Cover Sheet

Please accept BI's formal Capability Statement for a Criminal Activity Monitoring Solution under the current ATD/ISAP IV IDIQ (70CDCR20D00000011).

USA-Based Operations

Main Points of Contact

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Other Organizational Information

DUNS Number	094160959
Small Business Classification or other status	N/A: Corporation
Relevant Contract Numbers	70CDCR20D00000011

BI Monitoring Operations
Anderson, IN 46013

Restriction on Disclosure of Data

This proposal contains trade secret and confidential business or financial information exempt from disclosure under the Freedom of Information Act. This information is not to be disclosed outside of the Government and shall not be duplicated, used, or disclosed—in whole or part—for any purpose other than to evaluate this *Capability Statement*.

BI Monitoring Operations/Backup
Aurora, IL 60505

September 23, 2021

Sent via email

ATTN: [(b)(6); (b)(7)(C)] Section Chief
Detention, Compliance and Removals (DCR)
Office of Acquisition Management (OAQ)
Immigration Customs Enforcement
Department of Homeland Security

Re: *Request for Proposal:* Criminal Activity Monitoring
        ATD/ISAP IV IDIQ Contract Number: 70CDCR20D00000011 Questions

Dear [(b)(6);]

In an effort to continue improving the level of service we provide to ICE, BI Incorporated (BI) is pleased to offer our proposal for a Criminal Activity Monitoring solution. The agency emphasizes the need to focus enforcement action on immigrants deemed a threat to public safety or national security. BI understands these needs from 17 years of supporting ISAP operations and overall ERO objectives.

As an established partner with ICE ATD, we are excited to provide the agency with information about how our established solutions can be tailored to meet evolving program needs. By leveraging a new partnership with ClearForce, LLC, BI can rapidly present criminal arrest activity to ICE to act upon in support of its mission.

The foundation of our solution is developing an integration with ClearForce. Through our integrated approach, persons of interest, either part of the ATD program or outside it, can be automatically enrolled in the ClearForce system. This enrollment will query databases to determine prior police interaction and monitor any new criminal activity going forward. Our proposed solution will benefit ICE, as officers will not have to take the time to run criminal record checks on participants. Detailed within this response, criminal record checks will now be completed automatically, and relevant updates will be communicated to the agency by BI ISAP staff. This model has proven to be effective in a 60-day pilot program detailed within this proposal.

We are confident that DHS and ERO will conclude that BI's proven staff and approach can combine with the established ClearForce system to provide information more rapidly than previously available. We are excited and prepared to earn the opportunity to continue serving the mission of ERO.

Bes

(b)(6); (b)(7)(C)

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Technical Overview and Introduction

The Intensive Supervision Appearance Program (ISAP) supports the Office of Enforcement and Removal Operations (ERO) by managing appropriate, non-detained individuals engaged in immigration proceedings. Over the past 17 years, ERO has used ISAP to drive compliance with agency and immigration court reporting requirements and decisions. ISAP has also proven to be a force multiplier by reducing the administrative burden placed on ICE officers in the field.

Over the past several years the non-detained docket has swelled to more than three million individuals. ICE has primarily relied on ISAP to help manage this expanding population.

With the agency's needs in mind, BI entered a partnership with (b)(4); (b)(7)(E) to deliver a pilot program to the agency. This pilot program was aimed at enhancing and expanding BI's monitoring capabilities by accurately and promptly capturing participant criminal activity through biographic monitoring, while ensuring legally compliant use of criminal data (b)(4): leverages biographical information, such as participant name, date of birth, and geolocation. Using this biographic monitoring capability (b)(4): has the ability to provide daily notification of arrests and incarceration, including bookings, transfers, and releases.

By sourcing data directly from booking facilities, (b)(4): (b)(4); (b)(7)(E) than the FBI fingerprint database. (b)(4); (b)(7)(E) supports BI's ability to perform initial triage of arrest notifications, ensuring legal compliance and enabling a more complete capture of criminal activity. This capability is crucial for sanctuary jurisdiction data, which ICE generally no longer receives.

> 66 To identify, arrest, and remove aliens who present a danger to national security or are a risk to public safety, as well as those who enter the United States illegally or otherwise undermine the integrity of our immigration laws and our border control efforts. Enforcement and Removal Operations (ERO) upholds America's immigration laws at, within and beyond our borders through efficient enforcement and removal operations. 99
>
> — ERO MISSION

Criminal Activity Monitoring Objectives and Opportunities

The key objectives associated with the BI and (b)(4); program include:

- Improving public safety and reducing the reputational risk for ISAP by identifying participants that pose a threat to the communities
    - This is accomplished through criminal information that may not otherwise be known to ICE, BI, or the ISAP program
- Enhancing and expanding monitoring in ISAP (b)(4); (b)(7)(E) (b)(4); this ultimately supports higher volumes of participants in ISAP
- Ensuring legal compliance while accessing criminal data in sanctuary jurisdictions, a challenge that is multiplying exponentially
- Providing more timely notification of crimes committed by ISAP participants

Completed Pilot Program

The 60-day, (b)(4); ISAP pilot program began on July 3, 2021 and included:

- Reviewing 36-months of criminal arrest data for a population of 9,600 non-criminal males
    - These individuals were active in the program and enrolled prior to June 1, 2020
    - The sample included 31-50 year-old males who had been previously been removed and illegally reentered the United States

- Monitoring criminal arrests, in real time, for a population of 10,000 criminal males aged 18-50, including a sample of criminal females

Throughout the pilot, BI ISAP staff reviewed all hits and performed independent verification steps as needed. Based on this information, BI provided notification to ICE in a manner consistent with established protocols. All supervision or enforcement decisions stemming from the criminal activity data remained solely under the purview of ICE. (b)(4); supported the secure transfer of criminal information with encryption in transit and at rest, without accessing or viewing personally identifiable information (PII) of individuals within the program.

Pilot Results

To clearly communicate the results of the pilot program, BI has segregated information into two categories: 1) information gathered from auditing 36-months of data; and 2) monitoring activities taken based upon the initial 60-day monitoring period.

1. Results from 36-Month Audit

During the pilot program (b)(4); reviewed 36-months of criminal arrest data for a population of 9,600 non-criminal males. This review resulted in the following metrics:

- 425 individuals were arrested, representing 4.5% of the 9,600 population
- 32 individuals were arrested for violent crimes, including kidnapping, sexual assault, assault, and hit and run incidents
- 70 individuals arrested had previously been removed, including six participants arrested for violent crimes
- 57% of the arrested individuals resided in the seven "Sanctuary States", including California, New York, New Jersey, Washington, Oregon, Colorado, and Illinois
- A large number of individuals were released from custody, with no indication that the participant was turned over to ICE

2. Results from Active Arrest Monitoring

During the pilot program, (b)(4); monitored criminal arrests, in real time, for a population of 10,000 criminal males aged 18-50, including a sample of criminal females. These monitoring activities generated the following results:

- 81 non-citizens were arrested over the 57-day pilot period, from July 3, 2021 to August 19, 2021
- Three homicides and a terroristic threat were identified by ClearForce in the first 14 days of monitoring
- Arrests were enacted for:
  - Felon in possession of a firearm
  - Aggravated assault with a deadly weapon
  - First degree arson
  - Corporal injury to spouse
  - Assault
  - Battery
  - Online sexual corruption of child
  - Sodomy
  - Mutilating/hiding a corpse
- Strong match accuracy

- ClearForce generated 74% alerts within 12 hours of booking and 90% of alerts within 24 hours of booking
- ClearForce alerted BI ISAP staff of a non-citizen that was arrested for homicide in Milwaukee

Benefits of Proposed Solution

By enacting a *Contract Modification* to introduce the Criminal Activity Monitoring Solution to the ISAP program, the agency will realize the following benefits:

- The (b)(4); (b)(7)(E)   TotalAccess to provide automatic notifications to BI ISAP staff through a seamless process.
  - Our ability to integrate with this system will efficiently provide arrest information, in a timely fashion, to the government
- Improving community safety through identifying individuals that pose a threat to public safety
  - These non-citizens may not otherwise be identified
- Providing a minimally-invasive supervision option for larger populations of individuals
- Enhancing the integrity of ISAP by providing greater visibility into non-compliant activities, such as criminal activity and violations of geographic restrictions
- Enabling BI ISAP staff to provide greater oversight of individuals in the ISAP program
- Supporting swift notification to ICE, allowing the agency to determine if non-citizens should have continued participation in the ISAP program
- Providing additional location information to support compliance with reporting requirements
- Assisting ICE by providing the agency with additional information to drive enforcement priorities
- Providing customizable reporting capabilities

Manual Review Program During Integration

During the integration effort, BI proposes that a team provided by both BI and (b)(4);   review the entire ATD population. This manual review will continue until the integration is complete.

Cost Proposal

BI is pleased to provide ERO with our solution to integrate (b)(4); (b)(7)(E) with BI's TotalAccess software. Our approach to pricing this solution includes seeking the agency's approval to reallocate software development resources and prioritize the (b)(4); (b)(7)(E) before beginning work on streaming BI information to ICE's data lake. The contract modification will enact changes to two existing CLINs in BI's existing ISAP IV contract.

All other ISAP IV CLINs remain unchanged.

Management Fee CLIN: Annual Subscription and Integration Efforts

Should the agency approve reallocating resources, BI proposes increasing the *Management Fee CLIN* as detailed by the following table.

CLIN	Cost Per Event			
	CY2	*CY3*	*CY4*	*CY5*
Total Prepayment Option[1]	(b)(4)			
OR				
Monthly Fixed Fee Increase	(b)(4)			

Table 1. Management Fee CLIN Options

These costs will include both BI and (b)(4); (b)(7)(E) and subscriptions up to (b)(4) participants

During implementation efforts, BI will renegotiate costs based on any additional information discovered. We will renegotiate costs, including potential increases or decreases, as appropriate.

Alert Management CLIN

To review, verify, and refer criminal activity to ICE in a consistent manner, BI proposes increasing the Alert Management CLIN on all participants by (b)(4)

CLIN	Cost Per Event			
	CY2	*CY3*	*CY4*	*CY5*
Alert Management CLIN	(b)(4)			

Table 2. Alert Management CLIN

(b)(4)

Subfactor 1—Staffing Plan and Qualifications of Personnel

Intensive Supervision Appearance Program (ISAP) operations are continually evolving in response to shifting operational needs, policies, and participant populations. ISAP I began with 8 sites and approximately (b)(employees; today ISAP III has 89 active sites and employs more than (b)(4 staff members. The agency requires an ISAP staffing approach that can quickly expand to meet the Office of Enforcement and Removal Operations (ERO) objectives, while adhering to contract requirements.

Staffing Plan

① **DEFINE ADMINISTRATIVE CHAIN OF COMMAND**

② **RECRUIT AND HIRE STAFF**

③ **TRAIN STAFF**

④ **DELIVER SERVICES AT PROPER RATIOS**

⑤ **RETAIN STAFF**

⑥ **MANAGE DISCIPLINARY ACTIONS AND REMOVALS**

⑦ **REPORT STAFFING INFORMATION**

Applicable RFP Sections:
Scope of Work: C.4; C.5; C.6; C.7
Security: H.2.; H.3; H.4
Clauses: I.2
Instructions: L.6
Evaluation: M.2

BI's *Staffing Plan* enables us to hire, train, and retain employees who can effectively supervise participants while supporting their stabilization in the community—all while fulfilling contract requirements and increasing Immigration Court appearance and removal rates. As detailed within this section, BI's *Staffing Plan* meets all solicitation requirements.

BI will leverage our proven, flexible staffing model to operate ISAP IV while maintaining staff ratios based on the specific requirements of each service level and technology option.

Foundational to BI's approach to staffing ISAP IV is our existing, nationwide ISAP III workforce. In addition to (b)(4 dedicated ISAP employees, BI has (b)(staff members with Suitability Determinations who support the program, **exceeding** contract requirements.

① **DEFINE ADMINISTRATIVE CHAIN OF COMMAND**

Our administrative chain of command—staffed with many immigration services experts who have supported ISAP since inception—enables responsive, continual communication with ERO. This administrative chain of command supports our operational structure (see Establish Operational Chain of Command) and enables us to meet key contractual requirements, including compliance with local and national laws and the support of 24/7/365 operations.

Alignment with Government Structure

BI's ISAP IV oversight and management structure mirrors ERO's operational organization. Our Staffing Plan incorporates the correct ratios of offices and staff per Regional Manager, enabling us to quickly adjust our structure in tandem with any changes during ISAP IV.

The administrative structure is overseen by former ISAP Director (b)(7)(C) In addition, (b)(6) (b)(7)(C) the former ISAP III Program Director, will leverage his 15 years of experience supporting ISAP operations to manage a new Immigration Services Division. Our administrative chain of command also supports BI's compliance with legal requirements in *RFP Section C.5.a.* BI's approach to staffing and supporting ISAP IV is summarized in the following figure.

ISAP ADMINISTRATIVE STRUCTURE

BI's administrative chain of command closely aligns with ERO's AOR structure.
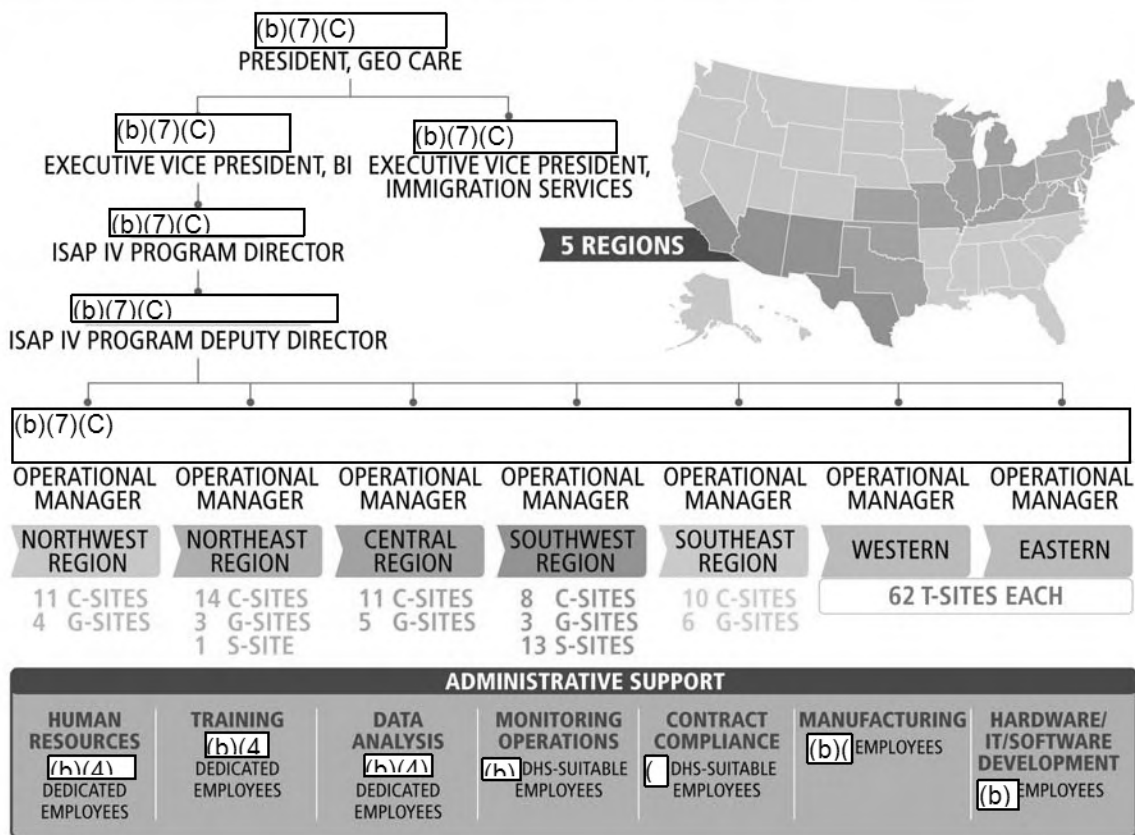
Figure 1. Administrative Structure

New Immigration Services Division. BI's solution includes a new division that will support ISAP operations in the performance of contractual tasks with a focus on effective case management services. This division complements the checks and balances of our *Quality Control Plan* with outcome-focused service delivery. In addition, the Immigration Services division will manage non-governmental organization (NGO) subcontracts. The table below summarizes other additions, changes, and improvements to BI's staffing structure.

Table 1. ISAP IV Staffing Enhancements at Contract Inception—Exceeds

Category of Support	Dedicated Staff *Supporting ISAP III*	Dedicated Staff *Supporting ISAP IV*
Immigration Services Division	(b)(4)	
Training		
Human Resources		
Data Analysis and Reporting		
Real Estate		

BI will staff Data Analysis/Reporting and Human Resources positions based on participant ratios. The number of staff in these roles will grow as the participant population increase. BI will hire staff indicated in *Table 1* upon ISAP IV award.

② RECRUIT AND HIRE STAFF

Hiring qualified individuals is critical to the success of ISAP IV operations, especially with participant populations continuing to expand and diversify. Our *Recruitment Plan* mitigates risk by anticipating Entry on Duty (EOD) lead times, program growth, and staff turnover. We will recruit employees through all major online forums, reward employees through referral programs, and participate in military and diversity hiring initiatives.

Multi-Cultural Recruitment. BI's recruitment efforts focus on finding bilingual, multicultural candidates who possess the complex combination of skills necessary to successfully support positive ISAP outcomes. Distributing our job advertisements to numerous career and job search organizations helps us connect with diverse groups. For example, we post job openings to LatPro, an organization that helps match Hispanic and bilingual candidates with employers. 91% of our current ISAP III workforce are minority and 69% are women.

To fulfill all background check and security requirements—as detailed in *RFP Sections H.2.2, H.2.3,* and *H.2.7*—our hiring process involves the following:

- Proactively recruit (b)(4) additional Case Specialists per location, hired contingent upon need, in anticipation of rapid program growth and location expansion. For additional information regarding BI's approach to expediting staff hiring, see EOD Staff Suitability.

- Use CareerBuilder and ZipRecruiter to assist with job postings, applicant tracking, and background and screening processes to develop a diverse, highly qualified applicant pool.

Highly Educated Workforce

98.8% of BI ISAP employees have a degree or accreditation, exceeding RFP requirements.

- Screen candidates using an independent employment agency to conduct background investigations; administer pre-employment drug screens; check FBI, state, and county criminal records; and check motor vehicle records and central registries.

- Confirm citizenship and residence in the United States for at least three of the last five years, taking precautions to ensure compliance with all employment-related laws and regulations.

- Provide detailed job requirements and working environment information to candidates to establish understanding of position responsibilities and contractual requirements.

- Use behavioral interviewing techniques to hire the most qualified candidates. This interviewing technique predicts future behavior versus relying on candidates' self-assessments, contributes to long-term retention rates, and lowers turnover.

- Verify that candidates meet all licensing requirements before hire.

- Work closely with ERO to forecast program growth.

ISAP IV DEPARTMENT OF HOMELAND SECURITY   Solicitation Number: 70CDCR19R00000002 | July 1, 2019
Intensive Supervision Appearance Program

_____ Section 1 | **TECHNICAL**

BI's established, nationwide ISAP III workforce is uniquely qualified to support the future of the program. In fact, 96% of BI's ISAP Case Specialists and Administrative Assistants are bilingual or multilingual. This diverse workforce contributes significantly to participant understanding of ISAP requirements. We also use ERO-approved professional translation services as needed and in accordance with *RFP Section C.6.5.* Please see Expedited Hiring Process.

Standards of Conduct. In accordance with *RFP Section C, Item 5.c*, BI has an ERO-approved *Standards of Conduct* and confidentiality policy for employee competency, conduct, appearance, and integrity. This policy addresses all *Standards of Conduct* requirements detailed in the *RFP*, from social media to the reporting of potential violations. Employees will receive *Standards of Conduct* and confidentiality policy documentation and training and certify in writing that they have read and understood these standards. We will provide a copy to the Contracting Officer's Representative (COR) before the employee begins ISAP duties.

③ TRAIN STAFF

Successful outcomes on a national scale require consistent training regardless of location. The ISAP IV Training Department will work closely with the new Immigration Services Division to promote consistency in service and application of proven practices. Our approach to initial and ongoing training is detailed in our *ISAP IV Training Plan,* which we will provide to ERO within 30 days of contract award. BI confirms that we comply with all training requirements, including specifications in *RFP Section 6.3.*

New Employee Training. During our intensive, four-week New Employee Training (NET), newly hired staff shadow seasoned employees and attend webinar training delivered by the ISAP-dedicated Training Department. During the first two weeks of employment, new employees complete all mandatory training requirements. See Transition Plan for more information on training, training materials, and audit practices that BI will use in ISAP IV.

> **Evidence of Training Capabilities**
>
> *During ISAP III, BI trained more than 1,600 ERO officers on topics from EM technologies to ISAP program processes. This will expedite ISAP IV implementation and offers a continuity no other vendor can provide.*

Monitoring Specialist Training. Onsite Monitoring Specialists are available 24/7/365 at our

(b)(7)(E)

(b)(7)(E)   We **exceed** requirements by mandating seven weeks of initial training, including ISAP-specific policy and procedure courses.

Training Documentation. To evidence that BI will conduct all staff training in accordance with contractual requirements, we will provide the agency with detailed reporting, staff certificates, and any other documentation required.

ISAP IV Training Topics. The figure on the following page provides detailed information on the types of training provided, specific training frequencies, and correlation with *RFP* requirements.

TRAINING TOPICS

All ISAP employees will receive robust skills development and training designed to increase participant engagement, improve outcomes, and reinforce program fidelity.

63.5 MINIMUM COURSE HOURS OFFERED TO ALL STAFF

RFP REF.	TOPIC	LENGTH (HOURS)	PROGRAM MANAGER	CASE SPECIALIST	ADMINISTRATIVE ASSISTANT	ANNUAL/ REFRESHER	NEW HIRE
			EMPLOYEE			FREQUENCY	
C.6.3	Ethics and Authority	2	•	•	•	•	•
C.6.3	Note-Taking and Report Writing	4	•	•	•	•	•
C.6.3	Self-Defense	8	•	•	•	Every 2 yrs	•
C.6.3	Human Relations	1	•	•	•	2 hrs	•
C.6.3	Handling Disorderly Conduct, Civil Disturbances, and Other Incidents	3	•	•	•	2 hrs	•
C.6.3	Communicating Across Cultures	1	•	•	•	2 hrs	•
C.6.3	EEO & Diversity: Managers and Supervisors	1	•			•	•
C.6.3	Orientation	1	•	•	•		•
C.6.3	Communications	3	•			•	•
C.6.3/ C.6.14	Solving Performance Problems/Disciplinary Actions	2	•				•
C.6.3	Counseling Employees	3	•				•
C.6.3	Leadership Skills	10.5	•			•	•
C.6.3	Scheduling	3.5	•				•
C.6.3	Equal Employment Practices	3	•			•	•
H.4	DHS Computer Security Awareness Training	1	•	•	•	•	•
H.3.2	Privacy at DHS: Protecting Personal Information	1	•	•	•	•	•
C.6.3	DHS Basic Records Management	1	•	•	•	•	•
C.6.3	DHS Electronic Records Management	1	•	•	•	•	•
H.3	Annual Information Assurance Awareness Training Course	1	•	•	•	•	•
C.6.14	ICE Policy Training	1	•	•	•	•	•
C.6.14	Standard Operating Procedures and Policies	1	•	•	•	•	•
C.6.14	Participant Orientation and ISP Development	ongoing	•	•	•	•	•
EXCEED	Electronic Monitoring Technology GPS, SmartLINK, VoiceID	2-5	○	○	○	○	○
EXCEED	Trauma-Informed Care	1.5	○	○	○	○	○
EXCEED	ECMS (Case Management, Assessments and Home Visits, Documentation, Communication, NGO Networking)	16	○	○	○	○	○
EXCEED	Emerging Leaders Program	24	○	○	○	○	As needed to promote career path

KEY ○ EXCEEDS CONTRACT

Figure 2. ISAP Staff Training Plan

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④ DELIVER SERVICES AT PROPER RATIOS

BI's highly flexible *Staffing Plan* is designed to meet a variety of supervision needs. This *Staffing Plan* will accommodate ratio requirements by location type. Through a combination of local staff based in BI or Government offices and remote support from our 24-hour Monitoring Operations facilities, our approach will provide comprehensive, around-the-clock services.

In all cases, BI will meet or exceed the minimum staffing requirements of *Section C* of the solicitation. The core of BI's staffing model is based on time and motion analysis of the specific tasks associated with each service option. The service mix will vary in each office based on reporting frequency, Extended Case Management Services (ECMS) enrollment, and electronic monitoring options selected by ERO. The following table shows minimum staffing ratios by site type. Based upon service mix, we may increase staffing beyond these minimums to provide proper duty coverage. BI will provide 24-hour support, including alert resolution and enrollment, when indicated by service type.

Table 2. Staffing Ratios By Site Type					
Location Type	**ISAP IV Position**				
	Program Manager	*Deputy Program Manager*	*Senior Case Specialist*	*Case Specialist*	*Administrative Assistant*
C-site[1] *BI-Operated Office Includes ECMS*	(b)(4); (b)(7)(E)				
G-site *ERO-Operated Office*					
S-site *Border Locations*					

Our ISAP IV solution includes a flexible staffing approach based on the service mix at each office, which will vary based on the home and office visit and reporting frequency, ECMS enrollment, and electronic monitoring options selected by ERO (e.g., GPS, VoiceID, or SmartLINK). Based on our time and motion analysis, BI anticipates that we will often **exceed** RFP-required ratios due to service-type variance. BI understands ERO's 90-day grace period related to maintaining staffing ratios, per *RFP Section C.6.a.*

Staff Licensure Plan. All ISAP employees who perform in-field services, such as home visits and residence verifications, maintain active driver's licenses. All staff must also complete training

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[1] C-site staffing ratios are based on a 30-day average of the active participant population.
[2] This ratio will vary depending on the actual service mix but will never exceed (b)(4), as required.
[3] Case Specialists perform partial enrollment, equipment installation, and service assignment in accordance with *RFP Section C.6.*

certification and maintain suitability determination. BI uses an internal database to verify all staff meet contractual requirements, including staff licensure and training. New ISAP staff will receive approved identification credentials, meeting all requirements in *RFP Section C.6.7.*

24/7/365 Operational Staffing. Our practices, policies, and processes to meet or exceed operational staffing requirements, including the following:

- Forecast program growth and staff turnover and recruit to these forecasts to mitigate the risk of staffing shortages.

- Recruit and obtain EOD for (b)(4) Case Specialists above requirements in each location to increase staff availability and streamline the recruiting process.

- Hire to meet staffing ratios. These ratios identify shortages immediately and replace internal approval processes. This means we are faster to act.

- Support ERO and ISAP operations 24/7/365 with a trained Monitoring Operations workforce that continuously performs alert investigation and resolution activities.

- Minimize response times. Our Emergency Readiness Plans enable us to quickly contact ERO and participants in the event of a natural disaster or local problem.

- Maintain a large contingent of non-ISAP-dedicated employees, (b)(at present, with suitability determinations and ISAP training to meet national staffing needs.

- Hire ISAP staff who are available after hours and in remote locations to cover operational needs (e.g., enrollment and device assignment) and extenuating circumstances.

In addition, BI will actively communicate staffing levels and schedules with ERO. We will continue to provide updated *Staffing Rosters* that include employee contact information and availability. Our experienced, local Program Managers will coordinate staffing levels to arrange for sites to remain appropriately staffed in support of 24-hour operations. Please see Manage Communications with ERO for detailed information.

Availability of Subject Matter Experts. Successful program outcomes rely on a combination of technology and case management services. BI and GEO will draw upon the expertise within our organization to provide proven, responsive, and innovative solutions to support ISAP. These individuals will support our ISAP Director, (b)(7)(C) and his operations team. Examples of subject matter experts (SMEs) and areas of expertise are summarized in the following table.

Table 3. SME Experience and Qualifications

Name	Experience and Areas of Expertise
(b)(7)(C) *Former ISAP Director*	**30+ Years:** *Clinical, Criminal Justice, Leadership* **15 Years:** *Immigration*
(b)(7)(C) *Invoicing and Reporting*	**32 Years:** *Financial, Statistics, Reporting, Billing* **15 Years:** *Immigration*
(b)(7)(C) *Former ISAP Director*	**25 Years:** *Leadership, Government, Policy* **15 Years:** *Immigration*

Table 3. SME Experience and Qualifications	
Name	**Experience and Areas of Expertise**
(b)(7)(C) *Human Resources*	**24 Years:** *Human Resources* **15 Years:** *Immigration*
(b)(7)(C) *Technology and Development*	**25 Years:** *Software Development and IT*
(b)(7)(C) *Communication and Media Management*	**24 Years:** *Communication, Criminal Justice, Media* **15 Years:** *Immigration*
(b)(7)(C) *Monitoring Operations*	**30+ Years:** *Call Center Management, Training* **15 Years:** *Immigration*
(b)(7)(C) *Legal Counsel*	**22 Years:** *Legal, Contract Administration* **15 Years:** *Immigration*
(b)(7)(C) *Director of Programs, GEO Care*	**15 Years:** *Clinical: Trauma-Informed*
(b)(7)(C) *Former President and CEO of BI*	**30+ Years:** *Leadership, Strategy, Organizational Management* **15 Years:** *Immigration*
(b)(7)(C) *Social Worker*	**20 Years:** *Clinical*
(b)(7)(C) *Founder, Pro-tech[4] Monitoring CEO, CellDetect*	**25 Years:** *GPS Technology Development*
(b)(7)(C) *Founder, Pro-tech Monitoring CIO, CellDetect*	**25 Years:** *GPS Technology Development*

In addition to the individuals listed above, BI Hardware Engineers, Software Developers, and Manufacturing Technicians are all committed to deploying our proposed ISAP IV technologies. Our fully integrated solution, completely owned and operated by BI, will give ERO a single, uninterrupted line of communication with our staff for all aspects of the program. Few, if any, other vendors can provide such a consolidated, single-source solution.

Compliance with Staffing Regulations, Clauses, and Requirements. BI agrees to all other staffing requirements, including: *Transfers from Other DHS Contracts (RFP Section H.2.4), Continued Eligibility (RFP Section H.2.5),* and *Credential Requirements (RFP Section C.6.7).*

⑤ RETAIN STAFF

To prepare employees to fulfill the long-term mission of ISAP IV, our Staffing Plan includes new staff orientation, extensive hands-on training, employee "shadowing," and careful oversight, all leading to increased retention.

Employee Retention and Career Paths

86% of ISAP III Program Managers were promoted from within our organization.

BI's policies promote a positive work environment and open communication to support employee job satisfaction and overall fit within our organization.

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[4] Pro Tech was the first company to introduce GPS technology as a body-worn device

ISAP IV DEPARTMENT OF HOMELAND SECURITY   Solicitation Number: 70CDCR19R00000002 | July 1, 2019
Intensive Supervision Appearance Program

Section 1 | **TECHNICAL**

A key aspect of our employee engagement and retention efforts is our dedication to being an Employer of Choice; we offer initiatives regarding engagement, recognition, and incentives:

- *Engagement.* BI implements proactive "Goal Worksheets" and "Stay Interviews" to help Program Managers understand staff experiences, receive feedback on program and company operations, and facilitate changes in staff performance.

- *Recognition and Incentives.* BI uses performance metrics to recognize employees and ISAP offices that exceed benchmarks. We also reward exceptional employee efforts that support ERO's Mission. For example, BI recognizes ISAP offices that consistently produce excellent compliance results at annual, internal conferences.

- *Understanding of Company Mission.* We make continued efforts to foster employee understanding of our company mission. We explain company values, principles, and fundamentals in detail during staff training and regular employee meetings. Employees who believe in BI's mission and vision are more likely to stay with us for the long-term.

Retention and Promotion: Emerging Leaders Program. A key component of BI's succession planning is our ISAP Emerging Leaders Program. Each year, 10-12 Case Specialists with demonstrated mastery of the Case Specialist role undergo a rigorous application and interview process. Those invited to attend the three-day intensive leadership academy do the following:

- Work closely with BI and GEO leadership
- Attend courses geared towards enhancing leadership skills
- Complete a group project on an assigned topic and present their work to company leadership
- Continue to engage in leadership development activities with an assigned company mentor

⑥ MANAGE DISCIPLINARY ACTIONS AND REMOVALS

To encourage employee retention, we offer competitive salaries, tuition reimbursement, and a generous benefit package. In our experience, implementing BI's Staffing Plan inherently reduces the risk of disciplinary actions and removals. However, with a nationwide program the size and scope of ISAP IV, some terminations and disciplinary actions are unavoidable.

BI uses a progressive disciplinary policy for non-disqualifying events, including verbal and written counseling up to and including termination. BI will notify the COR and Alternatives to Detention (ATD) immediately upon learning of adverse or disqualifying information about any employee. That same

> **Reducing Staff Stress**
>
> *Implementing BI's Staffing Plan and verifying offices are within required ratios inherently reduces staff stress, encourages retention, and minimizes turnover.*

day, BI will place the employee on administrative leave and remove the employee from the performance of duties under all U.S. Department of Homeland Security (DHS) contracts. BI staff will coordinate with the COR to determine if additional investigation is required. Issues of employee misconduct will be referred to the GEO Group's Office of Professional Responsibility, which will verify that all allegations are promptly reported and investigated. We will also complete a Termination Checklist and communicate with designated Government individuals, in accordance with *RFP Section H.3.1*. Our policies and procedures comply with all *Removal from Duty* requirements detailed in *RFP Section C.5.d.*

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⑦ REPORT STAFFING INFORMATION

BI remains committed to continually updating ERO on ratios, staffing changes, recruitment and hiring efforts, and suitability processes. We will communicate staffing information with ERO in a formal *Monthly Employee Roster* and on a daily, local level with all key ISAP personnel, as required by *RFP Section C.4.a.* This roster includes staffing ratios by location and a clear calculation of staffing surpluses and deficiencies. In addition, BI will continue to report employee terminations and resignations within five days of occurrence.

Qualifications of Personnel

ISAP must be staffed with employees who have the specific behaviors, traits, and qualifications needed to succeed on the job. BI's ISAP staff work to actively build relationships with participants through bilingual communications and multicultural appreciation. This understanding, combined with our staff's knowledge of the immigration system, results in improved compliance and overall support of ERO's Mission.

BI ISAP employees understand that programmatic success relies on a balance between intensive supervision and supportive stabilization. This combination of case management, compliance, and electronic monitoring expertise is unique and critical to ISAP IV success. The following figure summarizes our staff qualifications and education. Please see Appendix A—Resumes for detailed personnel qualification information.

STAFF QUALIFICATIONS AND EDUCATION
BI's existing ISAP workforce is highly educated in areas relevant to successful ISAP operations, greatly exceeding RFP requirements.
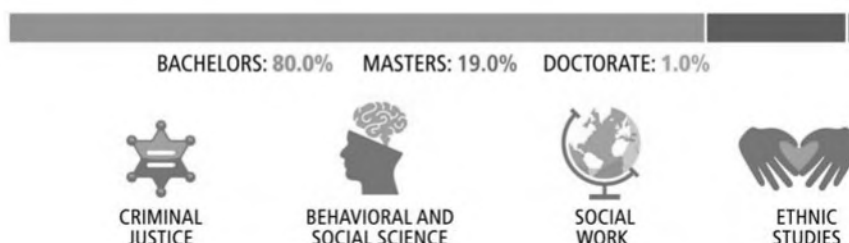
BACHELORS: 80.0%   MASTERS: 19.0%   DOCTORATE: 1.0%

CRIMINAL JUSTICE   BEHAVIORAL AND SOCIAL SCIENCE   SOCIAL WORK   ETHNIC STUDIES

Figure 3. Staff Qualifications

Key Personnel Qualifications

In accordance with *RFP Section C.4.b*, key personnel include the ISAP Program Director and Deputy Director. These personnel are critical to the success of our ISAP IV solution.

(b)(7)(C) *ISAP IV Program Director.* Formerly the ISAP III Deputy Director, (b)(7)(C) brings a wealth of ISAP operations knowledge, including managing a nationwide workforce; providing on-call, 24-hour support to ERO ATD; and implementing new immigration supervision solutions. (b)(7)(C) joined the BI ISAP team in 2010 as a Regional Manager, and he remains committed to supporting the ISAP IV mission for the ensuing contract.

Prior to joining BI, (b)(7)(C) had a nearly 10-year career in community corrections settings in halfway houses that served the Bureau of Prisons, U.S. Federal Probation, and State of

Pennsylvania offenders. Beginning his career at the Bureau as a Case Manager, he was promoted to Vice President of Correctional Services. In this leadership and program oversight role, (b)((b)(7)(C) managed seven community corrections centers throughout Eastern Pennsylvania with a capacity of 725 offenders and oversaw 170 employees.

(b)(7)(C) *ISAP IV Deputy Director.* Newly appointed to the Deputy Director role, (b)(7)(C) brings vast experience managing large-scale operations to our ISAP IV solution. (b)(7)(C) has led teams of talented, cross-functional professionals across multiple locations, overseeing operations in compliance with contractual requirements. (b)(7)(C) joined BI's ISAP operations in 2008 as a Case Specialist and will leverage his 10 years of experience supporting positive outcomes, engaging with ERO, and developing community connections. Prior to his promotion, he was responsible for overseeing 17 ISAP locations throughout the Northeastern United States, with authority over a team of 150 BI employees. His ability to envision, develop, and deploy innovative strategies to improve processes, operations, and compliance will be instrumental to successful ISAP IV operations.

The table below summarizes key personnel qualifications.

Table 4. Key Personnel Qualifications

RFP Requirement	Program Director (b)(7)(C)	Deputy Director (b)(7)(C)
Bachelor's Degree in Appropriate Discipline	Master of Science, Criminal Justice; Bachelor of Science, Criminal Justice **_Exceeds_**	Bachelor of Arts, Criminal Justice
Years of Experience, Certification, and Credentials Applicable to ISAP Objectives *Includes: communicating, directing, counseling, and evaluating subordinate staff operating a community program with similar goals and objectives*	16 Years **_Exceeds_** *RFP requirement for 10 years*	9.5 Years **_Exceeds_** *RFP requirement for 5 years*
Availability and Commitment to This Effort	Available 24/7/365, Statement of Commitment in Appendix A	Available 24/7/365, Statement of Commitment in Appendix A
Demonstrated Understanding of RFP SOW	9-year tenure with ISAP	10-year tenure with ISAP
Percentage of Time Devoted to Contract	100%	100%

Key Personnel Duties. BI confirms that our proposed key personnel meet all requirements and are fully committed to upholding their duties, including:

- The Program Director will be responsible and accountable for the overall execution and administration of the program and act as a single point of contact for ERO.

- In accordance with *RFP Section C.4.a* and *HSAR 3052.215-70*, in the unlikely event that BI terminates key personnel, we will seek approval from the COR and Contracting Officer (CO) prior to assigning a replacement. We will have a full-time replacement in place within 90 days of key personnel vacancy unless a waiver is granted by the COR.

- Per *RFP Section C.6.11*, the Program Director, (b)(7)(C) and Executive Vice President of Immigration Services, (b)(7)(C) will meet with ERO at a frequency determined by the CO and/or COR to provide management-level review and assessment of contractor performance and resolve any program issues. BI will provide the agency with written minutes of the meetings within five days of occurrence.

- BI appoints (b)(7)(C) Vice President of Software Solutions and IT, as our ISAP IV Corporate Security Officer. (b)(7)(C) areas of expertise are summarized in SME Experience and Qualifications.

Other Personnel Qualifications

As part of our Staffing Plan, we will recruit and retain highly qualified staff to support ISAP IV objectives. The following table summarizes other personnel qualifications at contract inception.

Table 5. Qualifications of Other Personnel	
Qualifications	**Duties**
Executive Vice President of Immigration Services *NEW to ISAP IV operational structure* | *Exceeds RFP Requirements*	
Experience with public administration, criminal justice, social work, psychology, business, or related field required	Support the ISAP Program Director through formal reporting and communication with DHS.
At least 10 years large-scope project management experience	Analyze program trends and patterns and recommend appropriate changes.
10 years of professional experience in contract administration	Support customer relationships at the Headquarters level.
10 years of experience in a supervisory capacity	Oversee and develop training specific to program performance and fidelity.
7 years of experience working with multicultural contacts	Oversee annual performance and fidelity audits and evaluations of operations for compliance with established procedures that influence program outcomes.
Knowledge of federal acquisition process, Government contracting principals, and governing regulations (FAR)	Be accessible to ERO by phone 24/7/365.
Regional Operations Manager (b)(*ISAP IV Regional Managers* | *100% committed and dedicated to ISAP IV* | *Exceeds RFP Requirements*	
Bachelor's degree in sociology, psychology, social work, criminal justice, or a related field required; Master's degree preferred	Act as a single point of contact for ERO field and Headquarters personnel assigned to oversee C-site, G-site, and S-site ISAP IV locations on a 24/7/365 basis.
At least 5 years of supervisory experience in a similar program required	Provide operational and financial oversight of all C-, S-, and G-sites in their respective assigned Area of Responsibility (AOR).
At least 2 years of experience working with multicultural clients	Verify that all contract requirements are met and all work is of the highest quality.
	Be accessible to ERO by phone 24/7/365.

Table 5. Qualifications of Other Personnel

Qualifications	Duties
Regional Technology Manager (b)(4) *ISAP IV Technology Managers | 100% committed and dedicated to ISAP IV | Exceeds RFP Requirements*	
Bachelor's degree in criminal justice, business administration, or related field required Minimum of 5 years of experience working in corrections/electronic monitoring industries	Act as the single point of contact for ERO field and Headquarters personnel assigned to oversee T-sites on a 24/7/365 basis. Assist ISAP Regional Operations Managers, Program Managers, and ERO Field Offices with all electronic monitoring and case management technology needs, including training, equipment delivery, personnel availability, and inventory control. Verify and support contract compliance for all T-site services, including court tracking and alert management. Supply T-sites with electronic monitoring units. Be accessible to ERO by phone 24/7/365.
Program Manager (b)(4) *ISAP IV Program Managers | 100% committed and dedicated to ISAP IV*	
Bachelor's degree in a related discipline from an accredited institution At least two years of documented experience in a field related to law, social work, detention, corrections, or similar Certification, licensure, and credentials applicable to the professional accreditation of the position Demonstrated experience applicable to ISAP goals sufficient to communicate with other staff and appropriate for a similar program environment	Meet the minimum requirements as established to be a Case Specialist. Supervise Case Specialists and Administrative Assistants. Demonstrate proficiency in performing all duties of a Case Specialist and ability to train new Case Specialists. Maintain current training and certification requirements in accordance with state and Immigration and Customs Enforcement (ICE)/ERO standards. Be accessible to ERO by phone 24/7/365.
Deputy Program Manager: *New to ISAP IV operational structure* (b)(*ISAP IV Deputy Program Managers | 100% committed and dedicated to ISAP IV | Exceeds RFP Requirements*	
Bachelor's degree in a related discipline from an accredited institution At least one year of documented experience in a field related to law, social work, detention, corrections, or similar Certification, licensure, and credentials applicable to the professional accreditation of the position Demonstrated experience applicable to ISAP goals, sufficient to communicate with other staff, and appropriate for a similar program environment	Meet the minimum requirements as established to be a Case Specialist. Assist with supervising Case Specialists and Administrative Assistants. Demonstrate proficiency in performing all Case Specialist duties and training new Case Specialists. Maintain current training and certification requirements in accordance with state and ICE/ERO standards. Be accessible to ERO by phone 24/7/365.

Table 5. Qualifications of Other Personnel	
Qualifications	**Duties**
Senior Case Specialists: *New to ISAP IV operational structure* (b)(4) *ISAP IV Senior Case Specialists* | ***100% committed and dedicated to ISAP IV*** | ***Exceeds*** *RFP Requirements*	
Bachelor's degree in an appropriate discipline from an accredited university At least 2 years of documented experience in a field related to law, social work, detention, corrections, or similar Certification, licensure, and credentials applicable to the professional accreditation of the position Demonstrated experience applicable to ISAP goals, sufficient to communicate with staff, and appropriate for a similar program environment.	Perform all Case Specialist key responsibilities. Provide all contract services required at G site locations. Act as a single point of contact for designated ERO personnel responsible for oversight at the assigned G-site. Support the Program Manager with operational and financial oversight at C-sites with a participant population over 600. Be accessible to ERO by phone 24/7/365.
Case Specialist (b)(4) *ISAP IV Case Specialists* | ***100% committed and dedicated to ISAP IV***	
Bachelor's degree in an appropriate discipline from an accredited university, **exceeding** qualifications Bilingual skill set preferred At least two years of documented experience in a field related to law, social work, detention, corrections, military/civil service, or similar occupational area Certification, licensure, and credentials applicable to the professional accreditation of the position Demonstrated experience applicable to ISAP goals sufficient to communicate with other staff and appropriate for a similar program environment	Provide program services to participants in accordance with this SOW and required by ERO. Direct communication with program participants and ERO. Create participant service plans. Maintain electronic *Case Records*. Execute *Case Management Plans* in accordance with this SOW and as required by ERO. Maintain current training and certification requirements in accordance with state and ICE/ERO standards.
Administrative Assistant (b)(4) *ISAP IV Administrative Assistants* | ***100% committed and dedicated to ISAP IV***	
Associate's degree in an appropriate discipline from an accredited institution OR two or more years of relevant experience At least two years of experience working with computers Demonstrated experience applicable to ISAP goals, sufficient to communicate with other staff and appropriate for a similar program environment	Communicate with program participants in the office. Assist Case Specialists in providing program services to participants and with duties performed during office visits. Maintain *Case Records* and systems. Assist the Program Manager as needed. Maintain current training and certification requirements in accordance with state and ICE/ERO standards.

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Subfactor 2—Operations Plans

With a solid *Staffing Plan* in place, BI's *Operations Plans* provide the roadmaps that enable ISAP staff to deliver contract requirements. Within each *Operations Plan,* BI strives to differentiate ourselves as the lowest risk, highest value provider capable of delivering all ISAP IV functions. The following table summarizes the key *Tasks and Deliverables* (as detailed in *RFP Section C.7.0*) and BI's corresponding response location.

Table 6. Ability to Perform ISAP IV Tasks and Deliverables
#	Description	Proposal Response Location
1	Conduct and Document Internal Quality Assurance Audits	Quality Control Plan
2	Develop and Implement Case Management System	Technology Plan, Appendix B
3	Develop and Implement Mobile Application	Technology Plan, Appendix B
4	Create and Maintain Case Records Electronically	Records Management and Reporting Plan
5	Conduct Program Enrollments and Orientations	Case Management Plan
6	Develop Individual Service Plans (ISPs) for Participants	Case Management Plan
7	Conduct Face-to-Face Interviews with Participants	Case Management Plan
8	Provide and Monitor GPS, Reporting, and (b)(7)(E)	Technology Plan, Appendix B
9	Maintain GPS Equipment Inventory	Technology Plan, Appendix B
10	Provide Translator Services	Case Management Plan
11	Develop and Enforce Employee Standards of Conduct	Staffing Plan
12	Contractor Personnel Report	Records Management and Reporting Plan
13	Contractor Staff Training Report	Records Management and Reporting Plan
14	Report Requirements	Records Management and Reporting Plan
15	Monthly Program Review	Qualifications of Personnel
16	Facilities Plan	Operational Plans, Appendix F
17	Training Plan	Operational Plans
18	Transportation Plan	Operational Plans
19	Emergency Readiness and Continuity of Operations Plan	Operational Plans
20	Security Plan	Operational Plans

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Case Management Plan

1 **ESTABLISH SCOPE AND RESOURCES**

2 **ACCEPT REFERRALS AND PERFORM ENROLLMENT**

3 **SUPERVISE ALL ASPECTS OF THE PROGRAM**

4 **DOCUMENT AND REPORT ACTIVITIES**

STATEMENT OF COMPLIANCE

Applicable RFP Sections:
Scope of Work: C.3; C.5; C.6; C.7
Instructions: L.6
Evaluation: M.2
Attachments: 5; 6

To accommodate ICE enforcement requirements, ERO requires an agile ISAP IV solution that manages and monitors thousands of participants while driving positive outcomes. Successful ISAP IV operations require a continuum of flexible case management services and technologies to monitor participants at every stage of the immigration process. Throughout the performance of ISAP IV, BI will support ERO by supervising participants while they are involved in removal proceedings. The following figure summarizes our approach to managing ISAP IV.

ISAP APPROACH TO CASE MANAGEMENT

BI's services and technologies are built on decades of experience with criminal justice populations and 15 years of experience supporting ISAP.
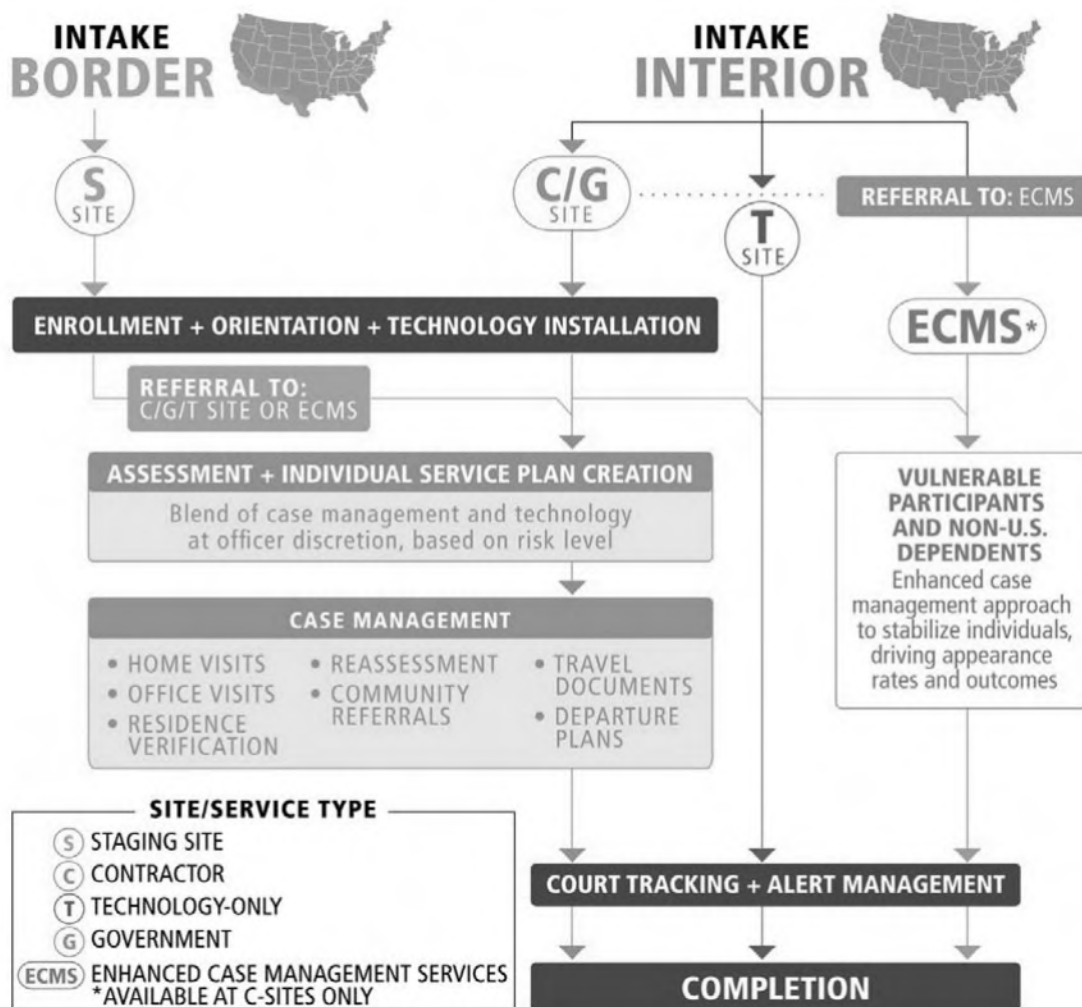

Figure 4. Overview of ISAP IV Operations

All aspects of BI's *Case Management Plan* will also apply to ECMS participants, per RFP *Attachment 2*. *Appendix B* describes our approach to managing the ECMS component of ISAP.

Experience Matters. BI has 89 established ISAP G-sites, C-sites, and S-sites; has more than (b)(4) trained and experienced ISAP III-dedicated staff; and made approximately 50,000 referrals throughout ISAP III. BI is the only industry vendor with the resources to support effective case management for ISAP nationwide. BI's proven case management and supervision approach will continue to result in accurate, transparent, and improved outcomes throughout ISAP IV.

Our *Case Management Plan* provides effective planning and execution of all case management activities. Every component of our case management model meets program objectives—increasing compliance rates, increasing appearance rates, and reducing absconder rates.

❶ ESTABLISH SCOPE AND RESOURCES

BI's *Standard Operating Procedures* will guide all aspects of services, providing automated workflows and consistent methods by which BI will deliver ISAP IV services in accordance with *Service and Site Type* requirements in the *RFP SOW* and as summarized in the following chart.

Table 7 Scope of ISAP IV Operations

Service	C-site	G-site	S-site	T-site
Referral Received	✓	✓	✓	
Enrollment	✓	✓	✓	
Orientation	✓	✓	✓ *abbreviated*	
ISP	✓	✓		
Travel Document Assistance	✓	✓		
Equipment Installation	✓	✓	✓	
Community Referral Coordination	✓	✓		
Electronic Monitoring	✓	✓	✓	✓
Court Tracking	✓	✓	✓	✓
Alert Management	✓	✓	✓	✓
Case Management: *Home Visits, Office Visits, Residence Verification*	✓	✓		
ECMS Services	✓			

Establish Operational Chain of Command

BI's operational structure is designed to administer the program logically and provide avenues of clear communication. Key management personnel will oversee local, regional, and national functions. As summarized below, BI has carefully established regions, chains of command, and operational functions to support ISAP IV.

ISAP OPERATIONAL STRUCTURE
BI has expanded our operational structure in anticipation of ISAP IV growth.
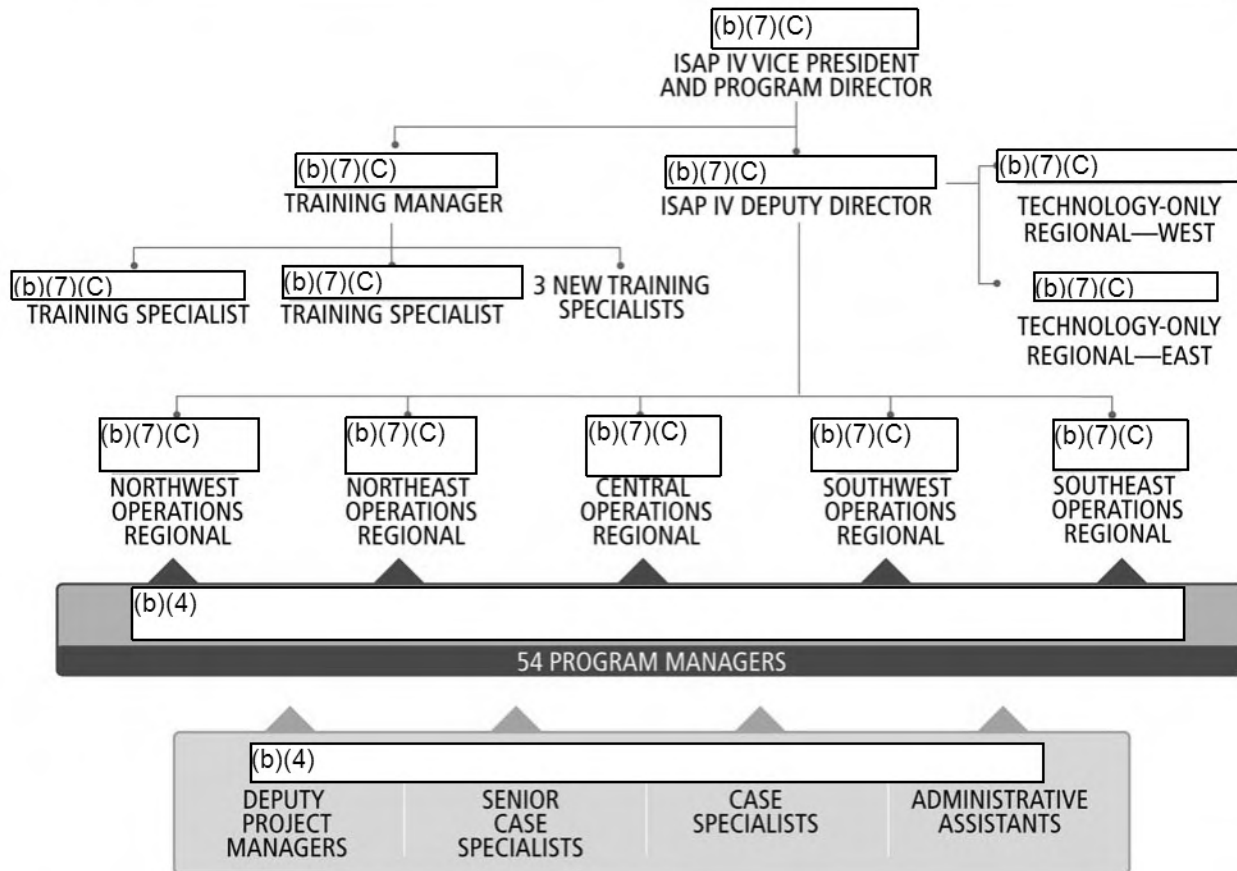
Figure 5. Operational Structure

Implement Geographical Full Service Radius

In accordance with *RFP Section C,* BI will provide residence verifications and home visits, at the direction of ERO, when participants reside within 75 miles of an ISAP C-site or G-site. As the incumbent provider, with 75 C-sites and G-sites located across the nation, BI is prepared to provide case management services across the country (see Appendix F). Local experience and

(b)(7)(E)

ISAP IV DEPARTMENT OF HOMELAND SECURITY   Solicitation Number: 70CDCR19R00000002 | July 1, 2019
Intensive Supervision Appearance Program

Section 1 | **TECHNICAL**

Provide Service Delivery Tools

Our ISAP IV solution includes technologies, applications, and other resources critical to capturing and reporting compliance data. BI ISAP employees will use the following support tools, systems, and practices to effectively deliver ISAP IV services described in this section.

Automated Case Management System: BI TotalAccess. Our proprietary case management platform, (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

BI has worked diligently with ERO since the inception of ISAP to provide a highly customized software solution that increases efficiencies, streamlines communications, and provides critical monitoring data to users in the field. We designed all of the case management functions in TotalAccess specifically to provide services to ERO. No other provider in the industry can offer this level of customization in a case management software platform on day one of the contract.

TotalAccess Mobile (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

Manual Case Management System: Staff Interaction with Participants. Supporting participant compliance extends beyond technology solutions that track movements and ISAP participation. BI's solution includes case management services that provide face-to-face interaction between participants and our tenured, highly experienced staff. From enrollment, to developing court transportation plans, to providing referrals to local resources, BI's workforce is trained to deliver case management services in a consistent, respectful manner to drive positive program outcomes.

Improved Staff Oversight and Safety. Improvements to TotalAccess (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

Transportation and Technology Peripherals: Supporting In-Field Activities. BI has company-owned or leased vehicles at every ISAP location, established fleet management practices, and in-vehicle diagnostics technology. Our vehicle contingency procedure uses rental car contracts in the unlikely event a BI fleet vehicle is unavailable.

Our proven fleet management procedures mitigate the risk of mechanical failures, suspended or revoked licenses, and expired registrations or inspections. Every ISAP vehicle is equipped (b)(7)(E) (b)(7)(E) (b)(7)(E) All of these procedures promote safety, accountability, and increased productivity, **exceeding** requirements.

Safe, Reliable Transportation
BI has more than 120 vehicles in our established, nationwide ISAP fleet. Installation of (b)(7)(E) *in 2017 has further enhanced safety.*

In addition to transportation resources, BI provides tools to support Case Specialists with conducting office and home visits, as summarized by the following table.

Table 8. Technology to Support Case Management

Technology	Peripherals	Supports
Office Visit Tablets	TotalAccess Mobile, (b)(7)(E) (b)(7)(E)	Expedites office visits, increases data accuracy, and (b)(7)(E)
Smartphone	TotalAccess Mobile, (b)(7)(E) (b)(7)(E)	Verifies home visit/residence, (b)(7)(E) (b)(7)(E) while in the field.
Document Capture	TotalAccess Mobile, SmartLINK	Uploads (b)(7)(E) into TotalAccess.

Access to Government Information. Based on each participant's progress through the immigration system, BI will regularly access Public Access to Court Electronic Records (PACER), Executive Office of Immigration Review (EOIR) court line, and other relevant public systems to acquire updated information about participant court status and appearance schedules.

② ACCEPT REFERRALS AND PERFORM ENROLLMENT

BI will accept all participant referrals from ERO, including T-site participants who may reside any distance from ERO locations. We anticipate that ERO will use *RFP Attachment 5—ATD Enrollment Form* to begin the referral process. This form will document the specific combination of supervision technologies and case management services designated by ERO officers. Upon receipt of this form, BI will complete the enrollment within one business day. BI will also accept the *ATD Enrollment Form* when officers have a change-in-service request or termination. These requests will be completed within one business day.

BI will always accept paper documents from ERO to meet contractual requirements. We will also maintain records in accordance with DHS standards. However, as detailed in our *Records Management and Reporting Plan,* our solution includes an efficient virtual document capture system (b)(4); (b)(7)(E)

Complete Enrollment and Orientation

BI anticipates that most enrollments will occur in office and during normal business hours. However, as the program operates 24/7/365, BI understands that some enrollments will be required after hours or in the field, with accompaniment from an ERO officer. When enrollments in the field are required, BI will provide a partial enrollment to expedite the process and

complete the full enrollment in-office within 24 hours or on the next business day, per *RFP* requirements. BI has a proven history of rapidly responding to off-hour activity. When ERO calls on BI for after-hour support, we consistently deliver.

Communicating with Participants. During enrollment, BI Case Specialists will communicate with participants in a language they understand. Our staff can accommodate most participant languages—96% of our ISAP staff who interact directly with participants speak two or more languages. BI will also leverage our translation services to clarify program requirements and the role of Case Specialists to participants. Additional materials and methods BI will use to communicate critical ISAP information to participants are detailed in the following table.

Table 9. Communicating Program Requirements to Participants

Material or Method		Material or Method	
Program Rules and Orientation Acknowledgement Form	✓	Program Information Handbook *in participant's language*	✓
Consent to Release Information Forms	✓	ERO-Approved Pro Bono Legal Service Providers	✓
Participant Agreement Electronic Monitoring Form	✓	ERO-Approved Orientation Video	✓
Participant Schedule	✓	List of Referrals to Community Service Providers	✓
Assessment Form	✓	ERO-Approved Orientation Video	✓
Individual Service Plan *updated every month or at each office visit*	✓	ATD Program Participants Rules *per RFP Section C.6.1.f*	✓
Court Appearance Contract Form	✓	Operating Technology Written Instructions	✓

We understand ERO will provide *Placement Worksheet, Orders of Release, Orders of Supervision, Immigration Charging Documents,* and the *ATD Enrollment Form* in English.

All TotalAccess documents provided to the participant will be in their native language. Our new, advanced (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E) On an annual basis, BI will work with ERO to adjust and enhance vernacular requirements to address program needs.

(b)(4); (b)(7)(E)

Case Management Enrollment Interview. During enrollment, BI staff will interview participants using evidence-based case management techniques to gather information about needs and risks. Depending on the service type selected, BI may perform some or all enrollment and orientation activities. For example, at S sites BI will perform partial enrollment services, while at C-sites and

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G-sites BI will complete all orientation services. During enrollment and orientation, BI Case Specialists will complete the following activities in a language the participant understands:

- Create an initial record in TotalAccess, collecting schedule and contact information, points of contact, and telephone numbers, as well as linking participants, as needed.

- Discuss the home visit schedule at ERO-discretion.

- Provide an overview of the program, rules, regulations, procedures, and progression.

- Install technology, verify functionality, and explain reporting requirements.

- Assign court tracking and alert management services at ERO discretion.

- Record demographic information (per *RFP C.6.1.f*).

- Explain the consequences of violations.

- Explain the Immigration Court appearance process and provide court information.

- Complete all required documentation, including participant and Case Specialist signature, when appropriate. (See Communicating Program Requirements to Participants)

- Issue ID cards. With permission from ERO, (b)(7)(E) (b)(7)(E) **exceeding** *RFP* requirements.

- Document all orientation and enrollment activities in TotalAccess.

- Schedule an in-person Know Your Rights presentation, with handouts, for C-site participants. S-site participants will watch an ERO-approved video and receive a handout (**exceeding** requirements) prior to receiving an in-person Know Your Rights presentation at their C-site destination.

- Conduct Cultural Orientation presentations.

Individual Service Plans. BI will develop an ISP for each participant in TotalAccess that details supervision, legal, translation, transportation, travel document, departure, and community referrals. We will update the ISP during office visits as the participant's status and needs change. All ISPs and updates will be signed by the participant using our new fingerprint process.

③ SUPERVISE ALL ASPECTS OF THE PROGRAM

Verify Participant Residences

Verifying that participants have stable, safe, and appropriate living spaces provides ERO with additional supervision information and confirms participants are complying with program rules. ERO officers can also direct BI to perform residence verifications as part of the enrollment process. Residence verification will not be performed in conjunction with home visits. This process closely mirrors our *Home Visit Standard Operating Procedure* (see Conduct Office Visits), and BI staff will gather initial information about the residence to support future home visits. We will perform residence verifications within 48 hours of completing enrollment or receiving information about an address change. If a participant fails a residence verification, BI will enact the procedure detailed in Missed Home or Office Visit Procedure.

Acquire Travel Documents

Travel documents are critical to compliance with Final Orders of Removal, but many participants do not have passports or other necessary departure documentation. BI staff will encourage participants and their family members, subject to ERO's instructions, to acquire travel documents

	Proven Travel Document Capabilities
	BI collected more than 86,500 travel documents in the first four contract years of ISAP III.

by providing passport applications and other travel document information. BI's travel document acquisition approach **exceeds** *RFP* requirements and includes the following steps:

- Store the document in the (b)(7)(E) for officer review.

- Verify that the participant calls the consular embassy to update travel document progress. BI will not deal directly with any foreign government consulates.

- Document and track travel document application and information in (b)(7)(E) including passport numbers, validity dates, and tracking numbers.

- Generate and review reports to monitor expiration dates and advise participants to reapply for soon-to-expire travel documents.

When BI ISAP staff receive travel documents from a participant, we will notify ERO, scan the document into (b)(7)(E)
(b)(7)(E)

Conduct Office Visits

Ongoing, face-to-face contact with participants is critical to effective case management. BI will meet with participants at ERO or BI-operated locations to assess program compliance, document all activities (b)(7)(E) and

	Proven Office Visit Capabilities
	BI completed more than 2 million office visits during the first four contract years of ISAP III.

address and document violations. If at any time a BI Case Specialist determines that a participant is noncompliant with program rules and requirements, BI will notify ERO. Our *Office Visit Standard Operating Procedure* includes the following key activities:

1. (b)(7)(E)

2. Verify and communicate status of removal proceedings and next court action via PACER, BIA, and EOIR court lines.

3. Confirm contacts and residence information.

4. Document any employment information and changes in appearance.

5. Verify phone numbers for the participant, family, and friends are accurate and linked in (b)(7)(E)

6. Update passport/travel document progress and *Departure Plans*, and notify ERO.

7. Ask the participant about contact with law enforcement and check all available databases.

8. Make copies of any foreign identity or legal documents, add these documents to the (b)(7)(E) notify ERO within 24 hours, and forward copies to ERO.

9. Collect passports or travel documents, with participant consent.

10. Confirm the next scheduled office visit, home visit, court date, and ERO appointment.

11. Develop *Court Transportation Plans* to support participant attendance at required appointments and court events.

12. (b)(7)(E) check the GPS unit to verify functionality, and make live contact with ERO if there is evidence of tampering.

13. Review, update, and sign the Individual Service Plan (ISP).

14. Discuss participant stability and basic life needs and make appropriate community referrals. BI will use the (b)(7)(E) to issue referrals and track participant utilization.

15. Document *Case Notes* and all other office visit activities in (b)(7)(E)

(b)(4); (b)(7)(E)

(b)(7)(C)

Missed Home Visit, Office Visit, or Residence Verification Procedure. If a participant misses a home visit, office visit, or residence verification, BI will execute the following procedure:

1. (b)(7)(E)
2.
3.
4.

Absconder Standard Operating Procedure. If the participant is not located, BI will execute the following procedure:

1. (b)(7)(E)
2.
3.
4.
5.

(b)(4); (b)(7)(E)

Conduct Home Visits

Verifying that participants are stable within the community and checking for signs that a participant may abscond are integral components of supervision. When designated by ERO, BI Case Specialists will perform home visits at

> **Proven Home Visit Capabilities**
>
> *BI completed more than 1 million home visits during the first four contract years of ISAP III.*

participant residences within 75 miles of an ISAP IV C-site or G-site. ERO officers designate home visit frequency, and a BI Case Specialist will conduct a home visit 48 hours after enrollment if residence verification services are not selected. If home visits are used in conjunction with residence verification services, BI will conduct the visits at the fixed intervals indicated by ERO, beginning the day after residence verification. BI will discuss the frequency and schedule of home visits with the participant during enrollment and orientation.

Our *Home Visit Standard Operating Procedure* includes the following activities:

1. (b)(4); (b)(7)(E)

   exceeding *RFP* requirements.

2. Enter the participant's home (b)(4); (b)(7)(E)

   (b)(4); (b)(7)(E)

3. (b)(7)(E)

4. Document all relevant information within (b)(7)(E) including the following:

   a. (b)(4); (b)(7)(E)

   b.

   c.

   a.

   b.

5. Discuss the next scheduled visit, court status updates, etc., as needed.

If at any time a BI Case Specialist has safety concerns, the Case Specialist will immediately abort the visit and contact their supervisor and ERO.

(b)(4); (b)(7)(E)

Unsuccessful Home Visits. If a participant is not present at the time of the home visit, BI will (b)(4); (b)(4); (b)(7)(E) (b)(4); (b)(7)(E) If the participant does not allow the Case Specialist inside the residence, we will notify ERO of the failure in accordance with established notification procedures.

Perform Court Tracking

Our established U.S. Department of Justice (DOJ) EOIR tracking approach supports compliance with court tracking processes detailed in *RFP Section C.6.1.a*, including processing EOIR hearings, Board of Immigration Appeals, and Circuit Court or higher appeals. Our methods resulted in 99% of ISAP III participants attending EOIR hearings.

(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E) ERO officers can use this feature to determine court dates. The figure below shows the court tracking process.

IMMIGRATION COURT PROCESS

BI's established and improved immigration court tracking process supports participant appearance rates.

ENCOUNTER WITH ICE

NOTICE TO APPEAR ISSUED → MASTER CALENDAR HEARING → INDIVIDUAL MERITS HEARING → IMMIGRATION JUDGE DECISION

MASTER CALENDAR HEARING → IMMIGRATION JUDGE DECISION

IMMIGRATION JUDGE DECISION: RELIEF, TERMINATION OF PROCEEDINGS, REMOVAL, VOLUNTARY DEPARTURE

ALIEN APPEAL TO FEDERAL COURT

ICE OR ALIEN APPEAL TO BIA

REMOVAL/ DEPARTATION

FAILURE TO DEPART

KEY
● COURT LINE CALLED:
- WEEKLY UNTIL COURT DATE
- DAY BEFORE
- DAY OF
- TWO DAYS AFTER
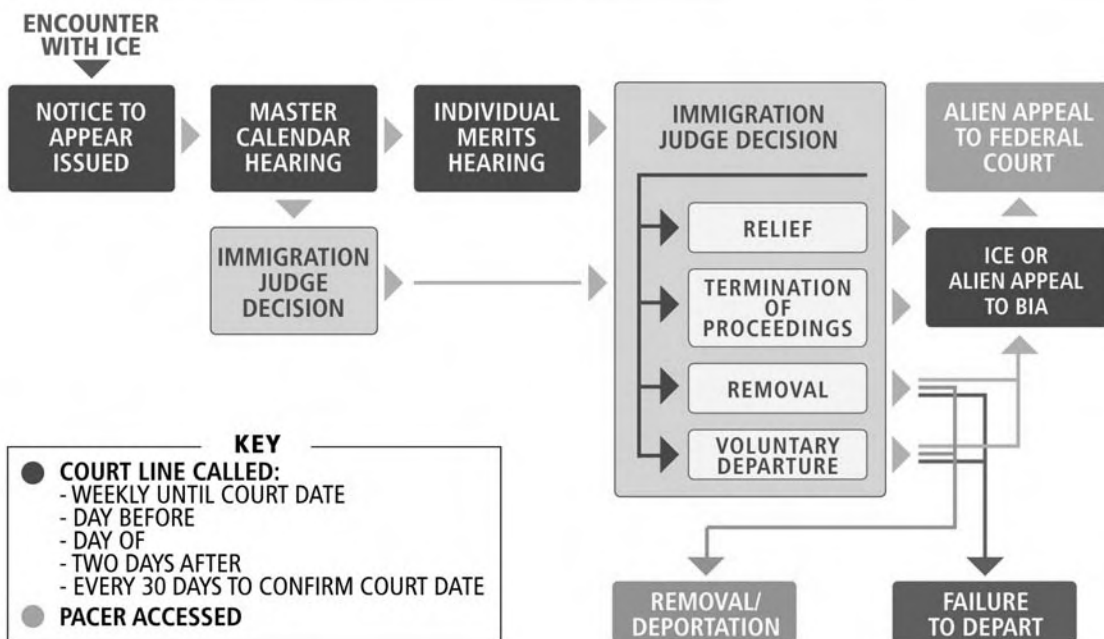- EVERY 30 DAYS TO CONFIRM COURT DATE
● PACER ACCESSED

Figure 6. Supporting Participant Court Appearance Rates

Established Processes. The following table summarizes court tracking processes.

Table 10. Court Tracking Processes			
Tracking Activity	**EOIR**	**BIA**	**Federal Appeals**
A. Hearing Dates and Results			
1. Call EOIR court line weekly to obtain hearing information, including the date, time, and location of a participant's next scheduled hearing.	✓		
2. Call EOIR court line or access PACER weekly for hearing or appeal results.		✓	✓
3. Contact ERO, Task Manager, and HQ every 30 days, until a hearing is scheduled. Document each attempt in TotalAccess and notify ERO.	✓		
4. Notify the participant within 24 hours by phone, office visit, or home visit once a hearing is scheduled. Notify ERO regarding the scheduled court date within 24 hours. Document activities in (b)(7)(E) notify the participant and ERO.	✓		
5. Call the court line at least once every 30 days to verify the scheduled date.	✓		
6. Provide an updated ISP that includes the date, time, and location of the next scheduled hearing (**C-site, G-site**).	✓		
7. Secure the participant's signature on a *Court Appearance Contract* and document the action in (b)(7)(E) (**C-site, G-site**).	✓		
8. Develop a primary and backup *Transportation Plan* to help participants appear on time for their scheduled court date. The plan includes the mode of travel; the date, time, and location of the hearing; and turn-by-turn directions. Provide participants with detailed public transportation instructions (**C-site, G-site**).	✓		
9. Remind the participant of the upcoming court date during every phone contact, office visit, and home visit. Call participants 24 hours prior to the scheduled hearing. (b)(4); (b)(7)(E) (b)(4); (**C-site, G-site, T-site**).	✓		
B. Track Decisions			
1. Require participants to report to their assigned office after attending scheduled hearings within the same business day but no later than the next business day (**C-site, G-site**).	✓		
2. Obtain, verify, and record the results of hearings and decisions in (b)(7)(E)	✓	✓	✓
3. Notify ERO via email or as otherwise directed by ERO.	✓	✓	✓
4. Contact the Court Clerk to obtain date-of-mandate issuance			✓
5. Direct BI to change supervision levels depending on the result of the hearing or decision. Document changes and update the ISP and legal stage for C-site and G-site participants. Immediately notify ERO if a participant refuses to sign the updated ISP.	✓	✓	✓

Process Alerts and Notify ERO

BI's established procedures guide ISAP and monitoring personnel through the alert management process, either promptly resolving alerts or escalating events to ERO. BI's advanced monitoring technologies, customized software, tenured staff, and alert management procedures support timely, accurate notification and free up valuable officer time by helping to manage workloads. The following table summarizes the types of alerts generated by BI equipment.

Table 11. Alert Types	
Activity or Document	**Alert/Data**
GPS Alerts *LOC8*	(b)(4); (b)(7)(E)
Biometric Alerts *SmartLINK*	
Voice Call Alerts *VoiceID*	
Summary of Exception and Open Alerts Report *Sent weekly to AMO*	

In accordance with *RFP Section C.6.10.2,* BI will also provide *Alert and Exception Daily Reports* that send weekly information about unresolved alerts to each ATD location. In addition, we will send *Alert and Exception Reports* to ATD locations, AORs, Regions, and Nationwide. These reports will summarize alerts that remain unresolved for more than 72 hours.

Flexible, Reliable Alert Procedures. As ISAP evolves and expands, ERO has the ability to quickly customize BI's *Alert Management Plan* to accommodate new technologies, populations, and program modifications. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

population, providing a highly flexible and responsive solution. Our established alert notification procedures meet all requirements outlined in *RFP Section C.6.1.b* and include the following:

- Identify, monitor, and respond to GPS, SmartLINK, and VoiceID alerts 24/7/365.

- Attempt to resolve the alert by contacting participants and designated contacts.

- Assess events to determine if the device appears to be affixed to the participant or to locate units and retrieve equipment for C-sites and G-sites.

- Execute electronic monitoring violation response and notification procedures.

- Document all actions and responses in chronological order in (b)(7)(E) and determining how these events will affect emergency reporting and the *Daily Alert* report.
  (b)(4); (b)(7)(E)
  (b)(4); (b)(7)(E) —**exceeding** *RFP* requirements.

- Apply preapproved consequences for violations, as outlined in the *Program Rules*, with approval from the Task Manager.

- Notify designated personnel in accordance with established contact and escalation lists.
  (b)(4); (b)(7)(E)
  accordance with *RFP Section C.6.13*.

The figure below shows an example of BI Monitoring Operations' approach to managing a GPS *Tamper Alert*, where a participant attempts to remove or interfere with the tracker.

ALERT MANAGEMENT PROCESS

(b)(4); (b)(7)(E)
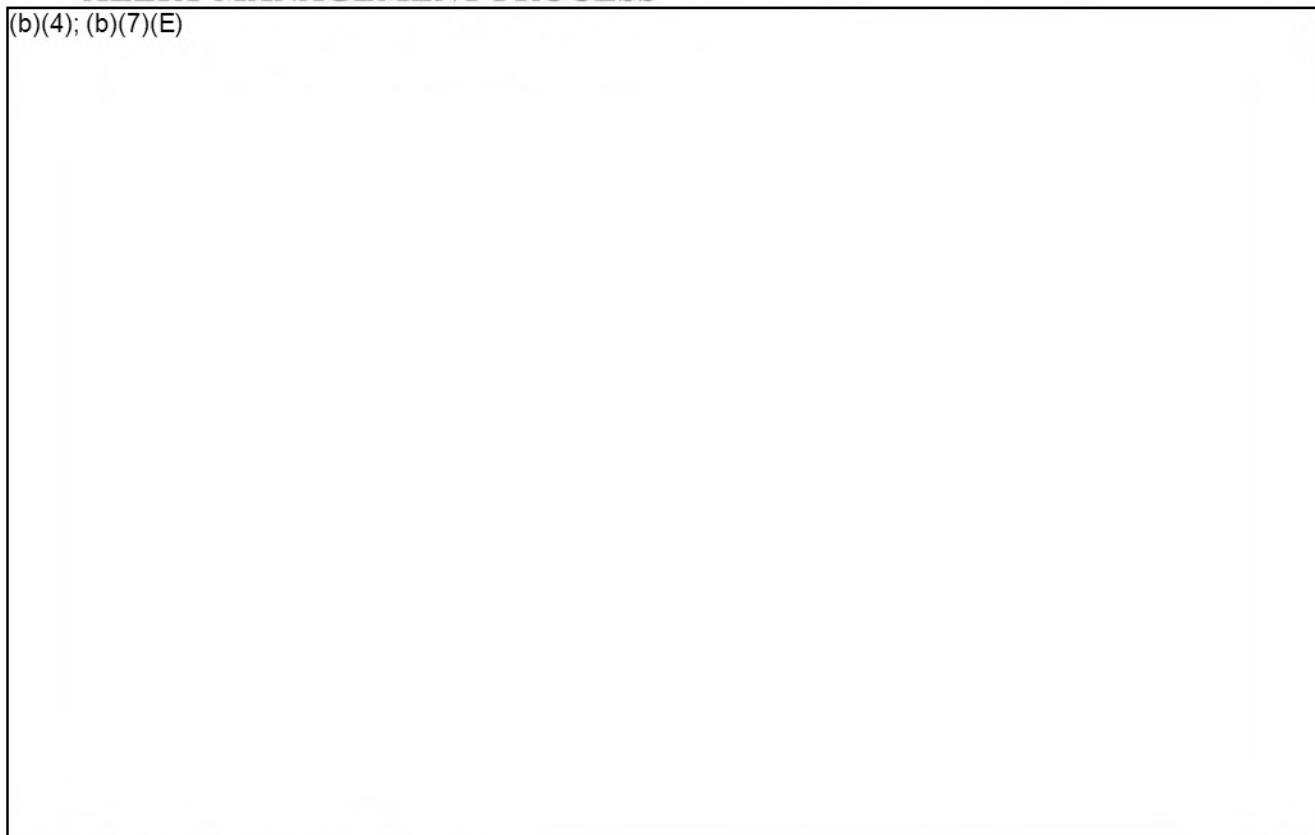
Figure 7. Example of Alert Procedure

Accurate Notifications 24/7/365. BI Monitoring Specialists are 100% cross-trained with ISAP field employees to support consistent alert management. This practice allows BI to support ISAP IV expansion with no service disruptions or delays. BI Monitoring Operations processes alerts afterhours and provides emergency coverage during unforeseen events.

Provide Referrals to Community Resources

Throughout a participant's time in ISAP, Case Specialists continually assess stability and life need issues that present barriers to participant success and compliance. BI has a network of approximately 11,000 community-based providers nationwide. These community contacts cannot be easily duplicated. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

Our experience providing referrals to ISAP participants is summarized in the following figure.

COMMUNITY RESOURCES REFERRALS

BI leverages our strong community connections and existing referral reporting tools to ensure participants use local resources to support compliance with ISAP mandates.

9,551	9,145	3,794	2,953	1,450	715
Food, Shelter, Clothing	Medical, Dental	Other Resources i.e. Transportation, Childcare	Legal	Education Vocational	Mental Health, Substance Abuse, Counseling

27,608 TOTAL REFERRALS DURING ISAP III

Figure 8. Experience with Community Referrals

Successful Community Connection: Santa Ana ISAP Office. A female participant reported that she and her children were unwelcome at their home. The BI Case Specialist referred the participant to the Women's Transitional Living Center. After receiving housing and additional critical resources, the participant stabilized in the community and remained compliant.

④ DOCUMENT AND REPORT ACTIVITIES

Every ISAP IV activity, from enrollment to termination, will continue to be documented within (b)(7)(E) providing a single platform to manage the vast amounts of data generated. Throughout ISAP IV, BI remains committed to notifying designated Government personnel and offices of all critical information. Please see Records Management and Reporting Plan and Communication Plan for additional information.

Technology Plan

1. ADMINISTER AND SUPERVISE ALL ASPECTS OF THE PROGRAM
2. LEVERAGE EXPANDED MANUFACTURING CAPABILITIES
3. PROVIDE SUPERVISION AND CASE MANAGEMENT TECHNOLOGIES
4. DEPLOY SCALABLE MONITORING SYSTEM ARCHITECTURE
5. DEVELOP SOLUTIONS TO MEET CURRENT AND FUTURE NEEDS

Applicable RFP Sections:
Scope of Work: C.6; C.7
Instructions: L.6
Evaluation: M.2
Attachments: 1; 7

ERO requires a suite of technology that guides case management, tracks participant compliance, and monitors locations. The systems must be scalable to meet the growth projected in the *RFP* and provide reports and real-time access to data to ERO and ISAP staff. BI's integrated software solution—in conjunction with highly accurate and reliable supervision technologies—supports ERO's force-multiplier compliance tool objectives. BI describes our technology offerings in this section of our proposal, Appendix C, and Appendix D.

1 ADMINISTER AND SUPERVISE ALL ASPECTS OF THE PROGRAM

All technologies associated with our ISAP IV solution are fully functional and available to ERO from the first day of the contract. Our approach to providing technology to administer and supervise all aspects of the program, and the correlated location of BI's response is summarized by the following table.

Table 12. Administering and Supervising the Program

Program Aspect	Proposal Location		
	Technology Plan	*Attachment 1*	*Other*
Centralized Software Platform			
Case Management	✓		Service Tools
Monitoring System Architecture	✓	✓	Alert Process
Equipment Management		✓	
Remote Access To Database		✓	
Mobile Access To Software	✓	✓	
Reporting		✓	Records
Participant Monitoring Technology			
GPS	✓	✓	
VoiceID	✓	✓	
SmartLINK	✓	✓	
Office Visit Check-In Tablets	✓		Office Visits
Participant ID Cards: *ID scanning and fingerprint*	✓		Service Tools

Table 12. Administering and Supervising the Program			
	Proposal Location		
Program Aspect	*Technology Plan*	*Attachment 1*	*Other*
Technology Infrastructure			
Data Facilities		✓	
Monitoring Facility: *primary and backup*		✓	
Manufacturing	✓		
Telephone Access: *to monitoring center*		✓	
Physical and Data Security		✓	

(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E) This efficient and proven solution is unavailable from other providers.

(b)(4); (b)(7)(E)

Figure 9. Consolidated Software Platform

② LEVERAGE EXPANDED MANUFACTURING CAPABILITIES

To keep pace with the growth of ISAP, BI has expanded the size of our manufacturing facility, increased our capital investment, produced more GPS devices, and improved our personnel processes to respond to ERO's equipment needs. The figure on the following page shows how these improvements have enhanced BI's ability to produce equipment in large quantities.

592,358 GPS UNITS SHIPPED COMPANY-WIDE SINCE 2014

As ISAP IV evolves and expands, BI's unmatched manufacturing capacity will expand in tandem.

				154,697	
56,433	72,180	114,282	106,600		88,166
2014	**2015**	**2016**	**2017**	**2018**	**2019 YTD**
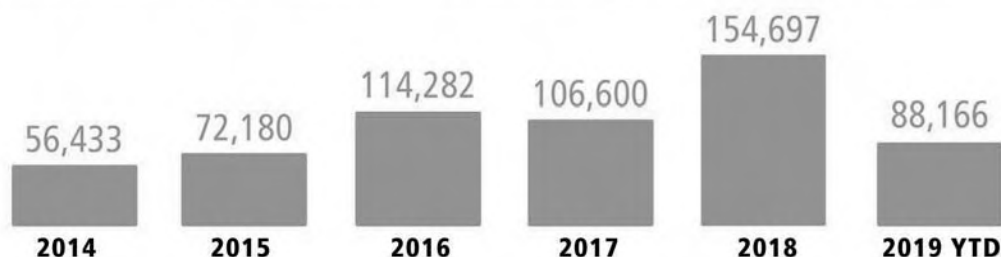
Figure 10. BI Manufacturing Capabilities

Additional manufacturing capability improvements include the following:

(b)(4)

Unmatched Production Capabilities. This year, BI is on record pace to produce more than 170,000 GPS devices, nearly tripling our production in four years while still maintaining an out-of-box failure rate of less than .19%. As the largest manufacturer of electronic monitoring devices in the world, BI is the only vendor able to produce GPS units at the level ISAP requires.

③ PROVIDE SUPERVISION AND CASE MANAGEMENT TECHNOLOGIES

Case Management Tools: Office and Home Visits

Our ISAP IV solution includes technologies, applications, and other resources critical to capturing compliance data and reporting that data to ERO. BI ISAP employees will use the following support tools, systems, and practices to effectively deliver ISAP IV services:

(b)(4); (b)(7)(E)

---

[5] IPC (formerly the *Institute for Printed Circuits*) standards are used by the electronics manufacturing industry. IPC-A-610, Acceptability of Electronic Assemblies, is used worldwide by original equipment manufacturers.

(b)(4); (b)(7)(E)

Program Efficiency Tools

(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

Electronic Monitoring Hardware and Software

Electronic Monitoring Equipment: BI LOC8 and LOC8 XT. Designed by BI engineers with ERO's needs in mind, the LOC8 and LOC8 XT (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

GPS TRACKING AND COMMUNICATIONS
Advanced location monitoring with multiple methods of communication to verify participant location.

(b)(4); (b)(7)(E)

Figure 11. LOC8 Location Detection Capabilities

(b)(4); (b)(7)(E)

The LOC8 and LOC8 XT meet or exceed the requirements outlined in the *RFP*, as demonstrated in Table 13 below.

Table 13. Proposed Electronic Monitoring Equipment		
Requirement	**LOC8**	**LOC8 XT**
Battery Life	(b)(7)(E)	
Size		
Capability		
Programmability		
Upgrade/Refresh		
Maintenance		
Surge Capability		
Range/Radius		

Biometric Reporting System: BI SmartLINK. Installed on a participant's smartphone, SmartLINK
(b)(4); (b)(7)(E)

More than 11,000 Community Service Providers are listed in (b)(4); If a significant event occurs, such as a medical or family situation, the participant can access ISAP-vetted resources without needing to contact ERO or ISAP staff. Alternatively, participants can contact ERO or ISAP staff (b)(4); (b)(7)(E) See Access Data Remotely.
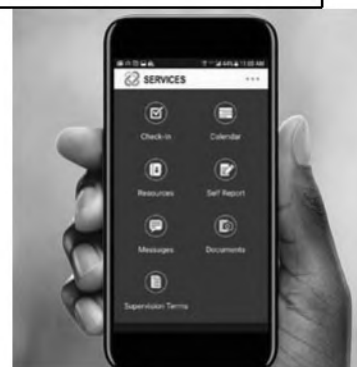
BI's agile approach to development empowers our Software Engineers to upgrade, refresh, and maintain SmartLINK. As ISAP IV operations expand, BI remains committed to implementing innovative SmartLINK features that directly address evolving needs. Since the initial pilot launch in 2015, BI has released nine SmartLINK enhancements.

Multilingual Telephonic Voice Recognition System. BI VoiceID (b)(4); (b)(7)(E)
(b)(4); (b)(7)(E)

VoiceID is a multilingual solution designed to support participant compliance, as shown by the figure on the following page.

SUPPORTED LANGUAGES

With the goal of facilitating participant compliance, BI VoiceID supports 36 languages.

ARABIC | ARMENIAN | BENGALI | CAMBODIAN KHMER | CANJOBAL (Q'ANJOB'AL)
CANTONESE (TRADITIONAL CHINESE) | DUTCH | ENGLISH | FARSI | FRENCH | FUZHOU
GERMAN | GREEK | GUJARATI | HAITIAN (CREOLE) | HINDI | INDONESIAN | ITALIAN
JAPANESE | KICHE | KOREAN | KURDISH | LAO | MAM | MANDARIN (SIMPLIFIED CHINESE)
POLISH | PORTUGUESE | PUNJABI | ROMANIAN | RUSSIAN | SOMALI | SPANISH
SWAHILI | THAI | URDU | VIETNAMESE

Figure 12. VoiceID Multilingual Capabilities

Remotely Accessible Database: TotalAccess Software Platform. TotalAccess (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

Remote Access to Monitoring System: TotalAccess Mobile. TotalAccess Mobile increases the productivity and effectiveness of officers and ISAP staff in the field. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

④ DEPLOY SCALABLE MONITORING SYSTEM ARCHITECTURE

BI invests in heavily redundant monitoring computer systems to support full functionality of our systems. Technological redundancies support hardware and operating architectures across multiple environments. If a component in our data center infrastructure malfunctions, the system engages a redundant component to provide an uninterrupted operating environment.

(b)(4); (b)(7)(E)

⑤ DEVELOP SOLUTIONS TO MEET CURRENT AND FUTURE NEEDS

Throughout ISAP IV, BI looks forward to continuing to provide custom solutions that increase efficiency, streamline communications, and provide critical monitoring data to users in the field.

(b)(4); (b)(7)(E)

Wrist-Worn GPS Technology. BI continues to offer ERO the most advanced technology solutions available in the marketplace. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E) BI is currently testing multiple devices.

Data Integration Approach. (b)(4)

(b)(4) to meet and exceed the original systems integration requirements of ISAP IV. We understand that the agency amended the *RFP* to remove integration requirements. However, (b)(4)

(b)(4)

Transition Plan

① **PREPARE FOR ISAP IV IMPLEMENTATION**

② **LEVERAGE ESTABLISHED INFRASTRUCTURE**

③ **IMPLEMENT ISAP IV SOLUTION**

④ **PROVIDE OPERATIONAL PLANS**

⑤ **ENACT ISAP III TRANSITION-OUT PROCESSES**

STATEMENT OF COMPLIANCE

Applicable RFP Sections:
Scope of Work: C.6; C.7
Security: H.1; H.2; H.3.; H.5
Clauses: HSAR 3052.204-71; I.2
Instructions: L.6
Evaluation: M.2

To implement ISAP IV successfully, the provider must leverage significant resources, knowledge of the immigration system, and the ability to expand operations quickly. ERO relies on a contractor's risk mitigation strategies throughout program transition and implementation to verify that participants are accurately supervised, ERO officers and ISAP staff are trained, and overall program objectives are met.

Three previously successful ISAP implementations and transitions evidence our ability to seamlessly transition ISAP III to ISAP IV. Please also see *Section II—Past Performance.*

① PREPARE FOR ISAP IV IMPLEMENTATION

BI began preparing for transition to the ISAP IV contract two years prior to the *RFP* release. Successful implementation, particularly for a program the size and scope of ISAP IV, requires thorough planning. As detailed in this section, BI developed procedures aimed at eliminating many of the risks associated with ISAP IV contract implementation. We have (b)(4)

(b)(4)

Proven, Custom Software

BI is the only provider that has case management software specifically customized for ISAP operations, significantly reducing the risks associated with development and testing.

Offices). The table on the following page summarizes BI's transition preparation activities.

Table 14. Pre-Award Transition Planning	
Category	**Activity**
Staffing	Recruit all new ISAP IV positions as outlined in ISAP IV Staffing Enhancements. These positions **exceed** *RFP* requirements.
	Make employment offers, contingent upon award, to qualified applicants.
	Submit the qualified candidates for EOD suitability.
	Develop training sessions specific to contract changes and new requirements.
Case Management	Finalize development of (b)(4); (b)(7)(E) (b)(4); (b)(7)(E) **exceeding** *RFP* requirements. See Enhanced Multilingual Software.
	Complete enhanced (b)(4); (b)(7)(E) **exceeding** *RFP* requirements.
Technology	Complete (b)(4); (b)(7)(E) **exceeding** *RFP* requirements.
	Develop, deploy, and continue to upgrade our fully functional TotalAccess Mobile application.
	Continue the process of obtaining FedRAMP ATO, **exceeding** *RFP* requirements. See Authority to Operate.
Records Management	Complete development of 10 new reports and modify existing reports.
	Implement the secure, advanced, paperless record keeping solution in (b)(4); **exceeding** *RFP* requirements.
Communications	Update all participant materials—including the participant handbook, orientation video, and enrollment and intake forms—from ISAP III requirements to ISAP IV requirements.
Quality Control	Finalize *Standard Operating Procedures* with changes from ISAP III to ISAP IV to support accurate quality assurance audits of contract compliance.
Operational Plans	Update ISAP III *Operational Plans* to ISAP IV requirements. See Operational Plans.

BI has refined and implemented several other operational procedures described below.

Manufacturing Capabilities to Support Growth

ISAP III has more than (b)(4) monitored participants and approximately (b)(4) active GPS units. This number of BI-deployed units is more than most other electronic monitoring manufacturers' entire inventory of units. Our manufacturing capabilities, supported by our recently expanded facility, provide BI with production capabilities simply not available from other providers. BI's expanded manufacturing team includes (b)(4)

(b)(4)

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Enhanced Approach to Opening New Offices

Since ISAP inception, the numbers of G-sites, C-sites, Regions, ATD locations, and enrolled participants have increased dramatically. To maintain operational integrity, BI implemented new processes to support opening C-sites within contractually defined timeframes. BI excels at opening offices without service downtime, providing confidence that the program will not experience lapses in supervision when opening new offices or expanding operations.

Opening and Expanding Locations. With approximately (b)(4) employees with suitability determinations, BI is prepared to expand and open offices in a timely compliant manner. To demonstrate these capabilities, consider the following CY2018 metrics:

- 46 offices temporarily detailed staff to help open and expand additional offices.
- (b)(4) ISAP III staff traveled to expedite new or expanded sites.
- On an average weekly basis (b) SAP III staff traveled to help open and expand operations.

Specific preparations, improvements, and processes for opening ISAP IV offices in accordance with contractual timeframes include the following:

- *Offices for ERO Within C-sites.* To provide dedicated offices for ERO at every C-site—a requirement new to ISAP IV—BI will expand our C-site footprint. C-sites without an ERO office will be moved within 90 days of contract award.

- *Proximity to Public Transportation.* To expedite the location of new C-sites, BI will verify that all new sites are within walking distance of public transportation.

- *Internet Connectivity.* Over the last year, BI has upgraded internet capabilities and speed as business needs have increased. We will continue to install high-speed internet circuits in all new C-sites, **exceeding** *RFP* requirements.

- *Faster Site Determinations.* Our Real Estate Manager understands all contractual C-site requirements and works closely with each regional management team to source, negotiate, and finalize leases nationwide. Our national broker network allows us to mobilize and tour prospective sites within 10 business days of a *Contract Modification*.

Expedited Hiring Practices

Pre-Screening Candidate Issues. As an experienced DHS and other federal agency contractor, we understand that U.S. citizenship and having lived in the U.S. for at least three of the last five years are just two of the minimum requirements for DHS suitability. (For a complete list of pre-screening processes and requirements, see Recruit and Hire Staff.) To mitigate unnecessary delays in the hiring and suitability process, we will verify that candidates meet these minimum requirements before moving them through the hiring process.

Hiring with Foresight. During each round of ISAP IV recruitment and hiring, and contingent upon need, BI will recruit (b)(4); (b)(7)(E) Case Specialists at each site, **exceeding** *RFP* requirements. By maintaining a group of candidates who have DHS suitability determination and are available for employment, BI can quickly respond to staffing adjustments.

Obtain Case Management System Authority to Operate

BI is in the process of achieving an ATO for our case management system (b)(4); (b)(7)(E) authorization, **exceeding** requirements. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

② LEVERAGE ESTABLISHED INFRASTRUCTURE

The ISAP IV provider must have experience in manufacturing large quantities of equipment, hiring and training staff, developing and updating *Standard Operating Procedures*, and training ERO personnel—all within short timeframes and on a nationwide basis. As the incumbent contractor, BI has the established infrastructure to seamlessly implement ISAP with minimal disruptions to daily operations—something no other vendor can offer. BI has the resources, capabilities, and infrastructure in place to support ISAP IV, as described below:

- BI has current office locations in all required C-site, G-site, and S-site locations.

- BI has approximately (b)(4) employees with EOD suitability and more than (b)(4) staff 100% dedicated to supporting ISAP IV.

- BI has the organizational structure to support ISAP IV, with dedicated staff in place to assist with human resources, recruiting, finance/accounting, marketing, manufacturing, monitoring operations, technology development, engineering, and fleet management. Our established management structure is staffed with: experts in immigration, case management, and monitoring technologies; and resources from our parent organization, GEO, including numerous experts in immigration and community supervision programs.

- BI is currently providing all technology solutions required for ISAP IV. As a result, officers and participants will experience a seamless transition to ISAP IV. All technology solutions will be available for any newly enrolled participants on day one of the contract.

③ IMPLEMENT ISAP IV SOLUTION

BI's implementation approach provides program infrastructure and coordination with ERO at both a national and a local level to transition participants to ISAP IV without disruption or degradation of performance. Our plan assumes the simultaneous execution of day-to-day operations during transition. Our transition team will be led by (b)(7)(C) Program Director, with support from BI's Transition Team Leads—each with responsibilities and expertise with implementing our solution--and the larger BI and GEO organizations. The graphic on the following page summarizes the key tasks and timeframes associated with implementing BI's ISAP IV solution.

(b)(4); (b)(7)(E)

TRANSITION PLAN

Established infrastructure, risk mitigation approaches, and experience to successfully implement ISAP IV.

ANTICIPATED AWARD: NOVEMBER TRANSITION START: DECEMBER 1	NOV	DEC	JAN	FEB	MAR	APR	MAY

(b)(4); (b)(7)(E)

Figure 13. Transition Timelines

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The following table summarizes key transition activities.

Table 15. Summary of Implementation Activities	
Category	**Activity**
Communications	**Hold a Contract Kickoff:** BI and ATD leadership will hold a contract kickoff to clarify and agree on major transition milestones and timelines. BI will do the following: - Present drafts of all participant materials, incorporate agency feedback, and resubmit materials for final agency approval prior to production and distribution. - Orient ISAP III participants to ISAP IV rules and requirements during regularly scheduled office visits. - Review BI-produced reports with the agency to verify that they meet new ISAP IV reporting requirements. **Interact with Every Level of ERO:** The ISAP Program Director will communicate directly with ERO Headquarters personnel and remain onsite as requested or required throughout the transition period. Regional Managers will report to the Deputy Director and oversee Program Managers onsite at ISAP offices. **Provide Daily Status Updates:** BI Transition Team Leads will hold daily check-in meetings to assess the status of the transition and update the *Transition Checklist*. BI will provide transition update reports at the direction of ERO. **Perform Transition Review:** Two weeks prior to the contract start, BI will schedule a review and coordination meeting with local ERO offices. Regional Operations Managers, Regional Technology Managers, and Program Managers will meet with local ERO offices to review the *Transition Plan* and determine that each component is complete or is on track to satisfactory completion. At the end of the transition period, BI will submit a *Close-Out Report* to ERO describing all transition efforts.
Staffing	**Implement the *Staffing Plan*:** The ISAP Program Director and BI Divisional Director of Human Resources will oversee the implementation of the ISAP IV *Staffing Plan* and new organizational structure detailed in Administrative Structure and Establish Operational Chain of Command. **Finalize Hiring Process:** Hiring new employees is contingent upon EOD suitability. **Perform Other Staffing Tasks:** BI will submit paperwork to move employees with ISAP III EODs to the ISAP IV contract. Where necessary, we will task support employees with EOD to provide transition support to C-site, G-site, S-site, and T-site location transitions.
Training	**Train Officers:** Provide online training to ERO that addresses enhancements made to TotalAccess, VoiceID, LOC8, and SmartLINK. **Provide New Employee Training:** Implement a new employee training curriculum for all new hires (see Training Plan). This training will cover all items listed in the mandatory training, as detailed in *Section C* and *Section H* of the solicitation. **Provide Staff Training:** Train ISAP III staff on new policies, procedures, requirements, and contractual changes.

④ PROVIDE OPERATIONAL PLANS

BI currently has *Operational Plans* in place for each identified area and will provide the COR with updated plans for review and approval upon contract award. Should the COR have any revisions to these *Operational Plans,* BI will make adjustments accordingly and prior to implementation. These plans, as summarized below, comply with all ISAP IV requirements.

Table 16. Operational Plans

Plan	Details	Related RFP Sections
Facilities Plan	Plan office space for our staff, participants, and other stakeholders to support safe, healthy, comfortable conduct of day-to-day business activities at all locations where ISAP services are conducted.	C.6.14.1—Facilities Plan C.7 Item 16—Facilities Plan H.1—Procedure for Opening Additional ISAP IV Locations
Training Plan	Detail how ISAP IV personnel will receive adequate and timely training. See Training Plan.	C.6.3—Contractor Certification and Training Reports C.6.14.2—Training Plan H.2.10—Information Technology Security Training and Oversight H.3.2—Privacy Training, Safeguarding, and Remediation
Transportation Plan	Provide company transportation to ISAP staff in support of safe, timely execution of duties.	C.6.14.3—Transportation Plan
Emergency Readiness and Continuity of Operations Plan	Provide continuity of operations 24/7/365.	C.6.14.4—Emergency Readiness and Continuity of Operations Plan
Security Plan	Detail how all personnel, IT, and physical security requirements will be fulfilled.	C.6.14.5—Security Plan H.2.9—Information Technology H.3.1—Limiting Access to Privacy Act and Other Sensitive Information H.3.2—Privacy Training, Safeguarding, and Remediation I.2, 52.204-21—Basic Safeguarding of Covered Contractor Information Systems I.2, HSAR3052.204-70—Security Requirements For Unclassified Information Technology Resources

⑤ ENACT ISAP III TRANSITION-OUT PROCESSES

If the agency selects a new vendor to provide the services under this contract, BI will work closely with the agency and the new vendor to implement the new vendor's transition plan. BI will be immediately available and prepared to institute this plan. In accordance with *FAR 52.222-17* our activities will include supporting the transition of staff to an alternate vendor.

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The new vendor will need to secure and open facilities, hire and train staff, and manufacture and ship thousands of GPS devices. BI will remain in constant communication with ERO and the new vendor throughout the transition to support a low-risk implementation for the good of public safety.

Orient New Vendor Personnel. Immediately upon award, in coordination with the agency, BI will arrange for the ISAP leadership team to

> **Transition-Out Experience**
>
> *When the agency transitioned from ISAP I to ISAP II, the agency consolidated Enhanced Supervision/Reporting (ESR) and ISAP models. BI worked closely with the ESR vendor to transition the population to ISAP.*
>
> *This valuable experience taught BI the magnitude of transitioning this population to an alternate vendor.*

meet in person with the new vendor. BI will travel to the new vendor's facility, discuss the *Phase-Out Plan,* and introduce key transition personnel and technical staff. BI will also develop a schedule with the new vendor for turning over documents and forms, completing a database transition, and verify that ERO and the vendor can access all historical information.

Create a Formal Phase-Out Team. BI's Phase-Out Team will work with the agency and the new vendor to minimize service disruptions. The team will remain fully staffed throughout the transition process and consist of the following:

- (b)(7)(C) current ISAP III Program Director, will act as the main point of contact for the agency and the new vendor. He will provide an orientation on how overall ISAP systems work, pass on his detailed program knowledge, manage overall coordination activities relating to the transition, and communicate all outstanding issues to the new vendor. He will be supported by BI's internal resources, including the national field services team, to implement the transition seamlessly in coordination with the COR.

- (b)(7)(C) Monitoring Customer Services Manager, has supported ISAP since inception. At the request of ERO, he will educate the new vendor on the agency's alert generation and notification preferences and general monitoring procedures. He will provide the vendor with information on officers, supervisors, and other critical agency personnel on an AOR basis, including all necessary contact information. He will also communicate specific notification and alert procedures for C-, G-, S-, and T-sites.

Minimize Service Disruption and Operational Impact. BI will work with the chosen vendor to develop plans for each ISAP IV location. These plans will provide detailed milestones and deliverables and include the following steps:

1. Provide a transition schedule to the COR. BI will be prepared to begin transition the day the award is announced; however, the new vendor may require additional time to secure office locations, hire and train staff, and manufacture and ship equipment.

2. Work with the agency and the new vendor to coordinate the removal and de-installation of BI equipment at ISAP locations. First, verify that the new vendor's equipment is delivered and ready for installation prior to removing BI equipment from participants. Next, implement the *Phase-Out Plan* in coordination with the COR after the awarded vendor's equipment has been manufactured and shipped to new ISAP locations and after all officers and the vendor's ISAP IV staff are trained.

3. Support the awarded vendor in performing mass-scale intakes.

Provide Phase-Out Reports to the COR and Complete Full Data Transfer. BI will prepare reports for the COR outlining major transition milestones and areas of concern. Reporting will occur on a formal and informal basis, as requested. BI will verify the completion of a full data transfer to ERO, or the new vendor, for all sites at the request of the COR.

Records Management and Reporting Plan

① **CREATE AND MAINTAIN CASE RECORDS**

② **IMPLEMENT ENHANCED PAPERLESS SYSTEM**

③ **PROTECT RECORDS AND SECURE DATA**

④ **PROVIDE TIMELY, ACCURATE REPORTS**

⑤ **ACCESS DATA REMOTELY**

Applicable RFP Sections:
Scope of Work: C.6; C.7
Document Packaging: D
Security: H.2; H.3
Instructions: L.6
Evaluation: M.2
Attachments: 8

ERO requires custom, on-demand reports that accurately reflect changing objectives and demands and evolving immigration policies. Drawing upon a combination of our advanced software and highly trained staff, BI's *Records Management and Reporting Plan* provides timely, accurate, and actionable data to ERO.

Advanced, Single-Platform. The foundation of BI's *Records Management and Reporting Plan* is (b)(4); (b)(7)(E)

From providing a complete picture of participant activity in a single record to detailing nationwide program performance metrics, (b)(4); (b)(7)(E)
(b)(4); (b)(7)(E)

reports detailed in *RFP Attachment 8* and provides timely accurate reports and maintains records in accordance with DHS/ICE policies.

① **CREATE AND MAINTAIN CASE RECORDS**

Consolidated, accurate, and easy-to-navigate data will support successful ISAP IV supervision activities and outcome monitoring. BI will develop an initial (b)(4); (b)(7)(E) during enrollment and then continually update each participant's (b)(4); (b)(7)(E) as the individual progresses through the program. (b)(4); (b)(7)(E)
(b)(4); (b)(7)(E) streamlining operations and significantly **exceeding** *RFP* requirements. (b)(4); (b)(7)(E)
The following table summarizes the types of information each participant (b)(4); contains.

Table 17. Case Records	
Type	**Information**
(b)(4); (b)(7)(E)	

Table 17. Case Records

Type	Information
(b)(4); (b)(7)(E)	

② IMPLEMENT ENHANCED PAPERLESS RECORD SYSTEM

New to ISAP IV, BI's solution includes an enhanced approach to maintaining all documents electronically, (b)(4); (b)(7)(E) (b)(4); (b)(7)(E) **exceeding** RFP requirements. The consolidation of this virtual data—from participant acknowledgement forms, to copies of travel documents, to evidence of referral utilization—streamlines communications eliminates duplicate data entry. Our virtual records solution also includes:

(b)(4); (b)(7)(E)

③ PROTECT RECORDS AND SECURE DATA

A key part of BI's *Record Management and Reporting Plan* focuses on maintaining the confidentiality of proprietary information, including Personally Identifiable Information (PII). We secure participant information through staff training, stringent virtual and physical security practices, and elimination of paper records through an innovative scanning solution. BI certifies that our methods to protect PII comply with all *RFP* requirements, as detailed below.

Table 18. Protecting PII

Activity	Relevant RFP Requirements
Protecting PII in Invoices	RFP Section G.4—**Invoice Requirements**

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Table 18. Protecting PII	
Activity	**Relevant RFP Requirements**
Terminating Access to PII	RFP Section H.3.1—**Separation Checklist for Contractor Employees**
Communicating DHS PII Security Requirements *Written materials and training*	RFP Section G.4 and H.5—**Handbook for Safeguarding Sensitive PII** RFP Section H.3.2—**Privacy Training, Safeguarding, and Remediation** RFP Section H.3.3—**Government Records Training, Ownership, and Management** RFP Section H.4—**Information Technology Security and Privacy Training**

Maintain and Safeguard Records. BI will protect participant information electronically and by training our personnel on appropriate disclosure policies. Only authorized individuals will have access to participant and program information. In addition, BI will segregate materials to control Government personnel access, in accordance with ERO requirements.

System of Accountability. Authorized agency personnel and ISAP IV staff will have access to all participant and program information through the highly secure (b)(4); (b)(7)(E)   In support of (b)(4); (b)(7)(E)

Physical Records. By offering a fully electronic solution, BI anticipates the only physical records retained during ISAP IV will be participant Travel Documents. Authorized personnel and ISAP IV staff will keep hardcopy records (b)(4); (b)(7)(E)   until handoff to ERO.

Redundant Data Systems

(b)(4); (b)(7)(E)

Data Storage and Recovery. BI will maintain all participant, equipment, and monitoring information permanently (b)(4); (b)(7)(E) BI will maintain historical data on backup tapes. Authorized personnel can view all program information, including notifications and events, any time from any web-enabled device (b)(4); (b)(7)(E) or by calling BI Monitoring Operations. BI's data retention systems, policies, and procedures meet or exceed *RFP* standards. BI performs incremental, automated backups (b)(4); (b)(7)(E)

④ **PROVIDE TIMELY, ACCURATE REPORTS**

To measure participant compliance and monitoring programs, ERO personnel need to access data and generate reports in the office and in the field. Reports must properly capture and consolidate crucial information to identify program trends, monitor equipment usage, track participant behaviors, and measure the overall performance of ISAP IV. Authorized users, including officers and BI staff, can run reports (b)(4); (b)(7)(E) (b)(4); (b)(7)(E)   Authorized agency personnel will be able to access participant and program information at any time, including violation reports (failed office visits, failed home visits, and electronic monitoring violations), enrollment and termination numbers, and other participant statistics.

Document and Report Unforeseen Events

Upon learning of any change in participant status or condition, BI will immediately notify ERO, the COR, and other agency personnel as required, as well as follow up in writing within 24 hours with an *Emergency Report*. In compliance with *RFP Section C.6.10.3*, BI (b)(4); (b)(7)(E) to generate *Emergency Reports* within 24 hours in the circumstances described in the table below.

(b)(4); (b)(7)(E)

Table 19. Types of Emergency Reports

Type	Event	(b)(4); (b)(7)(E)
Equipment Violation	Evidence of tampering with a device Strap tampers that are not resolved within 24 hours Unauthorized travel when the participant cannot be contacted	
Service Violation	Unauthorized absence, failed office visit, failed home visit, or residence verification that remains unresolved for more than two business days	
Physical/Mental Health	Hospitalization or serious medical condition, death, suicide attempt	
Criminal Activity	Suspected abuse or neglect of the participant and/or the participant's immediate family members Suspected violation of a restraining order, police contact Contacts or threats by individuals believed to represent alien smuggling syndicates or organized crime	
Other	Inappropriate conduct or behavior between contract staff and participant Media interest	

As a single-source solution, BI will continue to customize *Emergency Reports* to support evolving enforcement objectives. This customization capability is crucial to the future of ISAP. *Emergency Reports* will include all information required in the *RFP Scope of Work*.

Enact Reporting Standard Operating Procedures

BI will continue to follow our established *Standard Operating Procedures* for all records and reporting requirements. These procedures—developed, implemented, and refined over 15 years of ISAP operations—will be updated to meet all ISAP IV requirements. BI will continue to collaborate with ERO to define the reporting parameters that are most valuable to ISAP IV operations. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

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BI is the only provider that can deliver a fully functioning and integrated records management and reporting system on the first day of the new contract. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

Table 20. ISAP IV Reports

| | | (b)(4); (b)(7)(E) | |
RFP Reference	**Report**	*Existing*	*New*
SOW, Attach. 8	**Custom Reports on Demand:** Ad Hoc	✔	
SOW, Attach. 8	**Legal Stage Report**	✔	
SOW, Attach. 8	**Notification of Change of Address Report**	✔	
SOW, Attach. 8	**Travel Document Report:** Monthly	✔	
SOW, Attach. 8	**Absconder Model Report**	✔	
SOW, Attach. 8	**Participant Count by Billing Service:** Monthly	✔	
SOW, Attach. 8	**Weekly Program Reports**	✔	
SOW, Attach. 8	**Compliance Report:** Monthly	✔	
SOW, Attach. 8	**Quarterly Program Report**	✔	
SOW, Attach. 8	**Daily Count by Office**	✔	
Attach. 8	**Participant Report**	✔	
Attach. 8	**Termination Report by Term Code**	✔	
Attach. 8	**Compliance Report**	✔	
Attach. 8	**Exception and Alert Reports**	✔	
Attach. 2	**ECMS Monthly Report**		✔
Attach. 2	**ECMS Participants and Dependents Report**	✔	
Attach. 2	**ECMS Linked Clients Report**	✔	
SOW, Attach. 8	**Summary of Emergency Reports Issued:** Weekly	✔	
SOW, Attach. 8	**GPS Frequency Report**		✔
SOW, Attach. 8	**Missed Service Report:** Monthly		✔
SOW, Attach. 8	**Intelligence Report**		✔
SOW, Attach. 8	**End-of-Day Summary:** Daily		✔
SOW, Attach. 8	**Stint Report**		✔
SOW, Attach. 8	**Monthly Program Progress Report**		✔

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Table 20. ISAP IV Reports

RFP Reference	Report	(b)(4); (b)(7)(E)	
		Existing	*New*
Attach. 8	**Generated Missing Data Reports**		✓
Attach. 8	**No Technology Report**		✓
SOW, Attach. 8	**Annual Report**	Generated Manually	
H: Security	**Termination and Resignation Report:** Within 5 Days of Occurrence	Generated Manually	
SOW	**Training Reports:** Monthly, Includes Certifications	Generated Manually	
EXCEEDS	**Summary of Change of Address:** Monthly	✓	
EXCEEDS	**Summary of Confirmed Pregnancies:** Monthly	✓	
EXCEEDS	**Nationality Report:** Monthly	✓	
EXCEEDS	**Turnover Summary:** Monthly	✓	
EXCEEDS	**ATD Participants Report:** Daily	✓	
EXCEEDS	**SBEI Participant Tracking:** Weekly and Monthly	✓	
EXCEEDS	**SBEI Master Exclusion Report:** Monthly	✓	
EXCEEDS	**ERO Court Appearance Request:** Monthly	✓	

In addition, BI confirms our compliance with *RFP Section D* report packaging requirements.

Custom, On-Demand Reporting Capabilities.
As ISAP continues to evolve to meet ERO needs, BI remains committed to providing custom reports in tandem. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

> **Established Reporting Templates**
>
> *Over the past 15 years, BI has developed 120 custom reports to provide accurate, timely information to the Government.*

(b)(4); (b)(7)(E)

appropriate. In support of ISAP III, BI currently provides ad-hoc reports to ERO Headquarters on a daily, weekly, and monthly basis.

Leverage Knowledge of Computer Programs and Statistical Data

BI has the established technology and tenured personnel necessary to provide timely data and statistical reporting. Our reporting source, (b)(4); (b)(7)(E) was designed and developed in house.

(b)(4); (b)(7)(E)

Data Integrity Practices

BI has a multifaceted approach to maintaining data accuracy. Trained staff, (b)(4); (b)(7)(E) (b)(4); (b)(7)(E) are essential to supplying ERO with accurate data. On a weekly basis, we generate *Exception Audit Reports* that identify incomplete or inaccurate data for both internal and Government employees.

⑤ **ACCESS DATA REMOTELY**

To support remote access to data, BI's ISAP IV solution includes our fully functional, feature-rich smartphone and tablet application (see <u>TotalAccess Mobile</u>). Key TotalAccess Mobile features (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

Communications Plan

① **MANAGE COMMUNICATIONS WITH THE GOVERNMENT**
② **SUPPORT PARTICIPANT COMMUNICATIONS**
③ **CONNECT WITH COMMUNITY PROVIDERS AND MANAGE MEDIA**
④ **MAINTAIN CONTINGENCY PLANS**

Applicable RFP Sections:
Scope of Work: C.6
Instructions: L.6
Evaluation: M.2

ISAP operates 24/7/365, and the agency requires a reliable contractor that will communicate with the agency, NGOs, and participants 24/7/365. BI's goal is to reduce ERO exposure to negative community and media response by proactively monitoring and reporting participant violations and significant events to ERO. GEO Care's Vice President of Strategic Marketing, (b)(7)(C) (b)(7)(will carefully track all ISAP IV media activity. BI's approach to managing ISAP IV communications is summarized below.

COMMUNICATIONS PROCESS
Every level of BI's ISAP operations remains dedicated to informing ERO and participants of critical ISAP IV information.
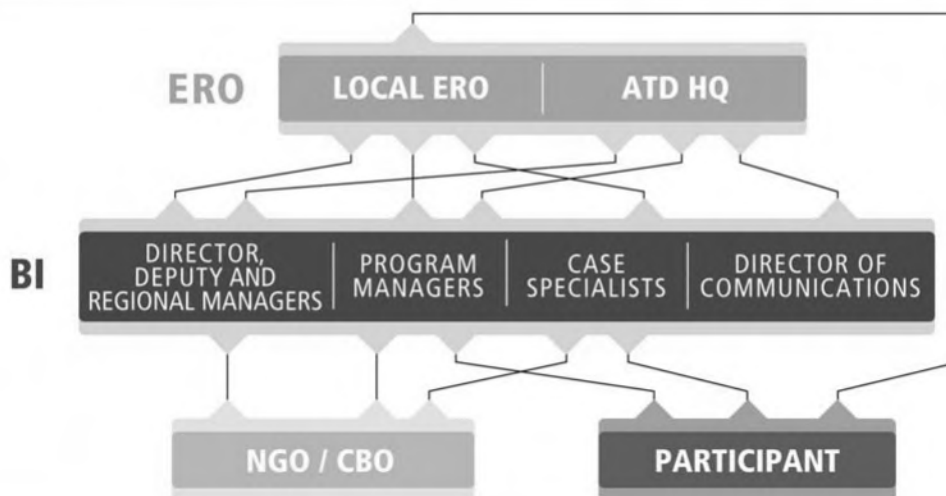

Figure 14. Communication with Key Stakeholders

① MANAGE COMMUNICATIONS WITH THE GOVERNMENT

Company Infrastructure Supports 24/7/365 Operations. Our operational chain of command (see Establish Operational Chain of Command) involves the right personnel at the right time. This streamlined flow of communication provides alert investigation, *Serious Incident Reports*, and *Emergency Reports* to the appropriate level of ERO. The following table summarizes the individuals available to ERO 24/7/365 and **exceeds** requirements.

Table 21. 24-Hour Availability

Title(s)	24-Hour Availability			Communication Level
	Phone	*Email*	*Text*	
BI Executive Vice President **Executive Vice President of Immigration Services**	✓	✓	✓	**ERO Headquarters** *All Urgent Matters*
Program Director **Deputy Director**	✓	✓	✓	**ERO Headquarters** *All Urgent Matters*
Regional Managers **Program Managers** **Deputy Program Managers**	✓	✓	✓	**ERO Headquarters, Local ERO Offices** *ERO Contact, Participant Emergencies*
Monitoring Specialists	✓	✓		**ERO Officers** *Alert Management, Court Tracking, Enrollment, Troubleshooting, Technical Support*

Beyond the individuals identified in the table above, many other highly qualified individuals and BI/GEO leadership are available 24/7/365 to ERO (see SME Experience and Qualifications). During our 15 years operating ISAP, local ERO and DHS Headquarters staff have developed professional relationships with BI and GEO employees—often contacting our staff outside of normal business hours. BI will continue to support this level of communication throughout ISAP IV. In addition, in the unlikely event that there are system issues, which inhibit full performance of the contract, BI will notify the ATD, COR, and the corresponding Section Chief and AMO within 24 hours. BI will perform follow-up actions in accordance with our *Quality Control Plan* and *RFP SOW Tasks and Deliverables* requirements. Also see 24/7/365 Operational Availability.

Notification Chain for Electronic Monitoring Violations. BI maintains *Standard Operating Procedures* for electronic monitoring violations, alerts, and notifications. These procedures are housed (b)(4); (b)(7)(E)
(b)(4); (b)(7)(E) and directs personnel through managing alerts generated by EM equipment. (b)(4); (b)(7)(E)
(b)(4); (b)(7)(E)

> **Established Notification Chain**
>
> *BI's Alert Management Guide contains specific procedures and notification chains for each type of technology. ERO and BI staff periodically meet to review the procedures for adjustments to desired notification levels.*

Contract Management Communications. BI's ISAP leadership team meets with ERO on a monthly and annual basis to review and assess BI's performance, verify that performance audits align with ERO's goals, and resolve any program issues. BI is able to quickly identify and respond to SOW changes and pivot our operations accordingly.

Reporting and Processing Grievances. If a participant grievance arises, BI will document information in the *Case Record* and communicate with the agency, in compliance with *RFP Section C.5.d.*

Non-Emergency Report Notifications. BI will immediately notify ERO by email and *End-of-Day Reports* when participants are involved in situations that do not rise to the level of an emergency report, such as confirmed pregnancy, childbirth, medical incident, unauthorized travel (participant contacted), or other circumstances dictated by ERO. The notification will include all data elements listed in *RFP Section C.6.10* (also see <u>Process Alerts and Notify ERO</u>).

Successful Communication with ERO: El Paso Office. A BI Case Specialist noticed a participant acting erratically during an office visit. Concerned for the participant's children, who were present, the Case Specialist contacted ERO and Child Protective Services (CPS). ERO officers and BI staff waited with the participant for CPS to arrive. After discovering evidence of drug use and unsuitable living conditions, CPS placed the children in foster care. BI's swift communication supported ERO's priorities to remove children from dangerous conditions.

Significant Incident Notification Plan. Significant ISAP incidents can include participant issues, high-profile incidents, personnel issues, negative community reaction, natural disasters, and any other events that could have a detrimental impact on the agency or program. Upon learning of such incidents, BI will immediately inform appropriate ERO Headquarters personnel and generate an *Emergency Report* (see <u>Document and Report Unforeseen Events</u>). If a high-profile incident occurs, BI will immediately notify the appropriate agency personnel.

② SUPPORT PARTICIPANT COMMUNICATIONS

Clear communication with participants is critical to successful operations, and BI has several strategies to support participants' understanding of program expectations—including providing ATD-approved materials. BI's methods to communicate with participants is summarized below.

Table 22. Participant Communication Methods

Category	Method, Tool, or Approach	Exceeds
Supporting Participant Stabilization	Coordinate with NGOs and local attorneys to provide Know Your Rights and Cultural Orientation presentations onsite at ISAP offices.	
	Maintain a community resource area in each ISAP office.	✓
	Establish *Community Connections* database in (b)(4); (b)(7)(E) to document and update resources available to participants.	✓
Increasing Compliance with Supervision Terms	Support 36 languages in BI VoiceID.	✓
	Develop SmartLINK to support Spanish-speaking participants.	

Table 22. Participant Communication Methods

Category	Method, Tool, or Approach	Exceeds
Explaining Program Rules	Recruit and hire bilingual staff—96% of ISAP III staff who interact directly with participants are bilingual.	
	Provide ATD-approved participant materials in more than 20 languages *for example pro-bono legal service lists, bus schedules*	✓
	Using language lines and automated translation services.	
	Implement multilingual case management features in (b)(4); (b)(7)(E) supporting 21 languages.	✓

③ CONNECT WITH COMMUNITY PROVIDERS AND MANAGE MEDIA

BI ISAP Program Managers will continue to perform community outreach, build networks of NGO and Community-based Organization (CBO) resources, and maintain positive relationships within the community. These community connections, with support from our Media Relations Team, are critical to managing negative media attention. BI will continue to notify DHS and our internal ISAP leadership team of media coverage and inquiries. BI will not respond to any direct requests from the media, referring all inquiries to the ICE Office of Public Affairs.

Legal Interactions and Confidentiality. BI staff will not discuss participant case information with anyone other than ERO and the participant. As directed by ERO, we will continue to allow legal counsel only in office waiting areas; we will never discuss case information with a participant's attorney. Similarly, BI will never provide legal advice or interfere with proceedings or execution of Final Orders of Removal. Any legal questions or concerns will be referred to ERO.

Successful Legal Interaction: Sacramento ISAP Office. A participant's attorney directed her not to attend court, and the attorney was also not present at the hearing. The BI Case Specialist gathered information, conducted research, and determined the attorney was fraudulent. After alerting ERO, BI provided the participant with information on how to report the attorney to the American Bar Association and law enforcement, and the participant hired a new attorney.

Community Outreach Approach. Throughout ISAP I, II, and III, BI has built strong national and local relationships to support participant compliance. Positive community connections mitigate negative media pressure and demonstrate BI's commitment to educating and supporting participants. Key components of BI's approach to community outreach include the following:

- Expanding our partnerships with NGOs by identifying community providers that can provide services within the respective AOR; currently we have 111 Memorandums of Understanding (MOU) with local service providers

- Reviewing MOUs annually; confirming MOUs are never in marketing materials

- Establishing a *Community Reference Committee* to review NGO service provision, identify services gaps, and report findings to ERO

- Holding educational briefings at ISAP offices, ERO Field Offices, local NGO locations, and national NGOs in Washington, DC

- Conducting Day of Service events, where local BI ISAP staff, often with ERO personnel, provide direct support to people in the community and help NGOs with service projects.

Notification Procedures on Dealing with Media Inquiries. Our *Community Outreach Plan* will manage community response and result in less media interest. In the 15 years BI has supported ISAP, we have never discussed operations with the press. We train our staff to refer all inquiries through GEO's Media Relations Team and remind employees of media policies quarterly. BI's established *Standard Operating Procedure* for managing media inquiries is as follows:

1. Upon receipt of a media inquiry, ISAP Program Managers document the inquiry and notify the Regional Manager, who escalates to the Deputy Program Director.

2. The Deputy Program Director verbally notifies ERO Headquarters and the ISAP Program Director immediately and follows up with a formal written report.

3. BI notifies GEO Care's Vice President of Strategic Marketing, (b)(7)(C) who has supported ISAP media management since program inception. She will report the event to the ICE Office of Public Affairs (OPA), other ICE and ERO stakeholders (as defined by ICE), and BI's executive leadership team.

4. The GEO Care Media Relations Team proactively tracks and reports media activity.

④ MAINTAIN CONTINGENCY PLANS

Contingency Plan for Participant Communications. Each participant's ISAP ID card will include a site-specific emergency number. Participants will be able to leave a recorded message, and the service will immediately alert the assigned Program Manager. The Program Manager will return participant calls and address emergencies or arrange for follow-up during business hours. BI staff and systems will enable us to contact large numbers of participants in case of emergencies.

Contingency Plan for Negative Community Reaction. We will continue to mitigate the risk of negative community response by drawing upon our strong relationships and partnerships with NGOs and CBOs. In the event of negative community or media reaction to ISAP, BI will execute the following protocols upon receiving agency approval:

- Enact the *Media Inquiry Standard Operating Procedure.*

- Provide ISAP IV community education support to local and national offices.

- Hold meetings with ERO (local and/or Headquarters) to develop mitigation strategies.

- Support ERO in conducting meetings to educate the community.

- Provide ERO with materials, statistical data, and support for all resolution activities.

The ISAP Program Director, Deputy Program Director, and Regional Managers are trained to gather feedback and communicate approved talking points, as required. Local ISAP Program Managers will be authorized to proactively communicate with and describe ISAP services to prospective CBOs/NGOs, businesses, and property owners in proximity to ISAP facilities. BI will continue to comply with all legal requirements under ISAP IV and will alert ERO of any Freedom of Information Act (FOIA) requests we receive.

ISAP IV DEPARTMENT OF HOMELAND SECURITY
Intensive Supervision Appearance Program
Solicitation Number: 70CDCR19R00000002 | July 1, 2019

Section 1 | **TECHNICAL**

Contract Management and Operations Plan

① **ESTABLISH CONTRACT MANAGEMENT OBJECTIVES**

② **MANAGE AND DELIVER TO CONTRACT REQUIREMENTS**

Applicable RFP Sections:
Scope of Work: C.6
Instructions: L.6
Evaluation: M.2

Effectively managing the ISAP IV contract is essential to consistent delivery, accurate data, and timely transparent reporting. Our *Contract Management and Operations Plan* details BI's approach to managing and delivering contract requirements. The ISAP IV Program Director, (b)(4) (b)(4); will oversee and manage all contract requirements and key objectives of BI's approach.

① **ESTABLISH CONTRACT MANAGEMENT OBJECTIVES**

BI's *Contract Management and Operations Plan* includes the following objectives:

- Deliver participant compliance with release conditions, court appearances, and Final Orders of Removal.

- Communicate any issues that arise in the program to ERO immediately.

- Consistently deliver quality services in all locations nationwide.

- Rapidly execute authorized changes consistently in all field locations.

- Collaborate with ERO at the field, region, and HQ level.

- Offer innovative solutions to meet ERO Mission requirements and improve outcomes.

- Manage data, maintain records, monitor and measure critical areas, and reporting results.

② **MANAGE AND DELIVER TO CONTRACT REQUIREMENTS**

The following table summarizes our approaches to managing the ISAP IV contract.

Table 23. Approach to Contract Management and Delivery

Approach Elements *(linked to applicable proposal section)*	Key Deliverables
Operational Chain of Command *Align with ERO regions*	Provide 24/7/365 access to management and staff to respond to ERO immediately.
	Provide timely and consistent delivery of information, policies and programmatic details.
Administrative Chain of Command **Subject Matter Expert Network** **Adequately Staff** *Support of contract requirements*	Provide staff, equipment, and software to meet operational needs.
	Provide the ability to meet growth demands, including new offices, equipment, software scalability, ad-hoc reporting, program innovation, and backup for special operations.
	Identify system-wide operational improvements and develop new innovative solutions, **exceeding** RFP requirements.

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Table 23. Approach to Contract Management and Delivery

Approach Elements *(linked to applicable proposal section)*	Key Deliverables
Training of ISAP *Carry out contract policies and procedures and effectively use software and hardware tools proposed in our solution*	Provide initial and ongoing training to prepare employees to deliver services with competence and consistency nationwide, **exceeding** RFP requirements.
	Provide training that supports staff understanding of data integrity, which is critical to accurate reporting and analytics.
Quality Assurance **Data Integrity** *Focus on continuous improvement*	Verify contractual compliance and improve program performance.
	Communicate transparent audit findings to the agency.
Summary Reporting of Program Details **Contract Management Communications** **Analytic Reporting of Results** *Provide timely and accurate reporting of outcomes*	Eliminate issues created by disparate systems with a single platform that maximizes efficiency and facilitates accurate, timely reporting.
	Hold monthly in-person meetings at HQ with the ISAP Program Director, the COR, ACORs and Cap Gemini staff.
	Identify trends, issues, and successes quickly, using AOR dashboards and monthly summary reports—**exceeds** requirements.
	Deliver timely reports required in *RFP Attachment 8*—**exceeds** RFP requirements. Our data analysis team quickly generates ad-hoc reports that help measure specific program objectives.

Quality Control Plan

① USE ESTABLISHED PROCESSES AND DATABASES

② UPGRADE AND IMPROVE TECHNOLOGIES

Applicable RFP Sections:
Scope of Work: C.6; C.7
Contract Administration: G.4
Security: H.3
Instructions: L.6
Evaluation: M.2
Attachments: 9

ISAP requires a quality assurance approach based on continual performance review, ongoing communications with ERO, and transparent audit findings. BI has the resources, leadership experience, ISAP-specific experience, and autonomy to verify, adapt, and improve ISAP operations nationwide through our innovative approach to quality management. BI and GEO maintain a reputation for hiring quality control personnel with exceptional field experience.

Our Contract Compliance Department has firsthand knowledge of internal DHS quality control expectations, audit processes, and reporting procedures.

① USE ESTABLISHED PROCESSES AND DATABASES

For all areas of ISAP contract fulfillment, BI will continue to define, implement, review, and update quality control and internal audit procedures annually, at minimum. BI will execute and document the results of audits and establish that all documentation (e.g., internal audit reports) related to the *Quality Control Plan* are available to the COR and CO at any time. BI will conduct comprehensive reviews of ERO audits to correct errors and identify areas for improvement.

Internal Audit and Review Process. BI has access to leadership experience and the resources necessary to manage a nationwide *Quality Control Plan.* GEO operates a stand-alone Contract Compliance Division, which supports BI's ISAP approach. This division does not report into BI or ISAP, providing autonomous, unbiased, and consistent compliance measures. This division has (b)(4) auditors dedicated only to ISAP compliance verification.

Our *Quality Control Plan* includes two types of audits: corporate audits conducted by GEO's autonomous contract compliance division; and local audits performed by BI staff at each office. Audits result in *Corrective Action Plans* to address any potential areas of improvement. As a result of this robust compliance program, BI gains insight and applies best practices to our continuum of electronic monitoring technologies and case management services. Our audit and *Corrective Action Plan* processes are summarized by the following figure.

ANNUAL CONTRACT COMPLIANCE AUDIT PROCESS

BI has the resources, leadership experience, and autonomy to verify, adapt, and improve ISAP operations on a nationwide basis through our innovative approach to quality management.
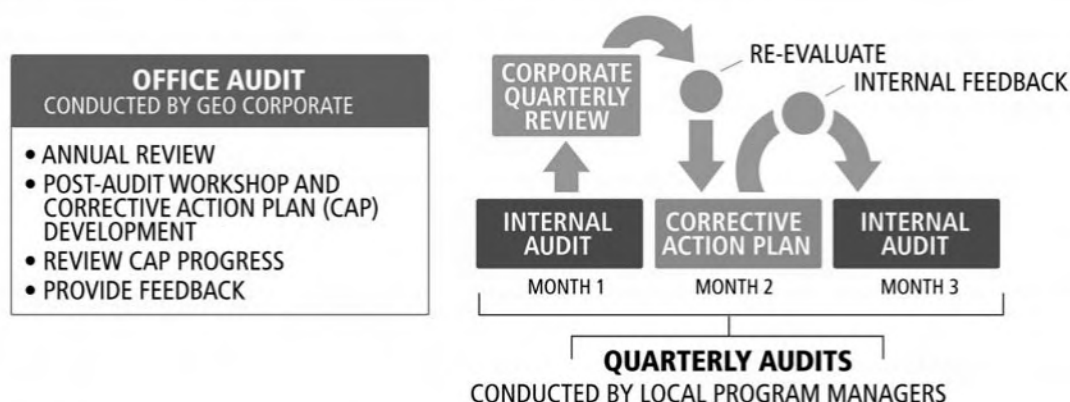
OFFICE AUDIT
CONDUCTED BY GEO CORPORATE

- ANNUAL REVIEW
- POST-AUDIT WORKSHOP AND CORRECTIVE ACTION PLAN (CAP) DEVELOPMENT
- REVIEW CAP PROGRESS
- PROVIDE FEEDBACK

CORPORATE QUARTERLY REVIEW

RE-EVALUATE
INTERNAL FEEDBACK

INTERNAL AUDIT — MONTH 1
CORRECTIVE ACTION PLAN — MONTH 2
INTERNAL AUDIT — MONTH 3

QUARTERLY AUDITS
CONDUCTED BY LOCAL PROGRAM MANAGERS

Figure 15. Internal and External Audit Process

We use the results of our audit data in multiple ways. BI recognizes ISAP offices that consistently produce excellent compliance results at annual, internal conferences. BI also uses audit results as a component of Program Manager and Regional Manager performance evaluations. Lastly, GEO's Contract Compliance Division and ISAP Training Department develops new training curricula or performs refresher trainings based on trends in audit results.

External Reporting Process. The GEO Contract Compliance Team completes an annual audit of each ISAP office and invites local ERO to attend the review. At the yearly ATD/BI Contract Performance Conference, we provide a summary of results to the program office and COR. BI will provide audit results to the COR at any time upon request.

Primary and Backup Monitoring Facility Quality Assurance. Monitoring Operations tracks quality statistics such as answer speed, hold time, and abandoned call rate to monitor performance. Management regularly analyzes randomly selected calls to verify that Monitoring Specialists follow proper security procedures, answer and/or forward customer inquiries as appropriate, effectively resolve customer issues, and to help identify any additional staff training needs. This analysis occurs at both our primary (b)(7)(E) and backup (b)(7)(E) (b)(7)(E) facilities.

As part of BI's established *Quality Control Plan*, Monitoring Operations records all incoming and outgoing calls to consistently monitor specified call center metrics and verify compliance with established quality objectives.

Corrective Action Plan. Corrective actions will occur in all audited processes and during each review when auditors identify a deficiency. The ISAP senior management team will follow up with the Contract Compliance Team and Program Managers until all corrective actions are fully implemented and sustained compliance is achieved. Corrective actions will be continually tracked as part of BI's management metrics.

Billing Processes. The ISAP IV Program Director and BI's Vice President of Financial Planning will check billing processes monthly to identify any discrepancies. We investigate discrepancies to determine the specific billing issue and verify the correction, as described in the figure below.

HIGHLY ACCURATE BILLING PROCESS

BI's established invoicing procedures are a critical component of our quality control plan.

BI LOCAL
- Reconcile accounts and technology weekly to ensure accuracy
- Complete reconciliation monthly

BI NATIONAL
- Reviews data integrity reports for accuracy
- Research anomolies, run national PCBS* report, reconcile to invoice
- Distribute individual PCBS to each ICE POC in the field

ERO LOCAL   ERO HQ
- Verify accuracy and sign off on the reports
- Verify assigned PCBS for each location on invoice
- Authorize BI to submit monthly invoice

*PCBS = PARTICIPANT COUNT BY BILLING SERVICE

BI resolves the issue and distributes an individual PCBS report.

179 PCBS REPORTS SENT PER MONTH IN CY4

0.02% ADJUSTMENTS MADE COMPARED TO AMOUNT INVOICED IN CY4

Figure 16. Quality Assurance Billing

② UPGRADE AND IMPROVE TECHNOLOGIES

Key improvements to our offerings in ISAP IV include the following:

- Run primary Monitoring Operations out of our (b)(7)(E) facility—backed up by our (b)(7)(E) location—which can support expansion (b)(4)
- (b)(4)
-
- (b)(4) Contract Compliance employee for every (b)(4) offices opened and (b)(4) Recruitment Specialist every time the program grows by (b)(4) employees.
- (b)(4); (b)(7)(E)

Appendices

Documentation supporting BI's *Section 1—Technical Proposal* includes the following:

- Appendix A—Resumes
- Appendix B—Response to RFP Attachment 2: ECMS
- Appendix C—Technology Executive Summary
- Appendix D—Response to RFP Attachment 1: Detailed Technology Specifications
- Appendix E—FCC Certifications
- Appendix F—Facilities Executive Summary

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Appendix A—Resumes

Immediately following this page, please find *Resumes* and *Statements of Commitment* from BI's ISAP IV Management Team, including:

- (b)(7)(C) Program Director
- (b)(7)(C) Deputy Program Director
- (b)(7)(C) Northwest Regional Operations Manager
- (b)(7)(C) Southwest Regional Operations Manager
- (b)(7)(C) Central Regional Operations Manager
- (b)(7)(C) Northeast Regional Operations Manager
- (b)(7)(C) Southeast Regional Operations Manager
- (b)(7)(C) Technology Regional Manager
- (b)(7)(C) Technology Regional Manager

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(b)(7)(C)

PROPOSED ISAP IV PROGRAM DIRECTOR

Telephone: (b)(7)(C)   Email: (b)(7)(C)

With nine years of ISAP experience and seven years of experience acting as the ISAP II and III Deputy Program Director, I have coordinated with the Program Director on operational oversight of the ISAP program. As the Deputy Program Director, I have directed several complex and sensitive projects that focused on quality assurance, policies and procedures, staffing, program outcomes, and outreach with community based stakeholders. In addition, I have managed seven community corrections facilities and a staff of 170 employees entrusted with supervising 725 state and federal offenders.

✓ **EDUCATION**
Master of Science, Criminal Justice
Bachelor of Science, Criminal Justice
EXCEEDS

✓ **RELEVANT EXPERIENCE**
16 Years
EXCEEDS

ACCOMPLISHMENTS

🌐 **LANGUAGES**
English, Spanish

🛡 **LAW ENFORCEMENT**
7 Years Experience

🤝 **CASE MANAGEMENT**
9 Years Experience

📅 **TENURE WITH ISAP**
9 Years

EXPERIENCE

BI Incorporated | 2010-Present

Deputy Program Director, ISAP

- Worked in coordination with the previous Program Director to ensure effective implementation and operation of the ISAP contract
- Identified and implemented operational efficiencies to ensure staffing ratios were met
- Provided direct operational oversight of locations designated by the previous Program Director
- Coordinated daily, monthly, quarterly, and annual reporting processes
- Ensured that corrective action plans are implemented promptly

ISAP Northeast Regional Manager

- Served as the single point of contact for the Northeast region of the United States
- Provided operational and financial oversight of 10 ISAP offices with a capacity of approximately 3,500 program Participants
- Provided direct supervision to eight Program Managers in eight different cities throughout the northeast region of the country
- Ensured that all offices remained in compliance with contractual standards and budgetary guidelines
- Devised and implemented strategies to maximize positive outcomes in each ISAP office
- Maintained frequent contact with local ICE officials in each city to ensure that local ISAP offices fulfilled contractual obligations

Vice President of Correctional Services

- Led the operations of seven residential community corrections programs that supervised incarcerated individuals with a total capacity of 725 state and federal offenders and 170 employees

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- Evaluated program structure and operations, as well as implemented changes to ensure that each program operated at an optimal level
- Identified potential growth areas and new contract opportunities, as well as wrote and submitted contract proposals to new potential funding sources
- Maintained close contact with the Pennsylvania Department of Corrections and Federal Bureau of Prisons to ensure that all programs met contractual requirements
- Monitored and analyzed trends with regard to program performance, program census, staffing, revenue, and petty cash expenditures

Director of Community Correctional Services

- Provided oversight of five community corrections programs that monitored incarcerated individuals with a total capacity of 530 state and federal offenders and more than 100 employees
- Conducted mock program audits to ensure that all programs complied with contractual standards and the accreditation standards of the American Correctional Association (ACA)
- Assessed areas of need within specific programs, as well as implemented action plans to ensure that those needs were addressed
- Wrote contract proposals in response to RFPs for both new and existing contract opportunities

Project Director

- Supervised the operation of a 130-bed community corrections program and a 100-bed in-patient drug and alcohol treatment program
- Supervised a staff of 45 employees
- Ensured that both programs met ACA standards and coordinated the successful reaccreditation of both programs through the ACA
- Maintained regular contact with outside maintenance and service contractors to ensure that all program needs were met

Facility Director

- Oversaw the day-to-day operations of a 130-bed community corrections program for federal inmates
- Established and implemented policies and procedures regarding facility administration, clinical services, security, sanitation, and maintenance
- Managed the supervision, training, and evaluation of 25 employees
- Maintained oversight of financial accounts and monthly revenue
- Conducted regular program audits to ensure that all contractual standards were met
- Maintained regular contact with Federal Bureau of Prisons staff regarding future referrals as well as issues with current residents

The Kintock Group | 2001-2003
Case Manager

- Developed and monitored comprehensive care plans that met the needs of the client
- Provided clients and their families with information on community and agency services to assist them in addressing their needs
- Maintained details case notes on each client and ensured that they upheld all court stipulations

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COMMITMENT STATEMENT

❝ **I understand that my role as Program Director for ISAP IV is critical to successful ISAP operations. With the submission of BI's proposal, I reaffirm my commitment to supporting the ERO's mission.**

During ISAP IV, I will remain committed to ethically and responsibly performing my job duties, regularly communicating with ERO, supporting BI staff success, and focusing on driving outcomes.

I look forward to supporting the United States Government throughout the next contract term. ❞

(b)(7)(C)

(b)(7)(C) Executive Vice President
Authorized Corporate Representative

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(b)(7)(C)

PROPOSED ISAP IV DEPUTY PROGRAM DIRECTOR

Telephone (b)(7)(C)   Email: (b)(7)(C)

Proficient in managing all aspects of large-scale, high-profile government programs, I have led teams of talented cross-functional professionals across multiple locations, while simultaneously exercising accountability for all program budgets, accounting, P&L, and expense control. My ability to envision, develop, and deploy innovative strategies across process improvement, operations management, and compliance, has been instrumental in improving program productivity and effectiveness.

✓ **EDUCATION**
Bachelor of Arts, Criminal Justice

✓ **RELEVANT EXPERIENCE**
11 Years
EXCEEDS

ACCOMPLISHMENTS

🌐 **LANGUAGES**
English

🛡 **LAW ENFORCEMENT**
N/A

🤝 **CASE MANAGEMENT**
11 Years Experience

📅 **TENURE WITH ISAP**
11 years

EXPERIENCE

BI Incorporated | 2008-Present

Regional Manager, ISAP

- Responsible for directing 17 operations throughout the Northeast region of the United States, with executive authority over a team of 150 field staff employees
- Engaged in a broad spectrum of HR functions including recruitment, hiring, training, and conducting performance evaluations
- Served a critical role as the primary point of contact for all issues relating to DHS/ICE Headquarters
- Accountable for all P&L, accounting, budgeting, expense control, and payroll
- Instrumental in enforcing compliance by up to 15,400 immigrants participating in the program, including all reporting requirements, electronic monitoring via GPS and voice verification, unannounced home visits, and local office appointments
- Leveraged superior subject matter expertise to lead discussions on immigration and detention alternatives to audiences of high-ranking government and non-government employees and foreign dignitaries
- Developed and presented briefings before Department of Homeland Security leadership, including the ERO Director, USCIS District Director, the Civil Rights & Civil Liberties Division, and key stakeholders in the ICE ATD HQ Unit.
- Ensured strict adherence to all Quality Control standards as defined by The GEO Group and the Department of Homeland Security (DHS)
- Contributed additional service and expertise facilitating the development and evolution of pilot programs to improve operational effectiveness, including Electronic Monitoring Alert Management, Kiosk, and P!NG, as well as a new proprietary corporate software platform

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EXPERIENCE (continued)

Case Specialist

- Collaborated with the Department of Homeland Security, Bureau of Immigration, and Customs Enforcement to monitor illegal immigrants pending court removal proceedings, ensuring compliance with Immigration Court orders and Administrative decisions
- Gained invaluable experience with an array of monitoring activities and reporting requirements including home and office visits, employment verification, electronic monitoring, and curfews
- Envisioned, developed, and implemented case management strategies focusing on individual service plans to prioritize and satisfy immigration court order requirements
- Introduced innovative methods to track statistical data, aligned with present and anticipated functions of the ISAP program
- Engaged with multiple embassies to ensure progress in the application and issuance of travel documents required for removal to host countries

Delaware County District Attorney's Office | 2008
Forensic Accountant Intern

- Assumed a lead role reviewing bank records and performing forensic accounting to identify fiscal transgressions
- Led interviews to compile information and gather statements from Delaware County residents affected by financial crime
- Executed a broad and deep variety of trial preparation responsibilities, including the drafting of case summaries and affidavits
- Led community outreach efforts to educate local townships in the development of strategies to identify and prevent financial crimes

COMMITMENT STATEMENT

❝ **I understand that my role as Deputy Program Director for ISAP IV is critical to successful ISAP operations. With the submission of BI's proposal, I reaffirm my commitment to supporting the ERO's mission.**

During ISAP IV, I will remain committed to ethically and responsibly performing my job duties, regularly communicating with ERO, supporting BI staff success, and focusing on driving outcomes.

I look forward to supporting the United States Government throughout the next contract term. ❞

(b)(7)(C)

(b)(7)(C) Executive Vice President
Authorized Corporate Representative

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(b)(7)(C)

NORTHWEST REGIONAL OPERATIONS MANAGER

Telephone (b)(7)(C)   Email: (b)(7)(C)

ACCOMPLISHMENTS

EDUCATION
Bachelor of Arts, English with Early Modern Studies Specialization

Bachelor of Arts, Spanish

LANGUAGES
English, Spanish

LAW ENFORCEMENT
N/A

CASE MANAGEMENT
10 Years of Experience

TENURE WITH ISAP
10 Years

EMPLOYEES MANAGED
117 ISAP Employees

OFFICES MANAGED
23 ISAP Offices

GOVERNMENT EXPERIENCE
10 Years

EXPERIENCE

BI Incorporated | 2009-Present
Northwest Regional Operations Manager, ISAP

- Responsible for direct management of 15 ISAP Program Managers, program operations, and profitability for all ISAP offices within the Northwest area of responsibility
- Develop and implement strategies and action plans that will enable the offices to achieve their operational and financial objectives
- Develop, implement, review, and update policies, plans, and procedures of Office operations
- Responsible for ensuring ISAP offices within the Northwest Region establish and maintain frequent and productive communication with key contacts in community-based organizations to assure and maintain community receptivity and support of ISAP

ISAP Denver Program Manager

- Enforced daily staff schedule for contractual compliance and cost-control (overtime)
- Served as point of contact during ISAP II Northwest Regional Program Manager and West Operations Manager's absence
- Designated as sole Program Manager to attend the First Headquarters Alternatives to Detention Monitoring Officer meeting to represent nationwide program manager perspective
- Sought and identified NGOs throughout the community to continue program support
- Handled assignation and direction of work, praise and discipline, and resolving any reported or observed complaints of Case Specialists and Participants
- Developed and implemented strategies to enable the office to achieve its operational objectives and financial objectives
- Met and exceeded the financial budget goals
- Contractual compliance met with high compliance scores
- Consultant fprogram growth plans, streamlining office operations, and staff motivation throughout the organization
- Served as primary local Denver Department of Homeland Security point of contact; met regularly to assess program, troubleshoot, present, or address potential issues, and consistent reporting of progress, emergencies or other unusual occurrence
- Served as subject matter expert presenter at Emerging Leaders Academy
- Conducted ISAP II/III Program and Technology trainings for local customer and at ERO's Training Forum in Boulder, CO

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EXPERIENCE (continued)

- Successfully proctored numerous program hardware and software pilot projects:
  o EOIR Expedited court docket
  o Pachira TotalAccess
  o LOC8 Beta testing
  o Kofax Scanner
  o SmartLINK
  o LOC8 beacon beta testing

ISAP Senior Case Specialist

- Responsible for all Case Specialist duties along with planning and implementation of new home visit protocols in San Bernardino ISAP for overtime reduction and increased efficiency while maintaining contractual compliance (Emerging Leaders project)
- Served as a traveling mentor and assisted ISAP II/III offices in San Diego, El Paso, Dallas, New Orleans, San Francisco, Washington DC, Karnes, Houston, Seattle, Los Angeles, San Bernardino, and Detroit

ISAP Case Specialist

- Conducted case management and supervision of 75 to 200 count caseload. Expert in installing and tracking electronic monitoring equipment and alerts, Face to Face office visits, home visits, development of service plans and risk/needs assessments, providing community resource referrals, and court appearance and court order compliance

ISAP Administrative Assistant

- Provided front office duties, organization of Participant daily reporting, technology inventory, management reports, and ordering office supplies within budget

Kendren Community Mental Health Center | 2007-2009
Case Manager

- Conducted daily case management tasks for caseloads of up to 25 families
- Provided children and caregivers with resources in the community as well as intervention services including: individual rehabilitation sessions during home or school visits, prevention programs, and therapy
- Assured compliance of medication, treatment goals, court appearance, and Department of Children and Family Services involvement
- Completed numerous trainings:
  o Nonviolent Crisis Intervention
  o Trauma and Co-Occurring Disorders
  o Child Abuse Reporting
  o Field Safety
  o Department of Mental Health note writing
- Assisted with coordinating and supervising the United Peace Officers Against Crime gang intervention program

Alpha Thrift Store | 2007
Store Supervisor

- Supervised 15+ employees' activities while also keeping high standards for customer service
- Responsible for training and mentoring staff on store protocols, and customer service
- Handled praise and discipline of employees
- Resolved any reported or observed complaints from customers and staff
- Input data into the store's software program for donation soliciting

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COMMITMENT STATEMENT

" **I understand that my role as Northwest Regional Operations Manager for ISAP IV is critical to successful ISAP operations. With the submission of BI's proposal, I reaffirm my commitment to supporting the ERO's mission.**

During ISAP IV, I will remain committed to ethically and responsibly performing my job duties, regularly communicating with ERO, supporting BI staff success, and focusing on driving outcomes.

I look forward to supporting the United States Government throughout the next contract term. "

(b)(7)(C)

(b)(7)(C) Executive Vice President
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(b)(7)(C)

SOUTHWEST REGIONAL OPERATIONS MANAGER

Telephone: (b)(7)(C)　　**Email:** (b)(7)(C)

ACCOMPLISHMENTS

EDUCATION
Bachelor of Arts,
Political Science

Bachelor of Science,
Criminal Justice

LANGUAGES
English

LAW ENFORCEMENT
N/A

CASE MANAGEMENT
11 Years of Experience

TENURE WITH ISAP
12 | 11 Years

EMPLOYEES MANAGED
132 ISAP Employees

OFFICES MANAGED
14 ISAP Offices

GOVERNMENT EXPERIENCE
12 Years

EXPERIENCE

BI Incorporated | 2008-Present
Southwest Regional Operations Manager, ISAP

- Serve as primary point of contact for ISAP Southwest Region
- Responsible for contract compliance, outcomes, budget management, program management, and personnel management
- Perform oversight for all ISAP operations (Contractor, Government, and Staging Sites) in the following Areas of Responsibility (AOR): Los Angeles, San Diego, San Francisco, Phoenix, and El Paso
- Responsible for the following AORs from 2016-2017: San Antonio, Houston, Dallas, Salt Lake City, and Seattle
- Tasked with special projects including the development of policies, procedures, guidelines, and objectives to support program goals

ISAP Program Manager II

- Managed 18 Case Specialists, 1 Administrative Assistant, and the full range of office operations for the ISAP II/III program
- Responsible for contract compliance, outcomes, budget management, program management, and personnel management
- Resolved broad and complex problems associated with the planning, coordination, and execution of contract/program
- Monitored contract compliance by conducting file audits and implementing corrective action plans
- Created and maintained extensive program budget
- Provided value added internal and external customer support and service. Prepare detailed investigative, statistical, verbal, and written case reports to ICE/ERO
- Task with investigating, tracking, compiling, and reporting out daily, weekly, and monthly regarding outcomes
- Developed, facilitated, and conducted training for employees and federal officers, including conducting multi-purpose presentations for ICE/ERO and NGOs for program education
- Established and maintained key contacts with NGOs to ensure program support, efficiency, and positive outcomes
- Resolved emergency situations, client/customer complaints, and manage all personnel matter

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EXPERIENCE (continued)

ISAP Program Manager I

- Managed 8 Case Specialists, 1 Administrative Assistant, and all office operations of a Department of Homeland Security (DHS) Alternative to Detention program
- Created and maintained extensive program budget
- Developed strong professional relationships with DHS Officers and Management by daily communication regarding growth, program direction, and outcomes
- Developed, optimized, and implemented daily operations with a focus on compliance and producing favorable outcomes; tracked, compiled, and reported out daily, weekly, and monthly outcomes to ICE/ERO
- Prepared and reviewed detailed investigative, statistical, verbal, and written reports to ICE/ERO management
- Conducted monthly file audits and corrective action plan
- Resolved emergency situations, participant and customer complaints, and handled all personnel matters
- Developed and trained staff based on office efficiency and need
- Networked with community agencies to assist in positive outcomes

Senior Case Specialist and Intensive Supervision Case Specialist

- Managed a caseload of 125 in a technology assisted, federal alternative to detention program, while acting as team lead for 6 staff members. Maintained all Case Specialist duties as indicated below
- Worked closely with supervisor to develop and improve daily operations Responsible for running all office operations in the absence of the Supervisor.
- Conducted monthly file audits and created corrective action plans
- Organized, created, and presented detailed verbal and written reports to ICE/ERO
- Oversaw Home Visit Operations, including maintaining a database of 1000+ Participants while tracking individual and program compliance rates, monitoring staff completion rates, and route creations
- Conducted bi-monthly GPS/electronic monitoring inventory reviews and reports• Supervised 180+ caseload in a technology assisted, federal alternative to detention program
- Conducted detailed interviews, intakes, and assessments to determine potential individual, community, and program compliance risks
- Conducted office visits, home visits, and monitored offender whereabouts 24/7/365; including daily investigation of participant whereabouts, compliance, criminal activity, and potential risks
- Complied with strict contractual obligations and deadlines while continuously producing high positive outcomes
- Responsible for efficient and accurate maintenance of electronic case management databases and hard file documentation
- Responsible for planning and providing appropriate community referrals individually tailored to each case's specific needs, in order to minimize risks
- Communicated daily with ICE/ERO regarding individual case and program compliance status.

Boystown Inc. | 2008
Night Case Manager

Accident Attorney's | 2007
Pre-Litigation Manager

Clerk of the Court of Cook County | 2006
Deputy Clerk

COMMITMENT STATEMENT

❝ **I understand that my role as Southwest Regional Operations Manager for ISAP IV is critical to successful ISAP operations. With the submission of BI's proposal, I reaffirm my commitment to supporting the ERO's mission.**

During ISAP IV, I will remain committed to ethically and responsibly performing my job duties, regularly communicating with ERO, supporting BI staff success, and focusing on driving outcomes.

I look forward to supporting the United States Government throughout the next contract term. ❞

(b)(7)(C)

(b)(7)(C) Executive Vice President
Authorized Corporate Representative

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(b)(7)(C)

CENTRAL REGIONAL OPERATIONS MANAGER

Telephone (b)(7)(C)   **Email:** (b)(7)(C)

ACCOMPLISHMENTS

EDUCATION
Master of Science, Criminology

Bachelor of Science, Criminal Justice

LANGUAGES
English, Spanish

LAW ENFORCEMENT
N/A

CASE MANAGEMENT
8 Years of Experience

TENURE WITH ISAP
8 Years

EMPLOYEES MANAGED
122 ISAP Employees

OFFICES MANAGED
16 ISAP Offices

GOVERNMENT EXPERIENCE
8 Years

EXPERIENCE

BI Incorporated | 2012-Present

ISAP Program Manager

- Develop timely and accurate reports on the status of program operations, develop and implement strategies and action plans that will enable the office to achieve its operational and financial objectives
- Serve as the local point of contact with DHS and the Contracting Office Technical Representative (COTR), providing accurate and timely monthly reports, annual reports, verbal and written notification of emergencies, contingencies, or unusual occurrences
- Meet with COTR regularly to provide a management level review, assess program performance, and discuss and resolve problems
- Maintain and document routine communication with staff, such as staff meetings to address participant service plans and progress, and case specialists' daily schedules
- Establish and maintain frequent and productive communication with key contracts in community-based organizations to assure and maintain community receptivity and support for ISAP
- Evaluate, identify, and describe contingencies for reducing potential community issues focused on the program, facility locations, general public opposition, or other issues that could mitigate the success of ISAP
- Administer Security Plan for a specific office, including daily operations, security contingencies, emergencies and mitigation plans, security of BI and DHS employees, and participants and the general public

ISAP Senior Case Specialist

- Implemented systems to physically track and supervise all Program Participants via GPS units or a voice recognition system

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EXPERIENCE (continued)

- Administered the Quality Control Plan, including performance of monthly audits to evaluate program operations for compliance with the Quality Control Plan and contract requirements
- Ensured that corrective actions plans are implemented in a timely manner when necessary
- Oversaw preparation of documentation to acquire DHS direction and action if disciplinary measures are necessary, while managing participant violations in conjunction with ISAP Case Specialists
- Reviewed and approved participant service plans to ensure compliance with state requirements and contractual obligations
- Carried out supervisory responsibilities in accordance with BI policies and applicable laws, including: interviewing, hiring and training employees; planning, assigning and directing work; appraising performance; rewarding and disciplining employees; and addressing complaints and resolving problem

Google/G4S Secure Solutions | 2008-2012
Case Manager

- Managed access control, monitor camera, alarms, address safety, and security concerns
- Carried out supervisory responsibilities in accordance with G4S and Google policies and applicable laws. Responsibilities included: training employees; planning, assigning and directing work; appraising performance; rewarding and disciplining employees; addressing complaints and resolving problems
- Maintained security clearance for access to servers containing government information

COMMITMENT STATEMENT

❝ **I understand that my role as Central Regional Operations Manager for ISAP IV is critical to successful ISAP operations. With the submission of BI's proposal, I reaffirm my commitment to supporting the ERO's mission.**

During ISAP IV, I will remain committed to ethically and responsibly performing my job duties, regularly communicating with ERO, supporting BI staff success, and focusing on driving outcomes.

I look forward to supporting the United States Government throughout the next contract term. ❞

(b)(7)(C)

(b)(7)(C) Executive Vice President
Authorized Corporate Representative

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(b)(7)(C)

NORTHEAST REGIONAL OPERATIONS MANAGER

Telephone (b)(7)(C)   Email: (b)(7)(C)

ACCOMPLISHMENTS

EDUCATION
Master of
Administrative
Science

Bachelor of
Individualized
Studies

LANGUAGES
English

LAW ENFORCEMENT
28 Years

CASE MANAGEMENT
4 Years of Experience

TENURE WITH ISAP
4 Years

EMPLOYEES MANAGED
185 ISAP Employees

OFFICES MANAGED
18 ISAP Offices

GOVERNMENT EXPERIENCE
32 Years

EXPERIENCE

BI Incorporated | 2015-Present
ISAP Program Manager

- Develop timely and accurate reports on program operations, develop and implement strategies and action plans that enable the office to achieve operational and financial objectives
- Provide to DHS accurate and timely monthly reports, annual reports, verbal and written notification of emergencies, contingencies, or unusual occurrences
- Maintain and document routine communication with staff, such as staff meetings to address participant service plans and progress, and case specialists' daily schedules
- Establish and maintain frequent and productive communication with key contracts in community-based organizations to assure and maintain community receptivity and support for ISAP
- Evaluate, identify, and describe contingencies for reducing potential community issues focused on the program, facility locations, general public opposition, or other issues that could mitigate the success of ISAP

Visual Computer Solutions | 2010-2011
Security Supervisor

- Managed software installation, configuration and training for client base
- Developed process for advising Senior Management of each account's status
- Integrated client base to full function status
- Transitioned client base to technical support and supervised that status
- Completed numerous trainings:

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EXPERIENCE (continued)

Atlantic County Government | 1984-2010
Director of Adult Detention

- Managed and directed day to day security operations for a large penal institution
- Security expert- Operations commander with extensive IT infrastructure expertise for 10+ years, managing all security systems in a large penal institution
- Completed internal/external demeanor, employee policy compliance and criminal investigations
- Taught at Police and Corrections academies
- Established policy regarding grounds and building patrols
- Conducted analysis to address overcrowding, which led to a reduction of inmate population and state mandated compliance
- Conducted analysis to address staffing issues that led to installation of software applications which created fiduciary and work low proficiency
- Initiated key local and national partnerships
- Identified and subsequently provided onsite training to reduce work place litigation
- Developed new process for employee evaluation, which resulted in marked performance improvements
- Effectively controlled the release of sensitive information to control media coverage of high profile incidents

COMMITMENT STATEMENT

❝ **I understand that my role as Northeast Regional Operations Manager for ISAP IV is critical to successful ISAP operations. With the submission of BI's proposal, I reaffirm my commitment to supporting the ERO's mission.**

During ISAP IV, I will remain committed to ethically and responsibly performing my job duties, regularly communicating with ERO, supporting BI staff success, and focusing on driving outcomes.

I look forward to supporting the United States Government throughout the next contract term. ❞

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Authorized Corporate Representative

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(b)(7)(C)

SOUTHEAST REGIONAL OPERATIONS MANAGER

Telephone: (b)(7)(C)   **Email:** (b)(7)(C)

ACCOMPLISHMENTS

EDUCATION
Master of
Administration
Graduate Certificate,
Public Management

Bachelor of Science,
Criminal Justice

Bachelor of Arts,
Philosophy, minor
in Spanish

Master of Arts,
Criminal Justice

LANGUAGES
English, Spanish

LAW ENFORCEMENT
N/A

CASE MANAGEMENT
12 Years of Experience

TENURE WITH ISAP
12 10 Years

EMPLOYEES MANAGED
170 ISAP Employees

OFFICES MANAGED
24 ISAP Offices

GOVERNMENT EXPERIENCE
12 Years

EXPERIENCE

BI Incorporated | 2009-Present
Southeast Regional Operations Manager, ISAP

- Responsible for the operational oversight for 24 ISAP locations in the Southeast Region, consisting of: 14 Contractor Offices, 7 Government Sites and 3 Staging Sites
- Work directly with Department of Homeland Security HQ on key initiatives
- Provide recommendation and coordinate implementation on new program components

Program Manager, ISAP Seattle

- Was responsible for operational and financial oversight for Seattle, Yakima, and Richland locations
- Managed and directed all activity in the planning, development, and implementation of services
- Supervisory responsibilities included hiring, training, directing work, and appraising performances
- Annual compliance review scores consistently amongst the highest in the country.
- Conducted RGV Pilot Project and provided implementation recommendations for permanent site
- Worked directly with Department of Homeland Security HQ on key initiatives

Case Specialist, ISAP Seattle

- Provided contracted supervision and case management services for program participants
- Selected for the first Emerging Leaders Program for ISAP
- Traveled to assist other ISAP Offices/ Government Sites nationwide

Victim/Witness Services for Coconino County, AZ | 2007-2009
Sexual Violence Victim Advocate
Victim Advocate II
Victim Advocate I

- Maintained a specialized caseload of felony crimes, including sex crimes and homicide
- Provided court advocacy, crisis response, and community referrals
- Supervised, trained, and evaluated Victim Advocate Volunteers and interns

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EXPERIENCE (continued)

- Created and conducted trainings for law enforcement and government agencies
- Coordinator for the Coconino County Sexual Assault Response Team
- Organized and facilitated the Coconino County DUI Impact Panel

COMMITMENT
STATEMENT

❝ **I understand that my role as Southeast Regional Operations Manager for ISAP IV is critical to successful ISAP operations. With the submission of BI's proposal, I reaffirm my commitment to supporting the ERO's mission.**

During ISAP IV, I will remain committed to ethically and responsibly performing my job duties, regularly communicating with ERO, supporting BI staff success, and focusing on driving outcomes.

I look forward to supporting the United States Government throughout the next contract term. ❞

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(b)(7)(C) | Executive Vice President
Authorized Corporate Representative

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(b)(7)(C)

TECHNOLOGY REGIONAL MANAGER

Telephone: (b)(7)(C)   Email: (b)(7)(C)

ACCOMPLISHMENTS

🎓 **EDUCATION**
Master of Science, Criminal Justice

Bachelor of Arts, Psychology/ Minor in Criminal Justice

Correctional Officer Training

🌐 **LANGUAGES**
English

🛡️ **LAW ENFORCEMENT**
4 Years Experience

🤝 **CASE MANAGEMENT**
10 Years Experience

📅 **TENURE WITH ISAP**
10 Years

🗺️ **EMPLOYEES MANAGED**
N/A

OFFICES MANAGED
N/A

🏛️ **GOVERNMENT EXPERIENCE**
12 Years

EXPERIENCE

BI Incorporated | 2007-Present
ISAP Technology Regional Manager

- Responsible for the oversight of the Technology component of ISAP III as part of a contract with the Department of Homeland Security Alternatives to Detention program
- Consult directly with ERO customers throughout the country, assisting in business development and program expansion
- Tasked as point of contact for DHS Headquarters on issues that deal with technology offices, as well as, Enforcement and Removal Office sites

ISAP North East Regional Operations Manager

- Provided oversight for 11 offices, 9 program managers and 50+ staff as part of a contract with the Department of Homeland Security Alternatives to Detention program
- Promoted business and revenue expansion, assisting with two new office locations and an increase in business revenue by 8%, while maintaining a 19.5 million dollar budget
- Served as point of contact for DHS Headquarters on issues that deal with Enforcement and Removal Office locations in the Northeast

ISAP National Technology Manager

- Responsible for the oversight of the Technology component of ISAP II as part of a contract with the Department of Homeland Security Alternatives to Detention program
- Increased ERO office usage to 90 plus offices around the country and 11000 plus participants on technology
- Served as the point of contact for DHS Headquarters on issues that deal with technology and with Enforcement and Removal Office sites
- Liaised with various areas of BI Inc. including the product management team, the hardware operations group, marketing and the training department

Account Representative

- Provided support of accounts through training along with assistance to enable customers to operate effective programs with high satisfaction levels, including solutions regarding cost issues for customers' facing budget cuts

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EXPERIENCE (continued)

- Tasked with training of new accounts in the Southeast and the expansion of existing accounts
- Solved billing-related administrative issues and price correction work in conjunction with accounts receivable
- Accomplished clearing up an overdue debt of over $100,000 for one account and significantly reduced the entire DSO of the Southeast region
- Recognized for exceptional people skills and ability to build rapport with the customer

Broward Sheriff's Office | 2003-2007
Supervisor Day Reporting & Re-entry

- Managed a team of four case managers, two court personnel, and two administrative staff in the monitoring of offenders participating in the Day Reporting and Re-entry Center
- Tasked to hire, train, discipline, and promote professional development as part of program management
- Served as team leader when expanding the program from zero court orders to over 200 in one year
- Helped develop core curricula for employment and treatment of offenders and was considered key person tasked with training staff on Motivational Interviewing
- Liaised with internal and external entities. i.e. criminal justice agencies, treatment providers, and all referral sources

Classification Specialist

- Reviewed inmate information and analyzed risk factors, evaluated potential threat to self and/or others, and recommended housing placement
- Conducted inmate orientation and performed inmate interviews when necessary, made recommendations concerning inmate needs and transfers, and responded to inmate requests in both verbal and written contexts
- Evaluated new inmate classification procedures and presented findings to management, leading to a new process that was implemented based on my research

Lemco Marketing Company Ltd. | 2001-2002
Project Manager

Hampden County Sheriff's Department | 1993-2000
Case Manager
Treatment Supervisor
Domestic Violence Specialist and Counselor

Charles River Hospital West | 1992-1995
Psychiatric Technician

COMMITMENT STATEMENT

" **I understand that my role as Technology Regional Manager for ISAP IV is critical to successful ISAP operations. With the submission of BI's proposal, I reaffirm my commitment to supporting the ERO's mission.**

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I look forward to supporting the United States Government throughout the next contract term. "

(b)(7)(C)

(b)(7)(C) Executive Vice President
Authorized Corporate Representative

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(b)(7)(C)

TECHNOLOGY REGIONAL MANAGER

Telephone: (b)(7)(C) **Email:** (b)(7)(C)

ACCOMPLISHMENTS

EDUCATION
Bachelor of Arts, Criminal Justice
and Interpersonal
Relations/Counseling
Psychology

LANGUAGES
English

LAW ENFORCEMENT
N/A

CASE MANAGEMENT
N/A

TENURE WITH ISAP
13 Years

EMPLOYEES MANAGED
N/A

OFFICES MANAGED
N/A

GOVERNMENT EXPERIENCE
13 Years

EXPERIENCE

BI Incorporated | 2005-Present
ISAP Technology Regional Manager

- Oversee and provide customer support to 96 ERO offices across the country utilizing BI's GPS, biometric voice, and facial verification technology to supervise approximately 34,000 program participants
- Liaison between BI and ICE HQ for all programmatic and electronic monitoring questions as it relates to BI's monitoring technologies
- Responsible for program growth, data integrity, billing, and reporting as it relates to the technology component of the ISAP contract
- Ensure efficient and effective delivery of services in compliance with contractual obligations
- Develop and implement strategies to identify and mitigate potential issues by working with ERO personnel and internal BI departments

ISAP Training Specialist

- Tasked as the Lead Corporate Trainer for the ISAP
- Created and implemented the ISAP contract-training curriculum using e-Learning, online webinars, teleconferences, and on-site training
- Recruited, trained, and certified over 350 BI employees and over 200+ ICE officers on the ISAP contract, BI's case management software and electronic monitoring equipment and software
- Selected as the lead on BI's VoiceID (biometric voice recognition technology) platform. Outlined requirements and specific business rules, participated in testing, created training and marketing documents
- Assisted in writing and implementing the ISAP Policy and Procedures
- Ensured all requirements are met for ISO certification purposes

2nd Shift Assistant Supervisor

- Served as a resource to the Monitoring Services Specialists; helping with troubleshooting, procedure questions, and system issues
- Point of contact for customer complaints and follow up
- Responsible for monthly scheduling of specialists and ensuring coverage for all accounts

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EXPERIENCE (continued)

Kohl's Department Store | 2003-2005
Loss Prevention Officer

- Assisted the District Trainer in training new officers for the company's mandatory certification requirements
- Completed case reports for the Anderson Police Department and testified in court when subpoenaed
- Awarded 6th place in the Corporation in apprehensions for 2004

COMMITMENT STATEMENT

"" **I understand that my role as Technology Regional Manager for ISAP IV is critical to successful ISAP operations. With the submission of BI's proposal, I reaffirm my commitment to supporting the ERO's mission.**

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(b)(7)(C)

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Authorized Corporate Representative

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Appendix B—Response to RFP Attachment 2: ECMS

1. ENACT STAFFING PLAN
2. WORK WITH COMMUNITY PROVIDERS
3. DELIVER CASE MANAGEMENT SERVICES
4. PROVIDE DATABASE AND REPORTS
5. IMPLEMENT TERMINATION SERVICES

STATEMENT OF COMPLIANCE

Applicable RFP Sections:
Attachments: 2

As border entries rise and participants with more complex needs continue to be enrolled in ISAP, ERO requires a solution to stabilize participants who may have significant vulnerabilities. BI understands that stable participants are more likely to comply with ISAP requirements.

In 2015, GEO Care—a division of BI's parent company, The GEO Group—was awarded five DHS Family Case Management Program (FCMP) contracts. The FCMP offices were implemented to stabilize higher need immigrant families. The BI team that assisted in the development of FCMP is the same team that helped to develop ISAP and ECMS operations, evidencing our unmatched experience with this type of population.

EXTENDED CASE MANAGEMENT SERVICES (ECMS)
BI offers a comprehensive, ECMS program focused on stabilizing participant populations and leveraging our nationwide infrastructure of NGO partners.

Figure 17. Approach to Higher-Needs Populations

ECMS is a component of ISAP IV that uses enhanced case management and services to help stabilize higher need participants and support compliance. BI understands that all adult individuals and their non-U.S. citizen dependents are eligible for enrollment in ECMS and that ICE/ERO has sole discretion in selecting ECMS participants. ECMS includes all ISAP case management components detailed in our Case Management Plan, along with the elements outlined in *Figure 17*.

① ENACT STAFFING PLAN

BI will continue to draw upon the expertise of our SMEs (see SME Experience and Qualifications), specifically (b)(7)(C) to provide ECMS-specific training, which includes supporting individuals who may have significant vulnerabilities. Case Specialists who interact with ECMS participants receive special training to guide trauma-informed care in compliance with ISAP requirements.

All Staffing Plan processes apply to ECMS. By implementing our ISAP IV *Staffing Plan,* BI will maintain *RFP*-required ECMS staffing ratios of (b)(4) The lower caseload ratios allow us to focus on the specific needs of the ECMS population. All Program Managers and at least one Case Specialist per C-site are currently trained in providing enhanced services and are capable of tracking referrals for stabilization services.

② WORK WITH COMMUNITY PROVIDERS

BI has extensive experience providing referrals to support participant stabilization in the community. GEO Executive Vice President of Immigration Services, (b)(7)(C) will lead oversight of NGO subcontracts for Cultural Orientations and Know Your Rights presentations, as well as overall community service provider management. (b)(7)(C) will oversee NGO relations and lead a *Community Reference Committee* consisting of NGO partners.

BI will continually update and maintain the (b)(4); (b)(7)(E) database. In addition to connecting ECMS participants with local legal organizations, BI will coordinate Know Your Rights presentations. These presentations will continue to be held at BI ISAP offices and will be conducted by Community Service Providers thoroughly trained on the Know Your Rights principles.

Risk Mitigation

The Community Reference Committee allows CBOs/NGOs to be informed on the positive aspects of ECMS, have a voice and understanding of the process, thus increasing awareness and fostering support of ERO's Mission.

Presentation topics will include court process, citizenship, cancellation of removal, adjustment of status through petitions, free or low-cost legal services, voluntary departure, notice, of intent to issue a final administrative removal order, and orders of supervision. Our processes for Providing Referrals and performing Community Outreach also apply to our ECMS approach.

③ DELIVER CASE MANAGEMENT SERVICES

Using the ISAP case management model (see Case Management Plan) as the foundation for ECMS service delivery, BI will conduct a more in-depth assessment, developing a detailed ISP that outlines how we will address identified needs and addressing areas that require more

immediate attention for vulnerable ECMS participants. This process includes identifying, providing, and verifying community referrals. To support ECMS participant compliance and stability, BI's approach to providing case management services for this population includes the following objectives:

- Help the family identify and prioritize challenges.

- Develop specific, measurable goals and outcomes with corresponding action plans.

- Identify available community resources to help achieve program objectives.

- Work with non-profit organizations to provide services.

- Address the participant's immediate needs.

- Identify resources and help participants connect with those resources.

- Provide effective referrals that align with needs, as well as verify that participants engage with provided referrals by following up after appointments.

- Implement confidentiality practices when discussing and documenting medical and mental health conditions.

- Leverage the resources in the TotalAccess Community Service Provider database.

Assessment. As part of the enrollment and orientation process, qualified BI staff will perform a *Stability and Well-Being Assessment* for ECMS participants. Key topics addressed in this assessment are summarized in the following table.

Table 24. ECMS Assessment Subjects	
Topic	
Living Arrangements	Vocational Services
Available Transportation Services	Community Support Network
Medical Services	Behavioral and Mental Health Services
Legal Services	Financial Services
Family Dynamics	Nutrition Services: Education and Community Sources
Culture, Language, and Communication	Substance Abuse Services
Participant's Strengths	Orientation to the United States: Basic Laws and Acceptable Behavior
Trauma Identification, Trauma-Informed Care, and Trauma Care	Educational Services

Level of Service and Contact. BI will provide the frequency of services described below for ECMS participants, meeting or exceeding the required six points of contact:

(b)(4)

scheduled home visits per month (not including the residence verification)

office visits per month

phone contacts with the participant per month

These contacts provide opportunities for continued assessments to address participant and non U.S. dependent needs. Case Specialists will monitor progress, make new community connections or resource referrals, and engage ERO contacts as appropriate.

Successful Home Visit: Ventura ISAP Office. While conducting a home visit, a BI Case Specialist noticed that a young child was missing school. The participant reported that she was unable to enroll her son due to being unvaccinated. The Case Specialist referred the participant to Conejo Free Clinic, an established partner located very close to the residence. The participant used the referral to acquire medical services for her son, and she was able to enroll the child in school.

Court Services. To promote compliance with release conditions and court decisions, BI will provide court tracking and case management. BI will provide the following services to promote Compliance with Release Conditions and final decisions of the Immigration Court:

- Identify the participant's stage in immigration proceedings.
- Identify and communicate ERO reporting obligations.
- Promote the participant's court appearance.
- Communicate release conditions.
- Support and verify compliance.
- Develop and conduct a Cultural Orientation presentation with preapproval from the COR.

④ PROVIDE DATABASE AND REPORTS

Community Service Provider Database. BI's Community Service Provider database is a network of local service providers built over BI's 15 years of ISAP experience. In support of ECMS objectives, BI will continue to update our case management system as the network of providers expands throughout ISAP IV.

Dependent Profiles. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

Custom Case Management Software

Several new case management features of
(b)(4); (b)(7)(E)

Linking Profiles. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

Reporting. BI will generate a monthly report (b)(4); (b)(7)(E) summarizing the progress of any ECMS participant, including information about program progress and the stabilization of the participant. BI will reassess each ECMS participant every 60 days and recommend to ERO if the participant should be enrolled in the traditional ISAP program.

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(b)(4); (b)(7)(E)

⑤ IMPLEMENT TERMINATION SERVICES

BI will provide the following participant termination services:

- Inform ECMS participants of their legal rights, responsibilities, and obligations.

- Reiterate rights, responsibilities, obligations, and consequences of noncompliance at every in-person meeting.

- Provide written resources, including materials produced by Community Service Providers, in the ECMS participant's native language.

- Provide participants with third-party presentations about legal rights, responsibilities, and obligations specific to non-detained immigrant populations (see Work with Community Providers).

When a principle participant is terminated from the ECMS component, BI will also terminate the participant's dependents.

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Appendix C—Technology Executive Summary

Immediately following this page, please find BI's *Technology Executive Summary*.

ISAP IV
APPENDIX C
TECHNOLOGY EXECUTIVE SUMMARY

(b)(7)(C)

(b)(4), (b)(7)(E)

)(4), (b)(7)(E)

CONFIDENTIAL AND PROPRIETARY
2022-ICLI-00039 400

Appendix D—Response to RFP Attachment 1: Detailed Technology Specifications

Immediately following this page, please find BI's response to *RFP Attachment 1*.

ISAP IV
BI'S RESPONSE TO RFP ATTACHMENT 1:
APPENDIX D

PROVEN • INNOVATIVE • RESPONSIVE

(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

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(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

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(b)(4); (b)(7)(E)

As detailed in our *Case Management* Plan, Case Specialists and/or ERO officers can call Monitoring Operations 24/7/365 for assistance with enrollments, schedule changes, reports, and other monitoring information requests. In the event that remote access is unavailable, BI will implement contingency plans that include hardware, software, and power redundancy to maintain data entry for Case Specialists and/or ERO officers.

Monitoring System Architecture—*BI Complies with All Requirements*

Prior to the ISAP IV contract award, BI will provide detailed architectural infrastructure information about all primary and backup electronic monitoring systems, including hardware, software, and power sources. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

Key Event Notification Schedule. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

BI complies with all notification schedules for ERO. Notifications will not exceed five minutes. If the primary notification method is unsuccessful, (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

Event Alert Procedures. BI contacts participants by phone upon system notification of a strap tamper, case tamper, proximity tamper, or no motion alert. If Monitoring Specialists are unable to reach the participant by phone, they will contact the ERO Task Manager within the hour by e-mail, call, or text, per ERO's request. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

event has occurred. BI provides written notification of the band, strap, and/or device tamper within 48 hours if no further issues occur. Step-by-step program violation notification processes are detailed in the *Case Management Plan.*

Low Battery Alerts. BI will contact the participant by phone when 25% of battery life remains. Should the battery reach 10% or less, the ERO case officer will receive an alert notifying them that the participant did not recharge their device. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E) BI fully complies with this requirement, as detailed in the *Case Management Plan.*

(b)(4); (b)(7)(E)

Remote Access Capability. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

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Database Functions/Reports—*BI Complies with All Requirements*

The table below summarizes TotalAccess report functionality and shows our compliance with ERO's database and reporting requirements.

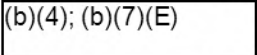| Table 28. TotalAccess Functions and Reports |
|---|
| (b)(4); (b)(7)(E) |

Advanced Analytics Engine. (b)(4); (b)(7)(E)

(b)(4); (b)(7)(E)

Appendix E—FCC Certifications

Immediately following this page, please find FCC Certifications for BI's proposed GPS devices.

BI ///////////// | **bi.com** | 6265 Gunbarrel Ave. | Suite B | Boulder, CO 80301 | **tel:** 303.218.1000
a GEO Group Company®

2022-ICLI-00039 414

TCB

TCB

**GRANT OF EQUIPMENT
AUTHORIZATION**

Certification

Issued Under the Authority of the

Federal Communications Commission

By:

Intertek Testing Services NA, Inc.
70 Codman Hill Road
Boxborough, MA 01719

Date of Grant: 07/09/2018

Application Dated: 06/24/2018

u-blox AG

Zuercherstrasse 68

Thalwil, Ch-8800

Switzerland

Attention: (b)(7)(C)   **Certification Manager**

NOT TRANSFERABLE

EQUIPMENT AUTHORIZATION is hereby issued to the named GRANTEE, and is
VALID ONLY for the equipment identified hereon for use under the Commission's Rules
and Regulations listed below.

FCC IDENTIFIER: (b)(7)(E)
Name of Grantee:
Equipment Class: PCS Licensed Transmitter
Notes: (b)(4); (b)(7)(E)
Modular Type:

Grant Notes	FCC Rule Parts	Frequency Range (MHZ)	Output Watts	Frequency Tolerance	Emission Designator
	27	(b)(4); (b)(7)(E)			
	27				
	27				
	27				
	27				
	27				
	27				
	27				
	22H				
	22H				
	22H				
	22H				
	24E				
	24E				
	24E				
	24E				
	27				
	27				
	27				
	27				

Single Modular Approval. Power output listed is conducted.

C2PC approval for portable use with respect to RF exposure compliance. Device must
operate with a maximum duty factor not exceeding that described in this filing. The duty factor
must be implemented in factory firmware. Device may only be marketed to OEM installers.

The Installers and end-users must be provided with operating conditions for satisfying RF
exposure compliance. Maximum permitted antenna gain/cable loss: (b)(7)(E)
(b)(7)(E)

**GRANT OF EQUIPMENT
AUTHORIZATION**

Certification
Issued Under the Authority of the
Federal Communications Commission
By:

Intertek Testing Services NA, Inc.
70 Codman Hill Road
Boxborough, MA 01719

Date of Grant: 07/08/2014

Application Dated: 07/08/2014

BI Incorporated
6400 Lookout Road
Boulder, CO 80301

Attention: (b)(7)(C) **Director Product Development & Strategic Plannin**

NOT TRANSFERABLE

EQUIPMENT AUTHORIZATION is hereby issued to the named GRANTEE, and is VALID
ONLY for the equipment identified hereon for use under the Commission's Rules and
Regulations listed below.

FCC IDENTIFIER: (b)(7)(E)
Name of Grantee: BI Incorporated
Equipment Class: Part 15 Security/Remote Control Transmitter
Notes: The BI LOC8 (b)(4); (b)(7)(E)
(b)(4); (b)(7)(E)

Grant Notes	FCC Rule Parts	Frequency Range (MHZ)	Output Watts	Frequency Tolerance	Emission Designator
	15.231(e)	(b)(7)(E)			

**GRANT OF EQUIPMENT
AUTHORIZATION**

Certification
Issued Under the Authority of the
Federal Communications Commission
By:

Bureau Veritas Consumer Products Services, Inc.
One Distribution Center Circle Suite #1
Littleton, MA 01460

Date of Grant: 08/12/2014

Application Dated: 08/12/2014

NOT TRANSFERABLE

MENT AUTHORIZATION is hereby issued to the named GRANTEE, and is VALID ONLY for the equipment identified hereon for use under
mission's Rules and Regulations listed below.

FCC IDENTIFIER: (b)(7)(E)
Name of Grantee: AzureWave Technologies, Inc.
Equipment Class: (b)(4); (b)(7)(E)
Notes:
Modular Type:

FCC Rule Parts	Frequency Range (MHZ)	Output Watts	Frequency Tolerance	Emission Designator
15C	(b)(7)(E)			

r Approval for mobile RF Exposure condition. The antenna(s) used for this transmitter must be installed to
om all persons and must not be co-located or operating in conjunction with any other antenna or transmitter,
multi-transmitter product guidelines. Approval is limited to OEM installation only. OEM integrators and end-
on conditions for satisfying RF exposure compliance. This grant is valid only when the device is sold to OEM
ed to ensure that the end user has no manual instructions to remove or install the device. Only those
nna(s) with equal or lesser gain may be used with this transmitter.

rantForm.cfm

1/1

TCB

Appendix F—Facilities Executive Summary

Immediately following this page, please find BI's *Facilities Executive Summary*.

ISAP IV
APPENDIX F
FACILITIES EXECUTIVE SUMMARY

IN THIS SUMMARY, BI HAS HIGHLIGHTED ISAP III
OFFICES THAT BEST EXPEMLIFY OUR ABILITY TO:

- STABILIZE PARTICIPANTS
- DELIVER EFFECTIVE CASE MANAGEMENT SERVICES
- FOSTER POSITIVE COMMUNITY RELATIONSHIPS
- SUPPORT ERO MISSION

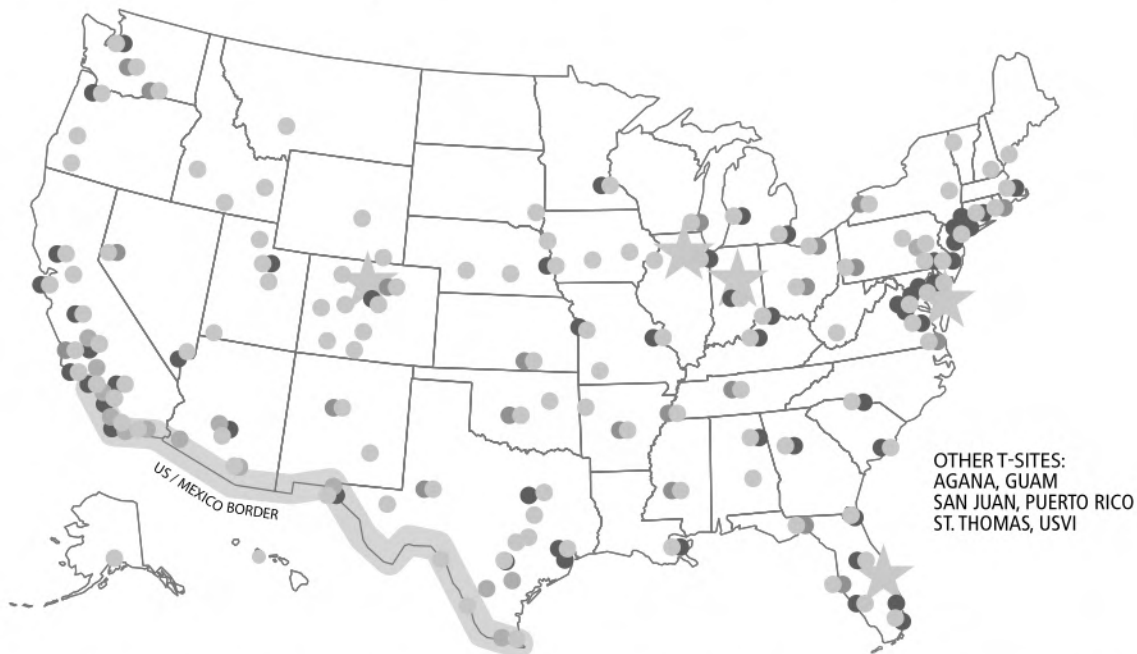**194 TOTAL SITES:** ● 14 S-SITES ● 54 C-SITES ● 21 G- SITES ● 105 T-SITES

SITE TYPE

S-SITE STAGING SITE (BORDER)
C-SITE CONTRACTOR (BI-OPERATED)
G- SITE GOVERNMENT (BI-OPERATED IN AN ERO FACILITY)
T-SITE TECHNOLOGY-ONLY (ERO-OPERATED)

69 SITES OPENED DURING ISAP III

14 S-SITES OPENED ON US BORDER

US / MEXICO BORDER

OTHER T-SITES:
AGANA, GUAM
SAN JUAN, PUERTO RICO
ST. THOMAS, USVI

★ **BI HEADQUARTERS / MANUFACTURING / ENGINEERING** | BOULDER, CO
★ **BI MONITORING OPERATIONS** | ANDERSON, IN
★ **BI MONITORING OPERATIONS / BACKUP MONITORING CENTER** | AURORA, IL

★ **GEO HEADQUARTERS / GEO CARE / IMMIGRATION SERVICES** | BOCA RATON, FL
★ **ADMINISTRATIVE OFFICE** | WASHINGTON, DC
★ **TIER 3 DATA CENTER** | NASHVILLE, TN

BI
a GEO Group Company®

SAN DIEGO

185 West F St, Suite 415, San Diego, CA 92101

5,733 SQ. FT. OFFICE SPACE

18 INDIVIDUAL OFFICES FOR CASE SPECIALISTS AND PROGRAM MANAGERS

6 MILES FROM ERO

.06 MILES FROM PUBLIC TRANSPORTATION BUS STOP AND LIGHT RAIL IN FRONT OF BUILDING

▶ ABOUT SAN DIEGO

Located close to border operations, the San Diego ISAP office incorporates a C-site and two S-sites—one of which is housed in the Brown Field Border Patrol Station. This office has provided key support for the large number of participants crossing the southern border.
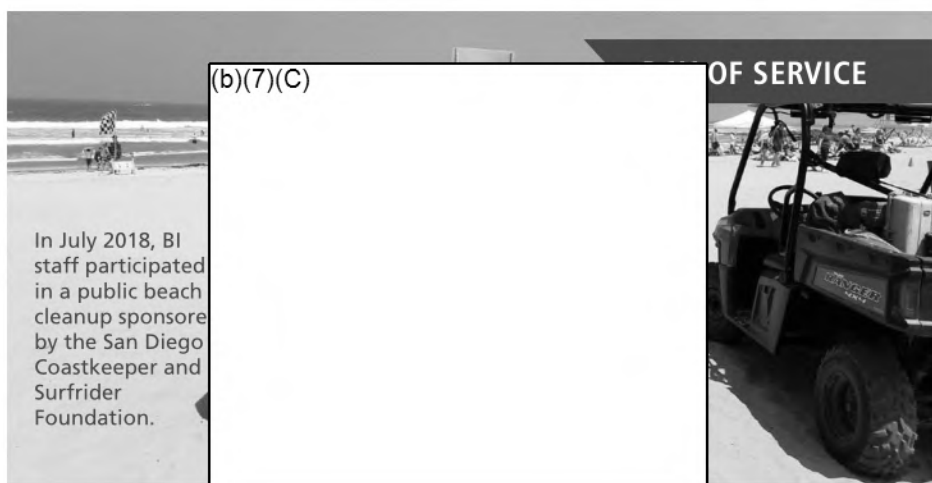
REFERRALS TO SUPPORT S-SITE PARTICIPANTS

The San Diego ISAP office partners with a variety of community organizations to provide participants with resources and referrals, including housing, food, childcare, clothing, medical and dental care, education, family counseling, substance abuse services, mental health services, and domestic violence counseling. Catholic Charities helps participants complete immigration paperwork. The Salvation Army, a key partner in supporting S-site operations, provides housing to stabilize participants.

The San Diego ISAP office opened a pilot S-site at the San Ysidro Port of Entry—the largest land border crossing in the United States and one of the busiest land crossings in the world.

In December 2018, the San Diego ISAP office received approval to expand from (b)(4) to (b)(4) participants. To address the needs of this expansion, the office moved from the (b)(7)(E) to the (b)(7)(E) which provides more office space for the hiring of additional Case Specialists. This office is equipped with private offices for up to (b)(7)(E) Case Specialists.

(b)(7)(C)

(b)(7)(E)

OF SERVICE

In July 2018, BI staff participated in a public beach cleanup sponsored by the San Diego Coastkeeper and Surfrider Foundation.

BI a GEO Group Company®

BALTIMORE

7,489 SQ. FT. OFFICE SPACE

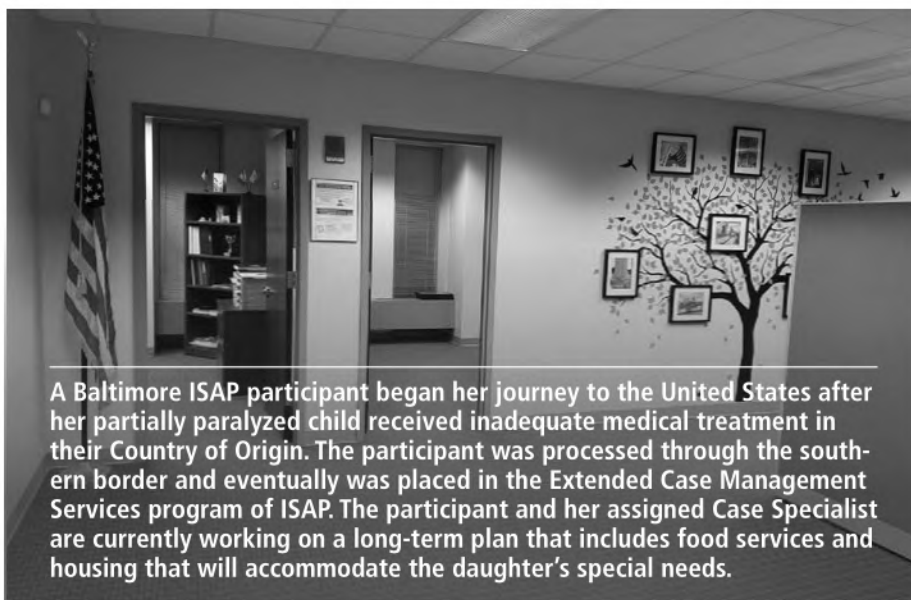**13** INDIVIDUAL OFFICES FOR CASE SPECIALISTS AND PROGRAM MANAGERS

.3 MILES FROM ERO

.1 MILES FROM PUBLIC TRANSPORTATION
CITY'S LARGEST METRO STOP

1 N. Charles Street, Suite 2000, Baltimore, MD 21201

▶ ABOUT BALTIMORE

The Baltimore ISAP office partners with local organizations to provide participants with resources and referrals within the community. The Maryland Food Bank provides ISAP participants with meals, and Bethany Christian Services provides sponsorship, foster care, family support, and pregnancy counseling for ISAP families. Bethany Christian Services assists refugees and immigrants resettling in the United States and partners with organizations in several countries to help keep families together.

(b)(7)(E)

The Baltimore ISAP office was one of the original eight ISAP offices launched in 2004 and remained in its original location until July 2018. In 2018, BI relocated this office two blocks closer to the ERO to accommodate more participants.

A Baltimore ISAP participant began her journey to the United States after her partially paralyzed child received inadequate medical treatment in their Country of Origin. The participant was processed through the southern border and eventually was placed in the Extended Case Management Services program of ISAP. The participant and her assigned Case Specialist are currently working on a long-term plan that includes food services and housing that will accommodate the daughter's special needs.

(b)(7)(E)

◣ ERO ASSISTANCE

(b)(7)(E)

BI /////////////
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SOUTH HOUSTON

7,579 SQ. FT. OFFICE SPACE

12 INDIVIDUAL OFFICES
FOR CASE SPECIALISTS
AND PROGRAM MANAGERS

21.5 MILES FROM ERO

.25 MILES FROM PUBLIC
TRANSPORTATION
.25 MILES FROM BUS STOP

450 N. Sam Houston Pkwy E, Ste 150, Houston TX 77060

▶ ABOUT HOUSTON

The South Houston ISAP office serves as a satellite office to the primary Houston ISAP location. BI opened this dynamic office in response to a rapid increase in participant numbers, allowing us to better accommodate ERO needs. Because the South Houston ISAP office is near EOIR, the Government primarily uses this office for participants that are in the Pre-Order stage of legal status.

KEY COMMUNITY CONNECTIONS

The South Houston ISAP office partners with local Houston organizations to provide participants with access to community referrals. Key community partnerships include:

- Casa El Buen Samaritano provides referrals to participants in need of medical services
- YMCA International Services, Immigration Department, provides assistance to participants needing help completing immigration paperwork
- Legacy Community Health Services provides medical and mental health services

(b)(7)(C)

(b)(7)(E)

On June 11, 2018, the South Houston ISAP office held a "Meet Your ERO Officer" event. The successful, two-hour event allowed the more than 40 participants in attendance to directly engage with ERO.

THE SOUTH HOUSTON ISAP LOCATION HOSTED THEIR FIRST KNOW YOUR RIGHTS SESSION IN AUGUST 2018.

In June 2018, South Houston ISAP staff participated in community outreach at the Houston Food Bank, which services nearly 600 hunger relief charities in 18 southeast Texas counties. BI staff prepared 15,950 meals in a single day. This positive and rewarding experience gave the staff the opportunity to give back to their community.

Confidential and Proprietary

BI ///////////
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3,850 SQ. FT. OFFICE SPACE

2 INDIVIDUAL OFFICES
FOR CASE SPECIALISTS
AND PROGRAM MANAGERS

19 MILES FROM ERO

2 MILES FROM PUBLIC
TRANSPORTATION

MANASSAS
8604 Phoenix Drive, Manassas, VA 20110

(b)(7)(E)

▶ ABOUT MANASSAS

The Manassas ISAP office opened in December 2016 as a satellite location to the Washington, DC, ISAP office, with 22% of the current active program population residing in the town of Manassas, Virginia. DHS requested that this office open to support the Government's mission and expand the ATD footprint. BI's Manassas location has a close proximity to more than 1,000 participants. Use of this satellite office reduces travel distances and costs, benefiting ICE and participants.

In June 2019, members of the Manassas ISAP office visited the Honduran Consulate in Washington D.C. to discuss how to assist participants from Honduras with obtaining official travel documentation.

(b)(7)(C)

In fall 2018, the Manassas ISAP office participated in Northern Virginia Family Services' annual Back to School Drive. The staff collected and organized backpacks and then distributed them to children in the community.

(b)(7)(C)

DAY OF SERVICE

In 2018, Manassas ISAP staff collaborated with the Washington, DC, ERO Field Office on a large operation in which more than 40 participants with final orders were prioritized for arrest. BI relayed participant GPS points, and the arrests took place in a swift, discrete manner. With the support of ISAP staff, the operation was an overwhelming success, and the arrests were made without incident. This was the largest coordinated arrest in the history of ISAP within the Washington, DC, Field Office.

BI
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3,269 SQ. FT. OFFICE SPACE

9 INDIVIDUAL OFFICES FOR CASE SPECIALISTS AND PROGRAM MANAGERS

<1 MILES FROM ERO

0 MILES FROM PUBLIC TRANSPORTATION BUS STOP AND LIGHT RAIL IN FRONT OF BUILDING

PHOENIX

2828 N Central Ave, Ste 880, Phoenix, AZ 85004

▶ ABOUT PHOENIX

The Phoenix ISAP office maintains relationships with more than 100 community organizations that provide critical participant support services, including language, medical and dental care, family counseling, childcare, education, clothing, GED support, immigration paperwork support, and housing services. The office has established several Memorandums of Understanding with local providers, including ICM Food & Clothing Bank, which provides food, clothing, and other emergency items to participants.

SUPPORTING COMMUNITY PROVIDERS

(b)(7)(C)

- In January 2019, ISAP staff volunteered at ICM Food & Clothing Bank. Staff helped build and hand out boxes of food, helped customers to and from their cars, and organized clothing donations.
- In 2018, Phoenix ISAP staff volunteered at Feed My Starving Children preparing ready-to-eat meals for children in need.

ALL PHOENIX CASE SPECIALISTS HAVE A BACHELOR'S DEGREE IN CRIMINAL JUSTICE OR RELATED FIELD AND HAVE EXPERIENCE IN LAW ENFORCEMENT AND CASE MANAGEMENT.

(b)(7)(E)

Within the past year, Phoenix ISAP staff provided TotalAccess refresher training to officers at the local ERO Field Office. ATD officers participated in a question and answer session following the presentation.

(b)(7)(E)

During the last contract year, the Phoenix ISAP office assisted with opening two new S-sites in Tucson and Yuma, Arizona. Phoenix ISAP staff provided officer training and on-site staffing assistance to the new offices, resulting in efficient operations.

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