especially for training new employees. The hazardous nature of correctional work, coupled with the high potential for personal liability, make a centralized

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training program mandatory if the mission of the Bureau is to be achieved. A centralized program, involving employees from all occupational specialties, has also paid great dividends in reducing conflicts between job specialties, regions, and institutions. The Bureau, in contrast to many correctional agencies, no longer has to fight the communication breakdown (and resultant problems) caused by the "treatment personnel" vs. "security personnel" mentality that is so prevalent in many correctional systems. That mentality is fostered, and finds fertile ground for growth, when training programs are so restricted and specialized that correctional officers are totally removed from contact with case management personnel, when industrial foremen never learn to appreciate medical personnel's needs, et cetera. For those who doubt the importance of this communication, we need only refer to the deeper lesson of Attica and other correctional systems where a strong division between custodial and other staff is practiced and reinforced.

Notwithstanding the cost of travel, which is certainly implicit in any use of a centralized training facility such as FLETC, nothing could be less cost effective than decentralized training. Under the latter approach, if we were to even roughly approximate the quality of the training now being delivered at FLETC, we would have to duplicate the staff and facilities of FLETC in at least five different locations. Inevitably, we would lose consistency, and most probably quality as well.

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In summary, the Department believes that it is essential to maintain a strong centralized correctional training program and that this program include all correctional staff, regardless of occupation or current job assignment (with the possible exception of doctors, dentists and chaplains). We also believe that the Bureau's firearms and self-defense training programs developed and implemented since GAO conducted its interviews, are good ones, well suited to the special needs of the Bureau and should be continued without change.

Should you desire any additional information pertaining to our response, please feel free to contact me.

Sincerely,



Kevin D. Rooney
 Assistant Attorney General
 for Administration

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