



**AMERICAN
PSYCHOLOGICAL
ASSOCIATION**
SERVICES, INC.

February 24, 2025

Pam Bondi
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

Dear Attorney General Bondi,

On behalf of the American Psychological Association and American Psychological Association Services, Inc., I am writing to urgently bring to your attention the impact of the ongoing federal hiring freeze on psychologists working and training at the Federal Bureau of Prisons (BOP) and the ramifications of the freeze on the safety and health of correctional officers and inmates in the federal prison system. Moreover, the BOP hiring freeze hinders the ability of prosecutors to convict dangerous individuals by worsening the shortage of qualified psychologists necessary to conduct critical pre-trial assessments.

I urge you to expeditiously reverse course and provide an exemption from the federal hiring freeze for psychologists, pre-doctoral psychology interns, and post-doctoral psychology fellows seeking to work and train in the BOP and ensure they are not subject to any future federal hiring freezes. Exempting psychologists would allow BOP internship programs to fill their positions before additional upcoming match deadlines. Similar exemptions were provided to the U.S. Department of Veterans of Affairs in a timely manner, such that their ability to retain psychology interns was not impacted. It is critical that these exemptions are applied uniformly to this essential workforce within the Department of Justice.

Behavioral Health Workforce Shortages at BOP

In recent days it has come to our attention that the 20 internship sites affiliated with the BOP were unable to secure a hiring freeze exemption in time to participate in Phase I of the doctoral psychology internship match, which is a national process to help both applicants and internship programs secure internship positions of their choice, and that will advance their long-term career goals. As a result, the BOP psychology trainee programs, inclusive of approximately 83 positions, were withdrawn from Phase I of the match, forfeiting the opportunity to match with the most highly qualified candidates. It is imperative that these positions be exempt as quickly as possible to allow BOP programs to participate in subsequent phases of the national internship match this year.

Losing 83 full-time trainees is a devastating loss for each of these facilities and one that significantly endangers the health, safety, and well-being, not only of the inmates themselves but also of the dedicated law enforcement officers and other line staff reporting to correctional facilities each day.

Recent estimates show that nearly 40 percent of positions for psychologists in the BOP remain unfilled. Such shortages create dangerous gaps in behavioral health care available for federal inmates, who tend to have high need for behavioral health services, as well as delays in pre-trial assessments that delay prosecution for federal offenses. Additionally, the demanding nature of working in a correctional setting has made it difficult to recruit and retain qualified candidates for BOP psychology positions. Of further concern is that the interruption or termination of the current intern recruitment cycle will make it costly to reestablish this process in the future and will cast the positions as undesirable due to lack of certainty compared to opportunities at other internship sites.

Completion of a pre-doctoral internship is a requirement for graduation from clinical, counseling, and school psychology doctoral programs, as well as licensure to practice as a psychologist in most states, and the BOP's internship program plays a key role in the recruitment and retention of qualified and specialized psychologists for vital positions the Bureau has historically struggled to fill. The BOP and other corrections departments throughout the country are among the largest employers of psychologists and qualified mental health professionals in the public service sector.

The Role of Psychologists, Psychology Interns, and Postdocs at BOP

Psychologists working for the BOP provide essential and legally mandated mental and behavioral health services to inmates, including assessments, interventions, and treatments, as well as employee assistance interventions for staff. BOP psychologists work as part of collaborative, multidisciplinary, integrated healthcare teams, consulting with medical, custody, and unit team staff. They evaluate inmates for mental health conditions and substance use disorders; conduct psychological, educational, and suicide risk assessments; develop treatment plans and facilitate both individual and group interventions focused on a variety of needs including substance misuse, behavior modification, and/or medication; and provide 24/7 crisis interventions.

Behavioral health treatment in prison helps to reduce crime and institutional rule violations in several ways. By promoting the psychological stability of inmates, psychologists prevent violence in our nation's correctional facilities and contribute to the safety of both inmates and staff. Furthermore, as BOP's Psychology Services Branch is situated with the Reentry Services Division, the work of psychologists is crucial to the successful reentry of people released from prison into their communities, reducing recidivism, and promoting public safety. These programs help to develop prosocial and vocational skills that allow former inmates to contribute productively to society. All the above are stated goals of the bipartisan *First Step Act of 2018*, signature legislation signed into law by President Donald J. Trump during his first term.

I greatly appreciate your attention to this urgent matter and urge you to act with haste to exempt BOP psychologists, pre-doctoral psychology interns, and post-doctoral psychology fellow positions from the federal hiring freeze and ensure that they are not subject to any future federal hiring freezes or probationary terminations. If we can be of assistance, please contact me at kmcguire@apa.org or Kenneth Polishchuk, APA's Deputy Chief for Education and Training Policy, at kpolishchuk@apa.org.

Sincerely,



Katherine Brunett McGuire, MS
Chief Advocacy Officer
American Psychological Association