

Exhibit 11

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



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.

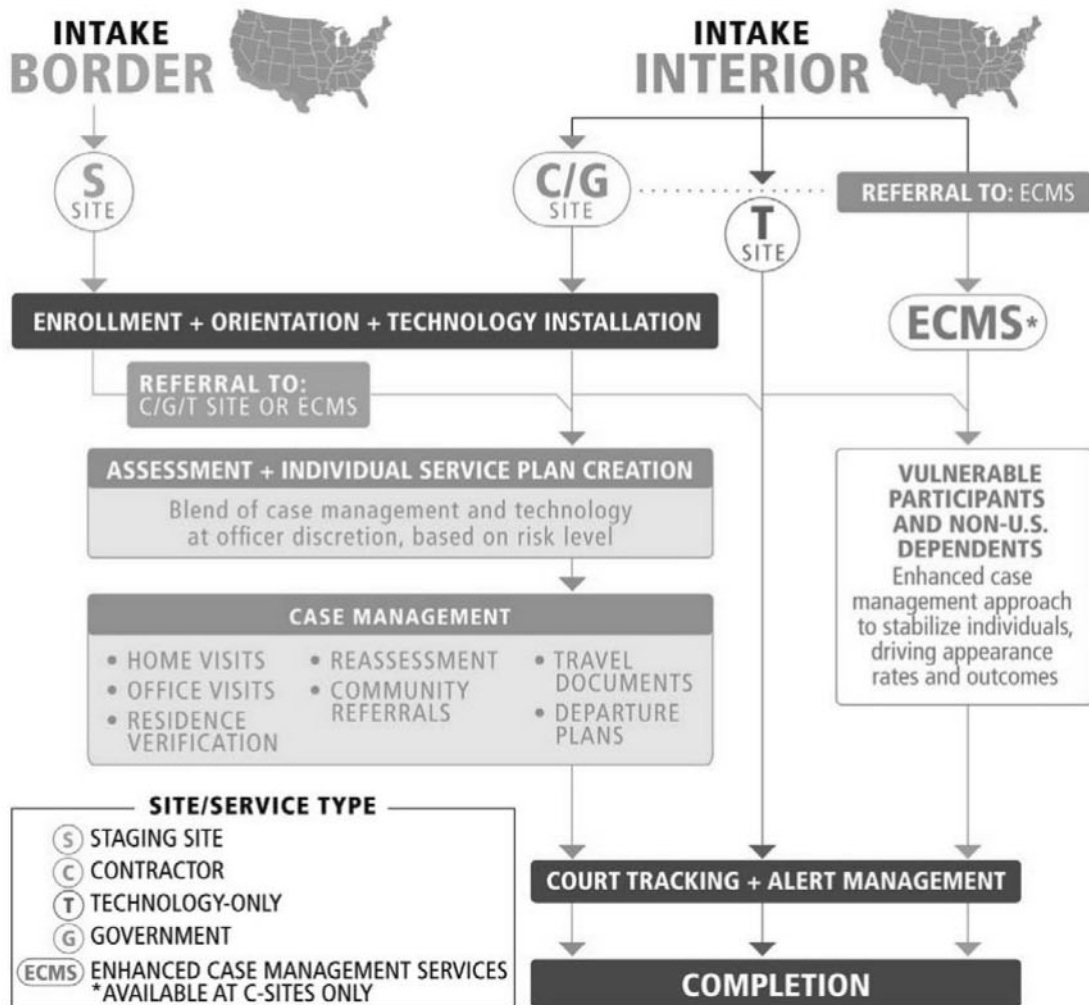


Figure 4. Overview of ISAP IV Operations

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, TotalAccess, will capture and store all information, actions, interactions, and program data from intake to departure. TotalAccess also houses electronic monitoring alerts and alert management steps, providing consolidated access to all ISAP information. To further streamline data collection, TotalAccess includes an enhanced paperless record solution, storing all records in our easy-to-access, online application. TotalAccess functionality exceeds all case management system requirements, as detailed in [Technology Plan](#) and [Appendix D](#).



Scalable, Responsive Software. As a highly scalable solution, TotalAccess can accommodate thousands of concurrent users without any service degradation. In 2018, more than 20,100 users logged into TotalAccess.

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 will provide officers and BI staff with real-time electronic monitoring, demographic, and case management information while away from the office. Enhanced for both Apple and Android operating systems, TotalAccess Mobile provides information to users in the field from a single platform. Users can request updated GPS locations; enable *Pursuit Mode*, an on-demand locate function, in compliance with *RFP Attachment 1*; upload pictures of participant residences; capture documents; make case notes; and map optimal routes for home visits.

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 allow staff to generate home visit itineraries directly from the system. The Home Visit application increases ISAP staff efficiency in the field, routing daily caseloads by analyzing proximity and travel time.

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.

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.

Activity or Document	Alert/Data		
GPS Alerts <i>LOC8</i>	Tamper (Strap, Proximity) Exclusion/Inclusion Zone	Missed Callback Restore	Low Battery Master Zone
Biometric Alerts <i>SmartLINK</i>	Bad Location	Failed Biometric Check-In	Missed Biometric Check-In
Voice Call Alerts <i>VoiceID</i>	Missed Calls Voice Failure	Late Return Calls Bad Location	Call Failed
Summary of Exception and Open Alerts Report <i>Sent weekly to AMO</i>	Total by ATD Location ATD Enrollment ID <i>Alien Number</i>	Type of Violation Total by Region	Number of Violations Total Nationwide

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. TotalAccess houses all ISAP alert procedures, and BI has developed a "copy" function that can apply universal alert management changes across the entire ISAP 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:

Push Notification Capabilities

BI also supports alert notification through "Push Notification" technology, integrated into TotalAccess Mobile. Authorized personnel have the option of using "Push Notifications" in lieu of email alerts.

- 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.

- Smartphones with TotalAccess Mobile and fingerprint scanner to verify home visits and residence verifications, collect GPS points, and document every action and observation while in the field
- Document capture capabilities in TotalAccess Mobile and SmartLINK to upload documents and pictures directly into TotalAccess
- Participant ID card and barcode scanning to verify participant identification and home visit, office visit, and residence verification activities

Program Efficiency Tools

TotalAccess includes enhanced features to improve BI staff efficiencies and verify service delivery. For instance, BI Case Specialists can generate home visit itineraries from TotalAccess that detail the most efficient travel routes.

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 provide reliable GPS tracking in all environments. The LOC8 XT is a version of the LOC8 with a non-removable battery. LOC8 GPS tracking and reporting capabilities are summarized below.

GPS TRACKING AND COMMUNICATIONS

Advanced location monitoring with multiple methods of communication to verify participant location.

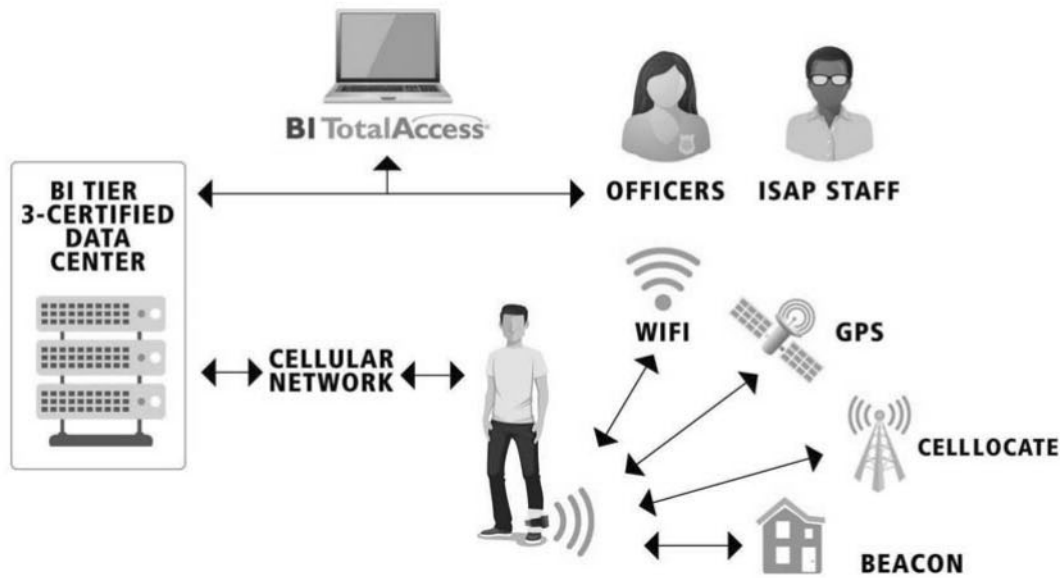


Figure 11. LOC8 Location Detection Capabilities

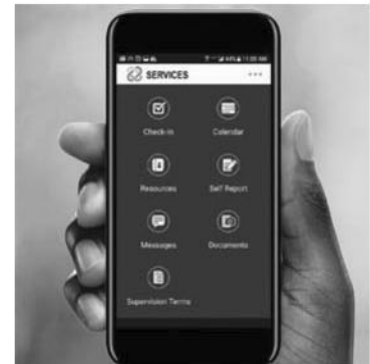
This device will provide ERO with an alternative to the LOC8 for participants who have had issues with battery compliance by offering at least 48 hours per battery charge, **exceeding** requirements. As one of the newest GPS devices available in the industry, the LOC8 is equipped with advanced features that are unavailable from any other GPS tracker. In addition to GPS jamming, strap, motion detection, and case tamper features, the LOC8 has a proximity sensor to detect if the device has been removed with no damage to the strap or casing.

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	External battery can easily be replaced by the participant and operates the device for at least 24 hours in optimal cellular coverage or while within beacon range	Fully enclosed, internal battery operates device for more than 48 hours, exceeding RFP requirements
Size	2.5 x 4 x 1.2 inches (height x width x depth)	2.5 x 4.3 x 1.6 inches (height x width x depth)
Capability	Wireless charging capability; shockproof and waterproof to 15 feet Five location detection technologies: Assisted GPS, Autonomous GPS, CellLocate, Wi-Fi, RF curfew monitoring via paired beacon Multiple built-in tamper detection features (e.g. proximity, strap, GPS jamming)	
Programmability	Multi-colored LED display; audio messages and vibration motor Able to store 150 GPS zones; variable GPS collection rates available	
Upgrade/Refresh	Over-the-air updates performed regularly without requiring interaction with device	
Maintenance	Field-replaceable, cut-to-fit strap	
Surge Capability	Surge-protected battery charger	
Range/Radius	95% of GPS points accurate to within 5 feet, 5 inches	

Biometric Reporting System: BI SmartLINK. Installed on a participant's smartphone, SmartLINK captures an image of the participant and collects a GPS point during check-in processes. TotalAccess is equipped with advanced biometric facial recognition technology to validate that the individual performing the check-in is the participant.

More than 11,000 Community Service Providers are listed in TotalAccess. 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 via the SmartLINK messages feature. 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 automatically calls participants monthly, and ERO officers or ISAP staff members can configure VoiceID to perform fixed or random calls to verify participant identity and location. Refined over 15 years of ISAP support, 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.



Figure 12. VoiceID Multilingual Capabilities

Remotely Accessible Database: TotalAccess Software Platform. TotalAccess contains BI's monitoring software application, which manages alerts and notification processes for all proposed monitoring equipment. TotalAccess includes the following features:

- Generates forms and documentation in 21 languages, **exceeding RFP** requirements. This feature will reduce the need for translation services, mitigate the risks of a participant signing a form without clear understanding, and improve overall compliance.
- Manages inventory by serial number and through detailed reports—supporting equipment levels, accurate billing, spare ratios, and identification of lost and damaged units.
- Provides customized, automated notifications to alert ERO officers and BI staff of critical situations in a timely manner, enhancing public safety and participant compliance.
- Enables authorized personnel to view, process, and close alerts; view the status and history of alerts and events; and note trends in participant behaviors and compliance.
- Facilitates report generation. BI created more than 30 new reports for ERO during ISAP III and generated more than 100 customized reports throughout the life of ISAP.
- Uses Google Maps to display participant movements and geographical information—providing the most up-to-date satellite imagery available.
- Allows authorized personnel to display GPS points, view corresponding alerts and events, request an on-demand participant location fix, and view zones.

TotalAccess Records

During ISAP III, TotalAccess housed 357,644 participant records.

- Creates custom GPS zones and monitors participant locations at all times.
- Houses all required participant information and unique Case ID fields, in accordance with *RFP Section C.6.9*. TotalAccess contains approximately 50 unique data fields—**exceeding** *RFP* requirements—to accommodate Enforce Alien Removal (*EARM*) *Case ID Numbers, ATD Enrollment IDs, ATD Service IDs, Termination Codes, and Termination Subcategories*.
- Provides alert data on active participants through TotalAccess. ERO uses this data to run a risk-factor algorithm to determine the likelihood of a participant absconding, in accordance with *RFP Section C.6.13*. This algorithm produces a Hurricane Score for each participant.

Remote Access to Monitoring System: TotalAccess Mobile. TotalAccess Mobile increases the productivity and effectiveness of officers and ISAP staff in the field. Modules in TotalAccess Mobile offer critical supervision features, including the ability to view and modify participant information and schedules, manage alerts, and locate missing equipment. *Show Clients Near Me* allows officers to view participants within a specified distance of their location, providing an investigative tool that can enhance officer safety.

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.

Our fully redundant monitoring system includes a primary infrastructure located in a Tier 3-certified data center in Nashville, Tennessee, and a backup infrastructure located in a Tier 3-certified data center in Denver, Colorado.⁶ Within this classification of data center, IT components are powered with multiple active and independent sources of power and cooling resources. Each of BI's colocation facilities has horizontal and geographic redundancy and real-time replication, maintaining synchronized data between primary and backup facilities.

With regard to horizontal redundancy, each monitoring computer system component has, at minimum, three instances handling requests. Components from top to bottom include web servers, middle-tier servers, and database servers. With regard to geographic redundancy, all data is mirrored in real time from the primary server cluster to the second backup server. If the monitoring system in Nashville became unavailable, the backup server in Denver would function as the primary server for as long as needed. As detailed in our [Transition Plan](#), BI is in the process of obtaining FedRAMP Authority to Operate (ATO) status.

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.

⁶ A Tier 3-certified data center is a location with redundant and dual-powered servers, storage, network links, and other IT components.

Wrist-Worn GPS Technology. BI continues to offer ERO the most advanced technology solutions available in the marketplace. Smaller, wrist-worn GPS solutions have recently become possible and have the added benefit of enabling communications between participants and ERO. A wrist-worn device allows ERO to use a less-conspicuous technology while retaining much of the security found in current technology. BI is currently testing multiple devices.



Data Integration Approach. BI has proactively secured a partnership with Unisys, a known and trusted Government partner, 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, BI and Unisys made great progress in developing plans to support successful integration between BI and Government-operated systems. Should ERO require integration capabilities to fulfill future ISAP IV requirements, BI and Unisys are prepared to implement integration plans rapidly and effectively.

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



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 expanded our manufacturing facility to meet production demands, developed a new ISAP IV organizational structure that includes several new positions, and refined our approach to opening new C-site locations (see Enhanced Approach to Opening New Offices). The table on the following page summarizes BI's transition preparation activities.

Proven, Custom Software

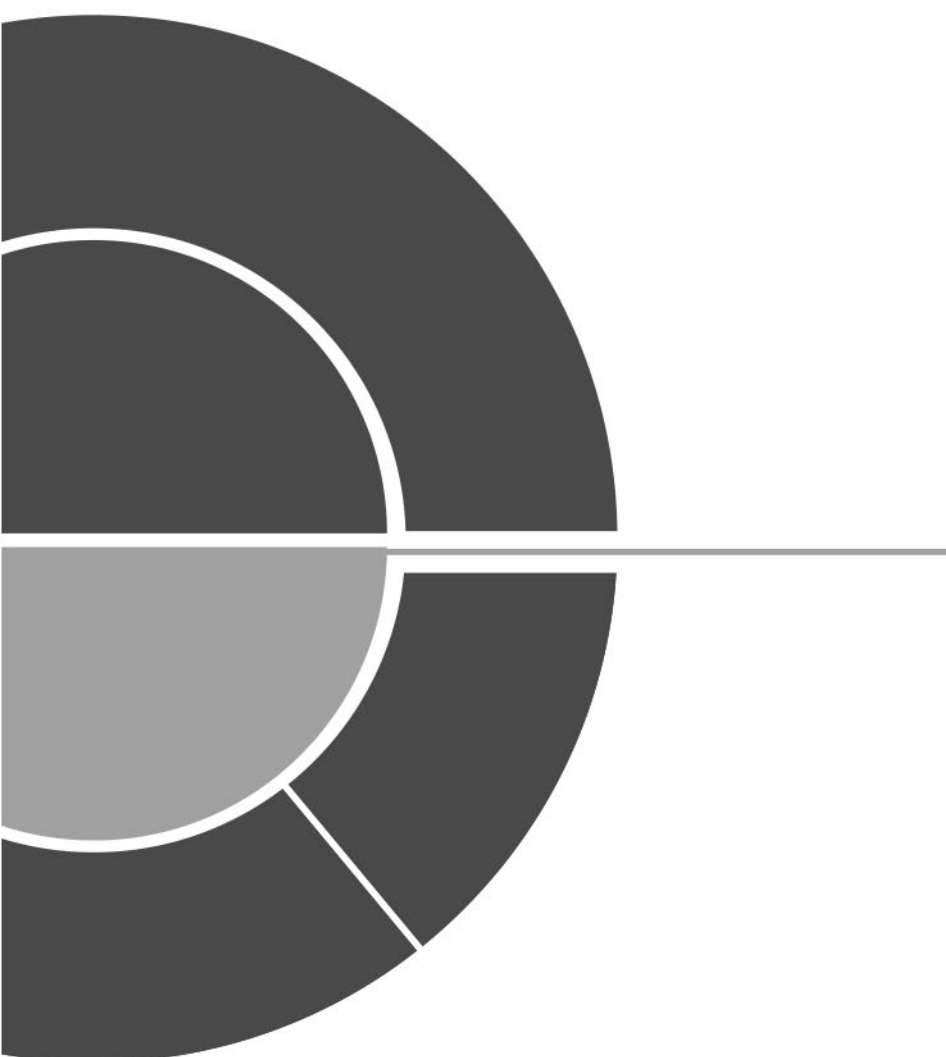
BI is the only provider that has case management software specifically customized for ISAP operations, significantly reducing the risks associated with development and testing.

PROVEN • INNOVATIVE • RESPONSIVE



ISAP IV APPENDIX C

TECHNOLOGY EXECUTIVE SUMMARY



LOC8 AND LOC8 XT

ACCURATE TRACKING IN ALL ENVIRONMENTS

Designed by BI and based on ERO's feedback, the LOC8 is manufactured at our Colorado headquarters, enabling us to continually advance its design as ISAP needs expand and evolve.

The LOC8 and LOC8 XT are durable, lightweight GPS devices worn around the participant's ankle 24/7. BI released the LOC8 in 2015 and LOC8 XT in 2018. Both models can operate and communicate continuously for a minimum of 24 hours.

ENHANCED, DURABLE LOC8 XT MODEL. New to our solution, the BI LOC8 XT has a completely internal battery for increased security, improved durability, and extended battery life, up to 60 hours.

SMALLER-FIT VERSION. BI's ISAP IV solution includes an enhanced model with a hypoallergenic small strap spacer.

PRECISE LOCATION DETECTION. The LOC8 uses multiple location detection technologies—autonomous GPS, assisted GPS, Wi-Fi, and CellLocate to accurately track participants in all environments.

EASY, CORDLESS CHARGING. Participants can easily recharge the LOC8 without connecting to an outlet, encouraging compliance and minimizing impact on the participant's daily life.

ADVANCED TAMPER DETECTION FEATURES. The LOC8 is the only GPS device with a proximity sensor that detects if the device is no longer attached to the ankle. The device also has sensors to detect motion, strap tampering, case tampering, and GPS jamming.

MULTIPLE COMMUNICATION TECHNOLOGIES. Equipped with an internal speaker, vibration motor, and LED lights, the LOC8 provides multiple ways to communicate with participants, including automated notifications of violations and on-demand messages from officers or BI staff.



LOC8 XT



LOC8



LOC8 SMALL ANKLE

2015 released newest GPS device available in the marketplace



46,463
CURRENTLY IN USE BY ISAP



59,000
TOTAL ACTIVE LOC8 UNITS
in United States



ONLY GPS DEVICE
with Wi-Fi and proximity
tamper technology



supported by
64,000
SQUARE FOOT
MANUFACTURING FACILITY



**ENTIRELY DESIGNED
AND MANUFACTURED
in the USA**

96% LOC8 components sourced
from U.S. SMALL BUSINESSES

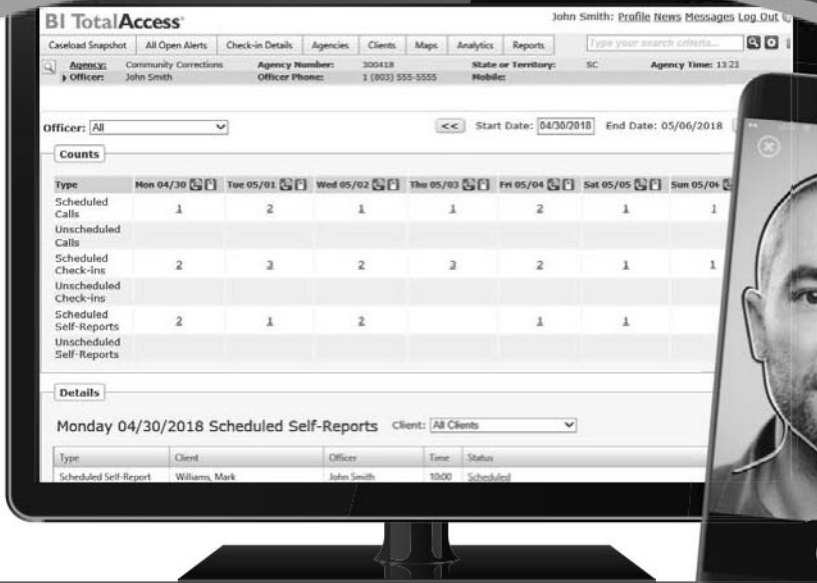
HISTORY OF GPS INNOVATION



2020-ICLI-00054 004233

CONFIDENTIAL AND PROPRIETARY





EVIDENCE OF **MONITORING SUCCESS**

SMARTLINK

MOBILE REPORTING PLATFORM

Designed with immigrant populations in mind, SmartLINK, BI's newest monitoring solution, is highly flexible, continually improving, and currently in use by the Government.

Released in 2017, BI developed the SmartLINK application to verify participant compliance and provide tools to support stabilization in the community. The application is downloaded on the participant's smartphone, and SmartLINK features are organized in modules, allowing authorized TotalAccess users to customize the components of the application that best suit supervision needs.

TOOLS TO VERIFY PARTICIPANT IDENTITY AND LOCATION. SmartLINK uses the participant's smartphone to capture an image of the individual and collect a GPS point during check-in processes. TotalAccess is equipped with advanced facial recognition technology to validate that the individual performing the check-in is the monitored participant.

EVENT REMINDERS. SmartLINK can remind participants of those events, including court appearances, case management meetings, and other appointments.

STREAMLINING PARTICIPANT COMMUNICATION. From within SmartLINK, participants and ERO officers/ISAP staff can send messages or video conference each other directly. All correspondence contains date and time-stamps, and users can review communications within TotalAccess.

ONGOING PRODUCT ENHANCEMENTS BI's agile approach to software development encourages ongoing, high-quality, rapid design, test, and implementation of new SmartLINK features. Participants will be able to view documents in SmartLINK.

 **37,700**
TOTAL MESSAGES
exchanged between
participants and officers

 **9** PRODUCT
ENHANCEMENTS
released since 2017

 **315,888**
REPORT CHECK-INS
completed by ISAP
participants

TESTIMONIAL BI RECEIVED FROM RICHMOND, VA ERO:

“ [A] Post-Order participant successfully self-departed... [ERO] used SmartLINK to confirm his departure and track the entire trip back to his country of origin, ending with him completing a self-initiated check-in at the [final destination]. The ERO team was quite happy to be able to see the use of this technology and its capabilities in action. ”

HISTORY OF PARTICIPANT MOBILE APPLICATION INNOVATION

2016	2017	2018	2019	CONTINUING INNOVATION
<ul style="list-style-type: none"> Development begins 	<ul style="list-style-type: none"> SmartLINK released with initial 5 modules (Check-in, Self-Report, Calendar, Supervision Terms, Resources) Document Capture introduced In-App Messaging introduced Progressive Annoyance introduced 	<ul style="list-style-type: none"> ISAP begins using SmartLINK Appointment with Location Verification functionality added Dynamic Self-Reporting introduced Video Conferencing Introduced 	<ul style="list-style-type: none"> Simplified Enrollment Process "My Info" module introduced 	

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EVIDENCE OF MONITORING SUCCESS

VOICEID

BIOMETRIC IDENTITY AND LOCATION VERIFICATION

BI VoiceID allows ERO to supervise a large participant population through automated outbound or inbound calls that verify the caller's identity.

BI VoiceID is a simple, automated inbound and outbound calling solution that enables authorized users to verify participant location and identity. Through TotalAccess, ERO and ISAP staff can enter schedules, listen to participant responses, and receive automated alert notification of missed calls or noncompliant activities.

INNOVATIVE VOICE VERIFICATION TECHNOLOGY. BI VoiceID verifies identity by comparing the participant's vocal patterns to the unique voiceprint enrollment. Each check-in call requires participants to repeat random number sequences, which makes it impossible for a participant to pre-record their voice for playback.

SINGLE MANAGEMENT PLATFORM. VoiceID, like all of BI's technology, is integrated with TotalAccess. This comprehensive software platform enables officers to increase or decrease monitoring and supervision levels.


AUTOMATED CALL SCHEDULING. VoiceID is highly customizable, allowing agents to select the frequency of check-in calls for each participant based on individual risk level and circumstances. VoiceID can accommodate fixed or random call schedules and automatically reschedules missed calls.

MASS NOTIFICATION CAPABILITIES. ERO can quickly notify all ISAP participants enrolled in VoiceID during an emergency.

 **99%** ACCURACY
in verifying caller identity

 **<1%** of calls require further analysis

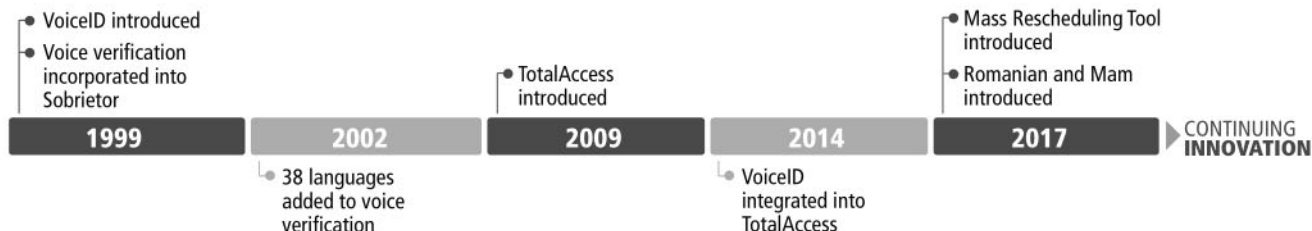
 **17,420+** CALLS
automatically rescheduled

 **VOICEID EXCEPTIONS REPORT** allows officers to verify participants have a completed voice template and check-in schedule

 **8,089,765** VOICEID CALLS
made throughout ISAP III

 **2,336,469** VOICEID CALLS
made in 2018

HISTORY OF VOICE INNOVATION





EVIDENCE OF **MONITORING SUCCESS**

TOTALACCESS

CUSTOMIZED, CONSOLIDATED SOFTWARE INTERFACE

BI has worked diligently with ERO since the inception of ISAP to provide a highly custom software solution that increases efficiencies, streamlines communications, and provides critical monitoring data to users in the field

TotalAccess is BI's powerful software that tracks all ISAP activity, including case management and electronic monitoring. TotalAccess offers efficiencies and consolidated information that are unavailable from other providers.

NEXT-GENERATION INTERFACE. BI recently upgraded the TotalAccess interface to support a modern, angular framework. This enables BI Software Developers to release new features—such as multi-lingual and integration capabilities—with increased rapidity and quality.

COMPLETE PROGRAM MANAGEMENT. TotalAccess maintains detailed and accurate records of participant progress through ISAP, from initial intake to final hearings. Storing participant information and documents and all community service providers in a single location empowers ERO officers and ISAP staff to process and monitor each case effectively.

CUSTOM, PROMPT NOTIFICATIONS. TotalAccess includes customized, automated notifications to alert ERO officers and BI staff of critical situations, enhancing public safety and driving participant compliance. Authorized personnel can view, process, and close alerts; view the status and the history of alerts and events; and note trends in participant behaviors and compliance.

ACCURATE MAPPING. Dynamic Google Maps functionality gives officers updated satellite imagery and street views. Officers can view GPS points, modify monitoring parameters, request a participant location, and create zones—all from one application.



276,474
PARTICIPANT RECORDS
housed during ISAP III



3,100
OFFICERS USING
TOTALACCESS MOBILE



30
NEW REPORTS
created during ISAP III



100
REPORTS GENERATED
over the life of ISAP



10,900+
ERO-APPROVED
service providers



CONSOLIDATED
EM and Case
Management
platform

HISTORY OF SOFTWARE INNOVATION





TOTALACCESS MOBILE

SUPPORTING IN-FIELD OPERATIONS

While developing TotalAccess Mobile, BI engaged members of ICE through surveys, forums, and in-person visits to understand the essential functions needed in the application. Using this feedback, our development team designed TotalAccess Mobile modules to fulfill the specific needs of the Government. BI demonstrated and tested TotalAccess Mobile with ERO to confirm our solution met the agency's expectation.

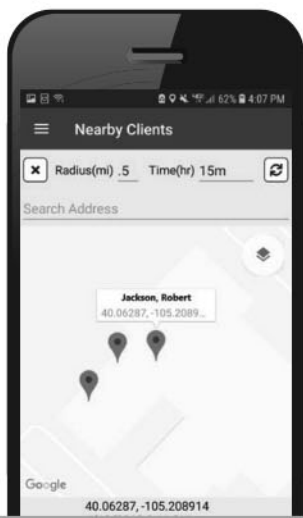
FEATURES DESIGNED TO INCREASE EFFICIENCIES. BI developed TotalAccess Mobile to increase officer and ISAP staff productivity and effectiveness while in the field. Officers can view and modify participant information and schedules, manage alerts and locate missing equipment directly from their smartphone. TotalAccess Mobile also allows officers to track and locate participants on-demand and in real time while in the field.

CONTINUAL PRODUCT ENHANCEMENTS. BI developers used industry best practices and comprehensive user testing to create TotalAccess Mobile. We developed our first mobile application for the ISAP program seven years ago. Through extensive user testing and feedback, BI launched TotalAccess Mobile for use in ISAP in 2019.



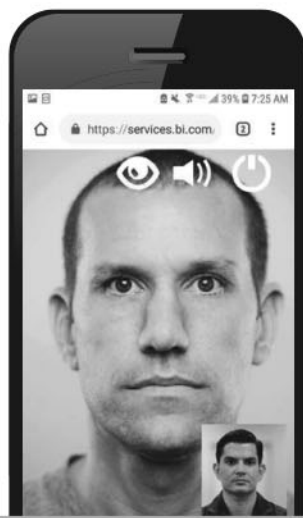
HOME VISITS MODULE

BI developed the Home Visits Module to streamline the current, manual process formerly used. TotalAccess Mobile eliminates data entry and enhances safety by displaying officer location in real time. Officers can auto-route any number of addresses to get optimal travel plan.



CLIENTS NEAR ME FEATURE

The Show Clients Near Me feature enables officers to view participants within a specified distance of their location or any address, providing an investigative tool and information that can enhance officer safety. Officers can view participants near any location.



VIDEO CONFERENCE MODULE

TotalAccess Video Conferencing Module enables officers to conduct in-person meetings with any participant at any time and from any location. The officer can also see inside the participants' residence to confirm the status of living conditions and check for signs of potential absconson.

HISTORY OF OFFICER MOBILE INNOVATION

2017	2018	2019	CONTINUING INNOVATION
<ul style="list-style-type: none"> Development begins 	<ul style="list-style-type: none"> Released to Apple and Android stores Tools and Mapping modules launched (Version 1.6) Device Setup launched Zones launched 	<ul style="list-style-type: none"> Video Conferencing, and Biometric login added Push Notifications introduced Inventory Variance, Case Notes and Equipment Inspection launched Home Visits and All Open Alerts introduced Media Management and Photo Review functionality added 	

ANALYTICS SUITE

MEASURING PERFORMANCE AND TRENDS

BI Analytics Suite takes the visualization of data to the next level of actionable reporting, transforming historical and disparate information from a variety of sources into cohesive, useful data upon which strategic decisions can be made.

BI Analytics is an enhanced feature of TotalAccess that analyzes the large amounts of data produced by GPS monitoring. The tools within Analytics allow officers to easily identify offender patterns, pinpoint risky behaviors, and focus on the highest risk individuals. In addition, BI Analytics provides powerful tools administrators can use to assess overall program health and operating efficiencies.

INCREASED EFFICIENCY AND STAFF PRODUCTIVITY. BI Analytics increases staff productivity, which allows officers to have more time to effectively manage not only high-risk participants but also their entire caseloads. For example, this enhancement provides an Absconder Analysis Report that can quickly assist officers in locating individuals who have absconded.

TREND ANALYSIS TECHNOLOGIES. BI Analytics capabilities allows the Government to easily identify areas participants frequently visit. This technology, supplemented by LOC8 Wi-Fi tracking, includes the following features:

- Visual distinguishers in TotalAccess identify the amount of time a participant remains at a location, enabling officers to determine if the individual is, for example, at a stoplight or spending a prolonged amount of time in a particular location.
- Analysis of the frequency with which a participant stops at a location enables officers to identify travel patterns and determine which locations a participant regularly visits.
- Automatic identification of the business type associated with Wi-Fi signals and categorization of locations based on risk provide valuable information for agents and officers. Through the Wi-Fi access points detected by the LOC8, BI Analytics helps officers identify high-risk areas, such as known gang locations.



15 SOFTWARE DEVELOPERS performing extensive computational, statistical, and mathematical research necessary to produce predictive outcomes

BI Analytics Absconder Analysis
August 05, 2018

Top Client Locations For Jackson, Robert (HB)
Timeframe: 2018-7-01 00:00:00 - 2018-7-31 00:00:00

Approximate Address or Intersection	Stop Time	Number of Stops	Average Stop Time	Map	Text
11700 E Auburn Dr, Aurora, IL 60013	10 days 18 hour 39 min	78	2		View Location on Google Maps by Clicking Here
2163 Inpton St, Aurora, IL 60022	3 hours 14 min	8	41		View Location on Google Maps by Clicking Here
1 Kansas Pl, Aurora, IL 60017	4 hours 7 min	7			View Location on Google Maps by Clicking Here

ABSCONDER ANALYSIS REPORT

GPS Frequency Analysis
This investigative tool can be used to identify client frequent GPS locations.

Start Time: 05/13/2019 00:00
End Time: 05/13/2019 23:59 (7 days max)
Stop Distance: 500 Feet (50 - 500)
Stop Time Threshold: 300 Minutes (10 - 500)

Arrive	Departure	Duration	Approximate Address
05/12/2019 18:24	05/12/2019 20:49	13 M, 25 min	7022 Timony Way, Ft. Worth, TX 76116
05/13/2019 14:51	05/13/2019 15:51	1 M, 0 min	1441 North Dangerois Road, Ft. Worth, TX 76104
05/13/2019 18:18	05/13/2019 18:43	27 min	1441 North Dangerois Road, Ft. Worth, TX 76107
05/13/2019 18:57			7871 Timony Way, Ft. Worth, TX 76116

GPS REPORT

Address Proximity Analysis
This investigative tool can be used to identify client activity near a specific address during a given time.

Analysis Parameters: 52
Coordinates: Lat 40.061806, Long -105.208290
Approximate Address: 6255 Gumbert Ave, Boulder, CO 80503, USA
Radius (Feet): 1000
Start Time: 02/09/2017 00:00
End Time: 02/14/2017 23:59

Included Client Types:

- Client Assigned to this Officer
- Client Assigned to this Agency
- Client Assigned to Other Agency
- Client Assigned to Other Customer

Client Matches:

Index	First Name	Last Name	Type
1	JACKSON	ROBERT	
2	TALBOT	MICHAEL	
3	WILLIAMS	TOM	
4	UNKNOWN	CLIENT	

PROXIMITY ANALYSIS REPORT



INNOVATIONS IN ISAP IV

ONGOING COMMITMENT TO SUPPORTING POSITIVE
OUTCOMES THROUGH TECHNOLOGY

SOFTWARE ENHANCEMENTS

CHECK-IN KIOSK. This application can be used at C-sites or G-sites and will be loaded on an Android tablet with an attached fingerprint reader. Participants will login to the application and update information prior to meeting with their Case Specialist—streamlining the office visit process and supporting accurate data collection.

MULTI-LINGUAL SYSTEM. New to ISAP IV, users now have the ability to change the language in TotalAccess and generate documentation in the participant's native language, supporting overall compliance.

CASE MANAGEMENT ENHANCEMENTS

HOME VISIT APPLICATION. BI staff will use TotalAccess Mobile to scan participant ID cards and fingerprints, collect a GPS point, capture photos of participant residences, and log the duration of the visit. This feature ensures staff complete services in accordance with contractual requirements and collects complete, accurate data about the home visit.

AUTOMATED COURT LINE. BI's solution includes technology that will automatically update participant information about upcoming court cases, eliminating manual processes and increasing data accuracy.

PAPERLESS RECORD SYSTEM. All ISAP IV documentation will be automated and available online with BI's enhanced virtual document technology, including collecting fingerprints from participants to be used to electronically sign all documents. Eliminating the need to print, sign, scan, and store hardcopy files increases security and record availability.

SECURITY ENHANCEMENTS

FEDRAMP AUTHORIZATION. BI's solution adheres to the most defined and extensive set of security controls in the technology industry—FedRAMP. Our in process FedRAMP authorization will be validated by a third-party assessor that grants Authority to Operate based on our adherence to more than 350 security controls. No other electronic monitoring provider maintains this level of security authorization.



In 2018, BI invested more than \$6,000,000 in researching and developing innovative technology solutions.

WRIST-WORN GPS SOLUTIONS



BI is currently evaluating wrist-worn solutions to offer a level of supervision between participant-worn GPS trackers and smartphone check-in applications.



BI recently enhanced our approach to managing our products to support more complete, product-focused concepts. This approach enables us to effectively manage market adoption, drive innovation, and release the newest, most technologically advanced solutions.

ONGOING INNOVATION AT [BI.COM](https://www.bi.com)

Appendix E—FCC Certifications

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

Exhibit 12

ISAP CONNECTIONS

A monthly report of ISAP
connections with the community

Much of ISAP's success can be attributed to the support from the many community and non-governmental partners. These organizations provide essential services such as medical, housing, education and food to ISAP participants and play an important role in achieving positive program outcomes. Identifying needs and referring program participants to supportive agencies is an integral part of ISAP – participants often have basic needs that must be met before can even think about attending court hearings and complying with orders of supervision.

This report contains updates on community liaison activity and significant events that occurred in March 2017.

SERVICES PROVIDED INCLUDE:

- | | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  LIVING ARRANGEMENTS
Family & Transitional Housing
Homeless Shelter |  MEDICAL SERVICES
Health Care Services & Clinics
Eye Care Clinic
Chronic Disease Management
Therapeutic Services
Dental Care |  EDUCATIONAL SERVICES
Tutoring & Mentoring
Early Childhood Education
Translation Services
Speech & Language Therapy
English Classes
Computer Training & Lab |  FINANCIAL SERVICES
Financial Literacy Classes |
|  TRANSPORTATION
Transportation Services
Drivers' License Assistance
Driving Classes |  LEGAL SERVICES
Legal Services & Legal Aid
Immigration Services
Petitions & Filings |  VOCATIONAL
Occupational Therapy
Job Search Assistance
Vocational Training |  MENTAL HEALTH
Anger Management Classes
Behavior Therapy
Mental Health Services
Crisis Management
Family Therapy
Counseling |
|  FAMILY DYNAMICS
Domestic Violence Classes
Parenting Classes & Skills
Family Programs
Elder Support & Counseling
Quality Childcare Assistance
After School Programs |  NUTRITION
Non-perishable Foods
Food Pantry
Emergency Food Assistance |  COMMUNITY SUPPORT
Community Outreach Services
Clothing Assistance
Gang Intervention Counseling |  SUBSTANCE ABUSE
Substance Abuse Treatment
Drug & Alcohol Abuse Classes
DUI Education |

LIVING ARRANGEMENTS REFERRALS

Richmond ISAP: During a home visit, it was discovered that a participant had no electrical power in her home, and her three children weren't enrolled in school. She was referred to a nearby church that arranged for them to stay in an "extended stay" hotel. Two of the participant's children who are old enough to attend school were successfully enrolled with the assistance of ISAP. The participant was later accepted to live full-time in the Transitions Family Shelter in Hampton, VA. She confirmed with the Senior Case Specialist that she felt comfortable with her new living arrangements, and said she and her children were happy and their needs were now being met.

LEGAL SERVICES REFERRALS

Cleveland ISAP: A participant reported to the Cleveland ISAP office and told the Case Specialist she was having difficulty locating an attorney to help her with her case. The Case Specialist provided a referral to the Immigrant Worker Project in Canton, OH which has serviced the Latino community of rural Ohio since 1999 working towards immigrant workers' rights and workplace justice. The Participant will inform ISAP once the referral had been utilized.

SIGNIFICANT EVENTS IN SUPPORT OF ICE

As participants move through the Executive Office of Immigration Review (EOIR) court process, detention is a limited and costly option. Yet DHS must track these individuals when released to community supervision. ISAP enhances this supervision and facilitates quick removals of individuals from the United States, resulting in reduced pressure on available detention beds. The focus of ISAP is to engage participants in the court process and ensure compliance to hearings and final court orders through intensive supervision and case management.

SUPPORT SERVICES INCLUDE:



Fugitive Recovery



ICE Officer Training



Compliance with Final Orders



Local Law Enforcement Support



Fugitive Prevention



Other Support Services



Travel Documents



Repatriation



FUGITIVE RECOVERY

Marlton ISAP: Marlton ISAP assisted ERO with the arrest of a final order participant for removal. An ERO officer contacted the Program Manager to escalate the supervision level of a participant they believed was not being truthful regarding the location of his wife. The ERO officer asked ISAP staff to learn if the participant's wife was with him. If so, the participant could be taken into custody and his wife could care for their child. The participant told officers he was by himself and his wife was recovering from a recent surgery. However, the Program Manager identified the participant's vehicle outside the ISAP office with another man, a woman, and a child inside. A quick discussion revealed the participant's wife was in the vehicle tending to the child. ERO was contacted, responded to the ISAP office, and took the participant into custody.

Other Examples of Fugitive Recovery

- **Ventura ISAP:** The Ventura ISAP office assisted with the apprehension of a participant with a final order. The participant was asked to report to the ISAP office and, upon arrival, Ventura ERO was notified. As a result, the participant was successfully apprehended at the ISAP office by ERO without incident and subsequently removed to Mexico.
- **Salt Lake City ISAP:** ERO asked ISAP to assist the U.S. Marshals in arresting a participant on a probation warrant. The participant was asked to report to the ISAP office at a pre-arranged date and time. Upon arrival, officers interviewed him and determined he was not the suspect. Although he was taken into custody while his identity was being confirmed, he was later released and re-enrolled in ISAP.
- **Seattle ISAP:** ERO told ISAP a participant was part of an upcoming operation that would result in his arrest for removal. The operation would occur at the participant's residence by local ICE officers. ERO requested that the Case Specialist conduct an unscheduled home visit at the participant's residence the day before the operation to verify his address. The address confirmation was relayed to local ICE officers. ERO reported that the participant was arrested as intended without incident. A termination notice was provided.
- **St. Paul ISAP:** St. Paul ISAP assisted ERO in arresting three participants. In each case, ISAP instructed the participant to report to the ISAP office at a time convenient for ERO to make an arrest.
- **San Francisco ISAP:** ERO told ISAP they wanted to take a participant into custody because of his arrest for a domestic violence incident in February. ERO requested that the Case Specialist have the participant report to their office for an interview. The Case Specialist contacted the participant and provided specific instructions on reporting to the ERO office. He reported to ERO as instructed and was taken into custody.
- **Midland ISAP:** Midland ISAP staff helped coordinate the arrest and removal of three participants who had Orders of Removal. The Case Specialist scheduled the participants to report to the ISAP office where all were apprehended by ERO without incident and successfully removed to Mexico.
- **Fresno ISAP:** A participant reported to the ISAP office after a failed home visit. The Case Specialist told ERO of the violation and ERO informed the Case Specialist the participant would be apprehended for removal due to having an Order of Removal and recently having been issued a restraining order. The participant was arrested at the ISAP office by ICE without incident and terminated as type "H", Final Order Apprehended for Removal.



FUGITIVE RECOVERY

Omaha ISAP: A participant who had previously absconded from the program reported to the ISAP office with his son and apologized for failing to communicate with his Case Specialist. ERO was notified and came to the office to speak with him, wanting to take him into custody, but unable to do so because he was the child's sole caretaker. The Program Manager spoke with him and learned he had been kicked out of the house where he was living, had nowhere to go, and wanted to be arrested so a flight back to Guatemala would be arranged for him and his son. ERO and ISAP agreed to re-enroll him in ISAP which would allow him to obtain passports for himself and his son. Once the passports have been obtained, ERO will purchase plane tickets for both to return to Guatemala.

Other Examples of Fugitive Recovery

- **San Bernardino ISAP:** San Bernardino ISAP provided GPS data to ERO for an ongoing criminal investigation related to potential robbery charges. ISAP located the participant at the scene of the alleged crimes based on GPS points. ISAP will continue working with ERO to provide all requested information, as the investigation is still ongoing.
- **Seattle ISAP:** ERO notified ISAP of receiving a temporary travel document for a participant with a charter flight arranged for his return to the Cambodia. ERO requested assistance to arrest the participant at the ISAP office for removal. The Case Specialist coordinated efforts having the participant report where he was arrested by ICE for removal without incident.
- **Jacksonville ISAP:** Jacksonville ISAP staff assisted ERO in arresting a target by using GPS data. Earlier in the morning, ERO attempted an arrest at the target's residence, but the target was not present. The target was the spouse of an ISAP participant who was due to report for an office visit that day. The Senior Case Specialist tracked the participant via GPS after the participant left the ISAP office, which eventually led ERO to the target.



REPATRIATION

Bakersfield ISAP: A participant was terminated from ISAP as type "M", Departed the United States while in proceedings. The participant departed to his home country of El Salvador without proper notification to ERO or ISAP. After a failed home visit and several contact attempts, ISAP staff made phone contact with the participant's friend who provided contact information in El Salvador. The participant was contacted and he said he departed by bus without notification, having returned to his country for immediate medical treatment. ERO was immediately notified. At the instruction of ERO, ISAP staff requested that the participant visit the U.S. consulate in El Salvador to verify his departure. He visited the consulate and sent copies of the completed departure verification forms to ISAP. The forms were forwarded to ERO who confirmed the participant's departure from the U.S.

Other Examples of Repatriation

- **Hartford ISAP:** During office visits, two participants who were granted Voluntary Departure by an Immigration Judge expressed the desire to return to their home countries as soon as possible. Each participant provided an itinerary to ISAP staff, and those were forwarded to ERO. The participants were instructed to report to ERO to pick up passports and both departed the U.S. ERO verified the departures the next day and the participants were terminated as type "L", Departure Verified (Voluntary Departure).
- **El Paso ISAP:** A participant expressed a desire to return to Mexico. ISAP staff coordinated with El Paso ERO to have her escorted to the Mexican border. Her departure was successfully verified.
- **Las Vegas ISAP:** Two participants from Romania asked about Voluntary Departure and the procedures to depart the U.S. The Senior Case Specialist reached out to the local ERO, and told the participants to purchase departure tickets. The participants reported to the ISAP office and provided departure tickets within a week. ISAP assisted ERO with scheduling a meet and greet at the airport to verify departure. Departure to Romania was verified.
- **Midland ISAP:** Midland ISAP coordinated a departure for two participants, a married couple, who expressed a desire to return to Mexico. ISAP staff coordinated with El Paso ERO to have them escorted to the Mexican border and their departures were successfully verified.

Exhibit 13

From: ERO Taskings
Subject: RCA Update
Date: Tuesday, June 06, 2017 10:50:27 AM

The following message is sent on behalf of (b)(6); (b)(7)(C) Acting Assistant Director for Field Operations:

To: Field Office Directors, Deputy Field Office Directors, and Assistant Field Office Directors

Subject: RCA Update

On June 5, 2017, Enforcement and Removal Operations (ERO) deployed an update to the Risk Classification Assessment (RCA) module within the (b)(7)(E) application suite. All recommendations provided by RCA will now be compliant with the President's Enhancing Public Safety in the Interior of the United States and Border Security and Immigration Enforcement Improvements Executive Orders issued on January 25, 2017.

Tasking Actions:

To ensure that all ERO field personnel are notified of this update, we encourage Field Office Directors (FODs) to take the following actions:

- Forward this tasking to all (b)(7)(E) RCA end users
- Encourage staff to view RCA training materials and resources available on the (b)(7)(E) (b)(7)(E) as a refresher on RCA

Please direct any questions regarding this update to (b)(7)(E) @ice.dhs.gov.

NOTICE: This communication may contain privileged or otherwise confidential information. If you are not an intended recipient or believe you have received this communication in error, please do not print, copy, retransmit, disseminate, or otherwise use this information. Please inform the sender that you received this message in error and delete the message from your system.

A161



U.S. Immigration
and Customs
Enforcement

Executive Order RCA/ATP Analysis

Prepared by: LESA

Update: 1 June 2017

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2021-ICLI-00015 621



U.S. Immigration
and Customs
Enforcement

A162

Agenda

- Analysis Process
- Updated PEP Language
- Update Recommendations
- Source of Changes
- Overview of Changes
- Complete List of Rules and Changes



U.S. Immigration
and Customs
Enforcement

Analysis Process

- ITM LESA performed a comprehensive analysis of both Risk Classification Assessment (RCA) and Automated Threat Prioritization (ATP) to determine what changes needed to be made in support of the 2017 Executive Orders. ATP is the rules engine that manages what recommendations are calculated by RCA.
- ITM LESA determined the following updates to the systems in compliance with the 2017 Executive Orders:
 1. Update the specific language in the "Risk of Flight" subsection that aligned to PEP priorities.
 2. Update the overarching recommendation from the system to better align to the priorities outlined within in the Executive Orders.

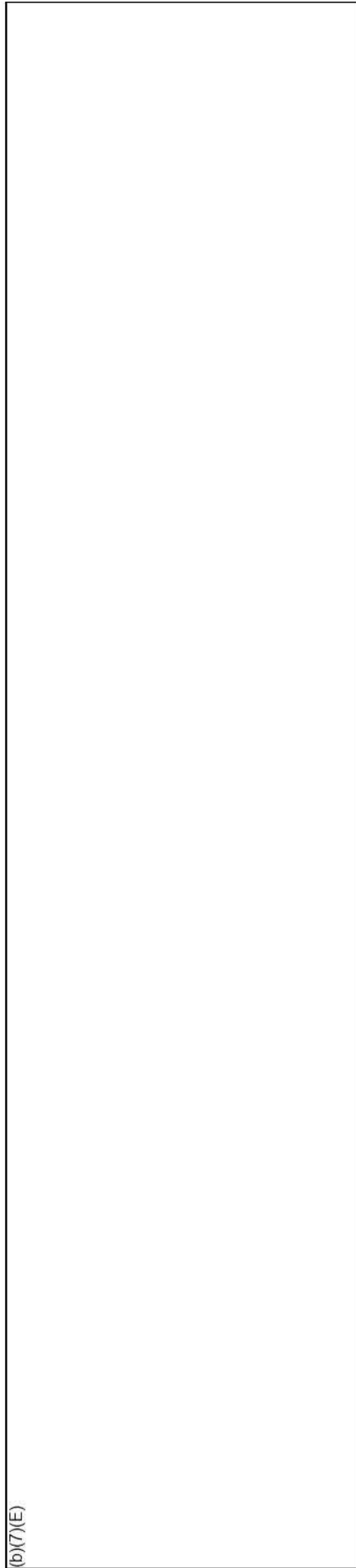


U.S. Immigration
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Enforcement

Update PEP Language ^{A164}

- The Current Immigration Violation History Question has options including “Illegal Entry before 1/1/2014 and “Illegal Entry after 1/1/2014”. As these values are specific to PEP, it is recommended that the system be amended to contain only 2 options:
 1. Lawfully entered Country
 2. Illegal/Unknown entry

(b)(7)(E)



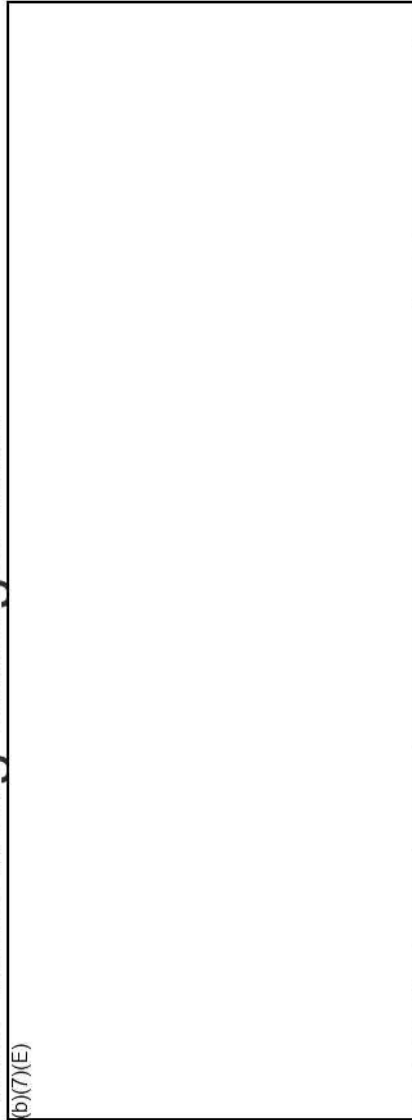


U.S. Immigration
and Customs
Enforcement

Update Recommendations

- RCA calculates a recommendation of “Detain”, “Supervisor to Determine, or “Release”, based off of the values within the following categories:

(b)(7)(E)



- RCA is simply a recommendation and does allow for the supervisor to either accept or override the recommendation.



U.S. Immigration
and Customs
Enforcement

Source of Changes

- While the entire Executive Order was evaluated for context, the most applicable sections included:
 - Enhancing Public Safety in the Interior: Section 5: Enforcement Priorities
 - Enhancing Public Safety in the Interior: Section 10: Review of Previous Immigration Actions and Policies
 - Border Security and Immigration Enforcement Improvements: Section 6: Detention for Illegal Entry



U.S. Immigration
and Customs
Enforcement

Overview of Changes

(b)(7)(E)



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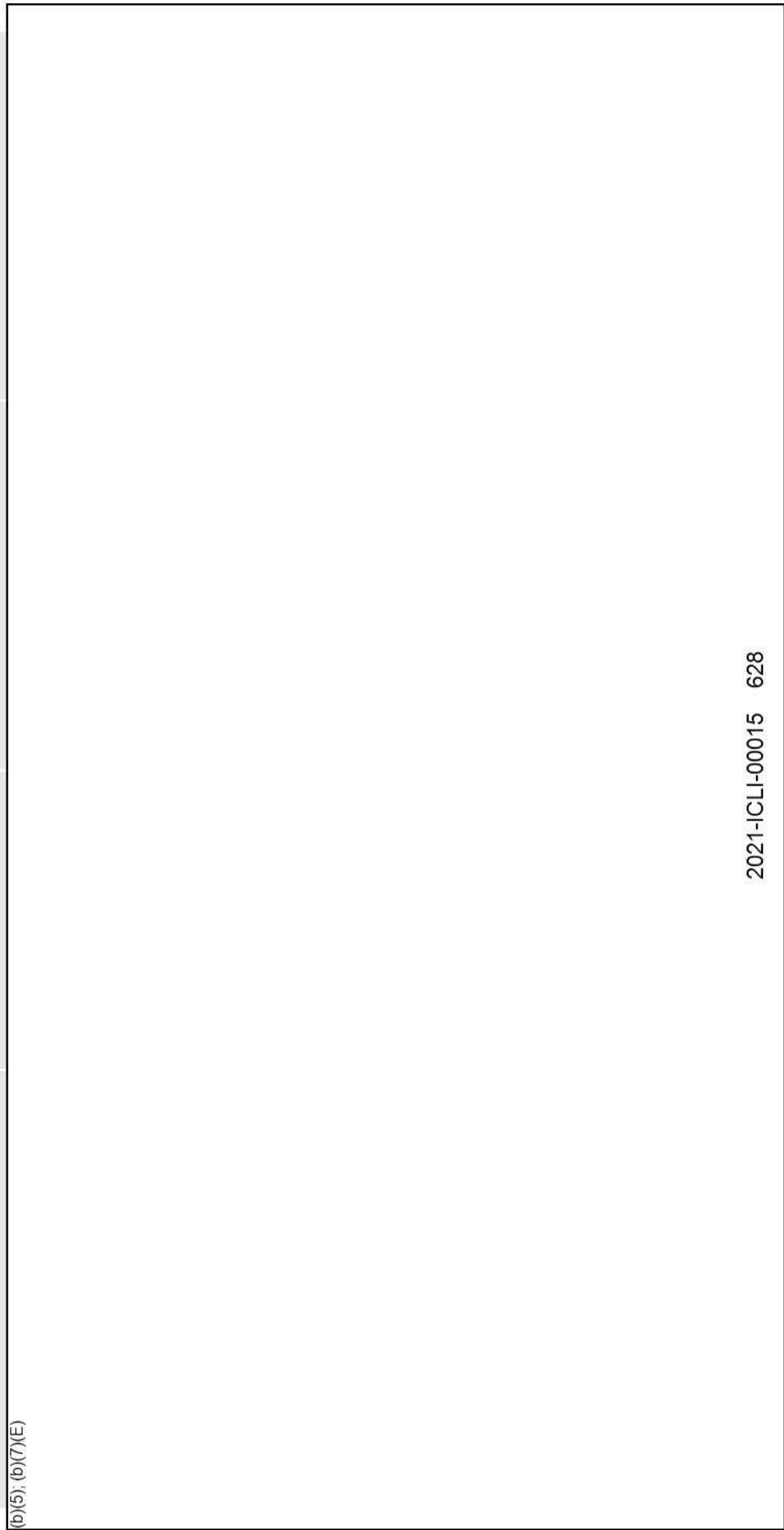
U.S. Immigration
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Enforcement



Overview of Changes

	Release	Supervisor to Determine	Detained
Current State	6	31	35
Recommended State	0	31	41

(b)(5); (b)(7)(E)





U.S. Immigration
and Customs
Enforcement

Overview of Changes

(b)(7)(E)

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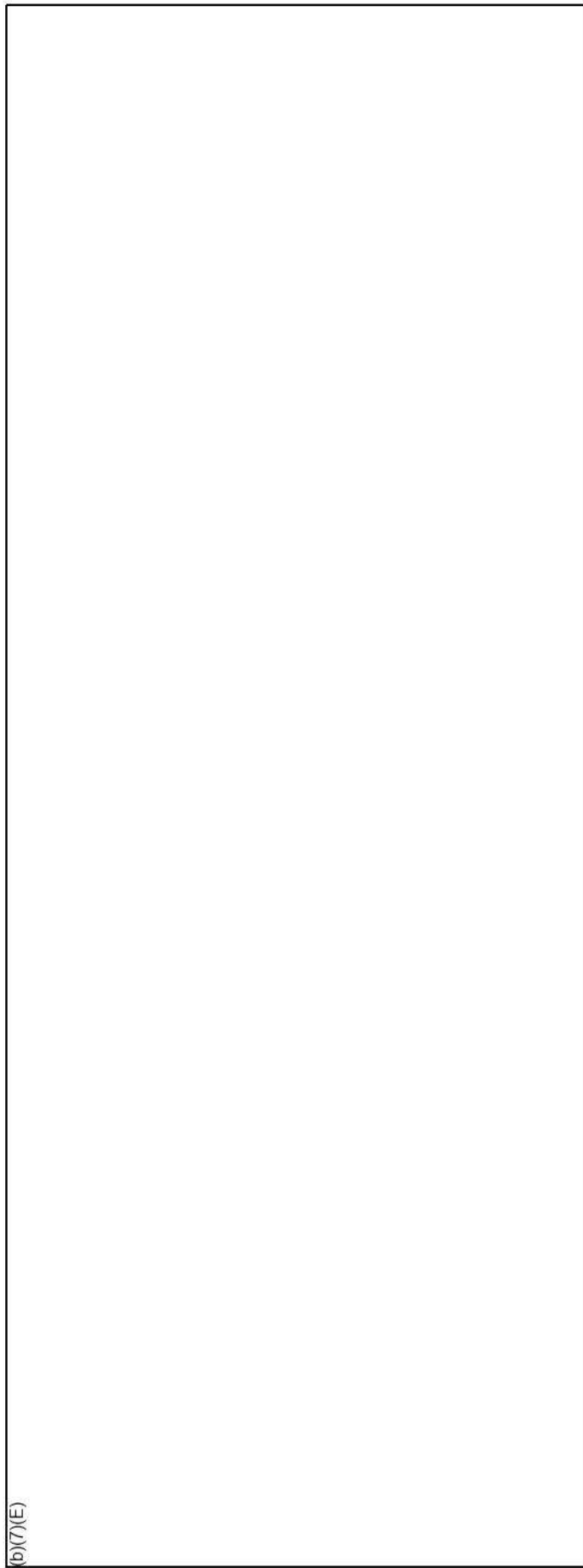
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U.S. Immigration
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Enforcement

Complete List of Rules and Changes

(b)(7)(E)



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