




Office of the Federal Detention Trustee
United States Department of Justice
Detention Standards and Compliance Division

**OFDT Strategic Objective 1.2: Develop DOJ Program and Policy on
Quality Assurance Reviews of Detention Space**

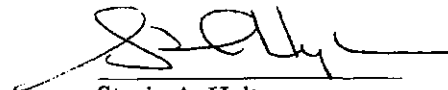
Project Plan: 1) Develop an Annual Schedule for Conducting Quality Assurance Reviews Using Performance-Based Detention Standards. 2) Conduct Quality Assurance Reviews of Detention Space to Ensure the Adequacy and Sufficiency of Services.

Approvals:

Date: 3/17/06



David F. Musel
Deputy Trustee



Stacia A. Hylton
Federal Detention Trustee

This plan was developed and completed by Claudia M. Hill, Chief, Detention Standards and Compliance Division; she is also the Project Manager. Implementation is contingent upon approval by the Deputy Trustee and the Trustee. Dissemination is as required and determined by the Division Chief.

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1. Background

The Office of the Federal Detention Trustee (OFDT) is responsible for providing oversight of detention management and for improving and coordinating detention activities to ensure Federal agencies involved in detention provide for the safe, secure, and humane confinement of detainees. To ensure a realistic but consistent approach to the issue of conditions of confinement and to ensure the government receives the services for which it paid, OFDT is implementing a set of Federal Performance-Based Detention Standards that will be applied to all private facility contracts, and, in a measured manner, to state and local facilities. The Federal Performance-Based Detention Standards provide a system of objective checks and balances to ensure that all providers understand and are able to achieve and maintain the standards while ensuring the government receives the services for which it paid.

2. Purpose, Scope, and Objectives

The purpose of this project is to establish and publish a schedule to ensure that regular Quality Assurance Reviews (QAR) are conducted in all private detention facilities and a defined number of state and local facilities.

The project scope involves the development of a detailed plan and schedule, along with implementing policies and procedures for conducting QARs.

The major objectives of the project are:

- Develop a detailed schedule for QARs for all private detention facilities and a defined number of state and local (IGA) facilities each year.
- Identify detention facility deficiencies and the actions necessary to correct deficiencies.
- Identify detention facility financial weaknesses related to deliverance of contract services and the actions necessary to correct those concerns.

3. References

- Office of the Federal Detention Trustee Strategic Plan 2006-2010, February 2006.
- National Detention Standards Chronological Formulation Events Log, January 2000 – July 2004.

4. Definitions and Acronyms

Term	Definition
Performance-Based Detention Standards	Core detention standards that apply to all non-Federal detention facilities contracted by the Department of Justice. The Standards provide a system of objective checks and balances to ensure that all providers understand and are able to achieve and maintain the standards while ensuring the government receives the services for which it paid.

Acronym	Meaning
BOP	Bureau of Prisons
CCR	Conditions of Confinement Review
COTR	Contracting Officer's Technical Representative
FA	Facility Administrator
DSC	Detention Standards & Compliance Division
FRT	Facility Review Team
ICE	Immigration and Customs Enforcement
IGA	Inter-Governmental Agreements
QAR	Quality Assurance Reviews
QART	Quality Assurance Review Team
SPM	Senior Project Manager (QAR Team Lead)
SME	Subject Matter Expert
USMS	United States Marshals Service

Table 1. Definitions and Acronyms

5. Assumptions

- The project is funded through Fiscal Year (FY) 2010.
- Appropriately trained manpower is available to conduct QARs.

6. Schedule and Budget

6.1 Schedule:

- Development of QAR Schedule and Review Policy – 109 Days (3 Oct 05 – 19 Jan 06)
- Training of Subject Matter Experts and QAR Team Leads – 2 Days (22-23 Feb 06)
- Facility Reviews – 208 Days (3 Mar 06 – 29 Sep 06)

6.2 FY 2006 Budget

Projects	Budget	Total
QARs		\$669,254
- Private (9)	\$372,192	
- Non-private (6)	\$261,062	
- Set Aside	\$36,000	
QAR Software Development	\$150,000	\$150,000

Table 2. QAR Budget

The Project Manager is in the process of requesting additional funds to complete four Conditions of Confinement Reviews directed by the Trustee. If the number and significance of deficiencies are minor, an administrative review of corrective actions will be conducted. However, if there are several or major deficiencies, the reviews will be conducted on-site at the facility.

7. Project Organization

7.1 External Interfaces

Organization	Liaison/Interface
USMS	Edward Sloane
BOP	Stewart Rowles
ICE	Tim Perry

Table 3. Project Interfaces

7.2 Internal Structure

Chief, DSC, is the Project Manager with assistance from Detention Specialists, SMEs, and Chief, Procurement Division as necessary. The Chief, DSC, will follow-up to ensure this plan is linked with associated project plans being developed by the OFDT Information Technology Division and Procurement Division.

7.3 Roles and Responsibilities

Role	Responsibilities	Person
Project Manager	Overall project management and schedule approval	Claudia Hill
Assistant PM & Assistant Division Chief	Assist PM and oversee QARs	Theo Anderson
Detention Facility Specialist	Assist PM and oversee QARs	Mike Thomas

Table 4. Project Roles and Responsibilities

9.2 Facility Review Work Breakdown Schedule.

The schedule below defines the 3 Phases of the Project and details actions taken by the Project Team in the conduct of QARs:

Task:	<p>The Senior Program Manager (SPM) notifies the Facility Administrator (FA) of an upcoming review at least 60 working days prior to the scheduled on-site review.</p> <p>The FA can request postponement of a scheduled on-site review within 5 working days of receiving initial notice of an upcoming review for special circumstances. The owner of the contract will make the determination to grant or deny the request.</p> <p>The SPM will provide the facility review plan to the Quality Assurance Review Team (QART) at least 7 days prior to the on-site review.</p>	<p>60 days</p> <p>Note: Provides DSC & Facility time to prepare for QAR.</p>
	Duration Total =	60 days

Task:	When the QAR is completed, the SPM will distribute the review report to the DSC Division within 14 working days of the ending date of the review. This step includes follow-up contact with the FA to supplement or clarify information to be incorporated into the report.	14 Days
Task:	DSC reviews report and comments within 5 working days after receipt of the report.	5 Days
Task:	The FA is to respond to the SPM's review report within 90 days upon receipt of the report, to include implemented and pending corrective action plans with specified target dates. If the facility's response and corrective action plans are acceptable, the DSC will initiate closure of the review.	90 Days
Task:	Upon receipt of the FA's corrective actions, if no follow-up on-site review is required, the review report is to be completed by the SPM within 5 working days and forwarded to the DSC.	5 Days
Task:	The DSC will forward the review report to the Contracting Officer's Technical Representative (COTR) within 5 working days.	5 Days
	Duration Total =	119 days

	Phase III: Follow-Up On-Site Review	Task Duration
Task:	After completion of the initial review, DSC will determine if an Administrative Facility Review or a Follow-up Facility Review is required.	30-60 Days
Task:	If the FA's corrective action plan is acceptable, the SPM will request closure of the review upon receipt of the DSC's response letter within 5 working days. The FA and the COTR will be advised of the closure of the review.	5 Days
Task:	Within 10 days of receipt of the SPM's review report, the FA can issue a written appeal to the DSC.	10 Days
Task:	Upon receipt of the FA's written appeal of an initial review report, the DSC will discuss the appeal with the QART and render its decision in writing to the FA and the QART within 10 working days.	10 Days
Task:	Upon receipt of the SPM's amended review report (granted appeal), the FA has 90 days to respond to the SPM's review report, to include corrective action plans with specified target dates.	90 Days
Task:	If the appeal is denied by the DSC, the FA has 90 days upon receipt of the DSC's decision letter to initiate applicable corrective action plans to include specified target dates.	90 Days
	Duration Total =	265 days

9.3 Project Deliverables

Deliverables	Projected / Finish Date
QAR Schedule	November 2005
Outyear QAR Schedules	September Each FY
Timetable Breakdown Schedule	September Each FY
Facility Notifications	60 Days Prior to QAR
Contract for SMEs	December 2005
QAR Policy Document	January 2006
Security Clearances for SMEs	January 2006
Training of SPMs	February 2006
Facility Review Reports	119 Days Following QAR
Follow-up Review Reports	65 Days After Initial Review
Response to Appeals	10 Working Days
Conditions of Confinement Reviews	As Required

Table 6. Project Deliverables

10. Control Plan

The Project Manager will ensure budget and other resources, and scheduled allocations are tracked on a monthly basis. Pertinent databases and project management files will be updated as required. Material and travel costs will be controlled and monitored by the Project Manager in accordance with OFDT guidelines. The Project Manager will provide bi-monthly updates to the Deputy Trustee and the Trustee on the status of the project and progress made.

11. Closeout Plan

This Project is a recurring requirement for the Detention Standards and Compliance Division, OFDT. At the end of each FY QAR cycle, all documents and databases will become records of the Project filed by FY.

DOCUMENT CONTROL

CHANGE HISTORY

Revision	Release Date	Description (list of changed pages and reason for change)

DOCUMENT STORAGE

This document was created using Microsoft Word. The file is stored at G:\ODT\Claudia Hill

DOCUMENT OWNER

Claudia Hill, Chief, Detention Standards and Compliance Division, is responsible for developing and maintaining this document.