*Transmitted via e-mail to Gene.Johnson@vadoc.virginia.gov & U.S. Mail*

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September 6th, 2007

Gene M. Johnson, Director
Commonwealth of Virginia
Department of Corrections
P.O. Box 26963
Richmond, Virginia 23261

RE: Lawrenceville Correctional Center, Security Operations Review, August 2007

Dear Director Johnson,

Thank you for allowing The GEO Group, Inc. the opportunity to participate in the above mentioned process conducted by MGT of America, Inc. and its principal, Mr. Ken McGinnis. All recommendation enhancement efforts will be monitored, via the Lawrenceville Correctional Center Quality Assurance Plan, to ensure continued efforts are realized. In addition, this communication will be shared with all facility administrative staff to ensure the measures addressed continue to be a part of the facility standard operational procedures and practices.

Please note that we have not limited our responses to the 14 major recommendations contained in the report, but have endeavored to respond to every recommendation. Many corrective actions were implemented during the course of the review, others have been implemented since and a few remain in process.

Attached please find our responses to the recommendations reflected in the final report for your consideration.

Again, I would like to thank you for providing us with the opportunity to enhance our facility operations. Should you have any questions, comments, and/or concerns regarding our responses to the recommendation, please feel free to contact me directly.

Sincerely,

John M. Hurley
Senior Vice President, Operations
President, U.S. Corrections

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# Lawrenceville Correctional Facility
# Response and Corrective Actions
# Virginia Department of Corrections
# Security Operations Review Conducted by MGT of America, Inc.
# Dated August 2007

***Drug Testing Protocols and Results***

RECOMMENTATION: (page 7)

1. The VADOC should standardize procedures for the selection of the random drug test by generating a listing from central office of those inmates to be drug tested each month. This would eliminate any potential for a selection process that shows favoritism of any kind and also would generate a true random selection process that would permit a more accurate comparison of data from institution to institution.

RESPONSE:

1. The Lawrenceville Correctional Center acknowledges this recommendation and would comply fully with any standardized procedure presented by the VADOC.

RECOMMENDATION: (page 8)

1. The VADOC and the Contract Liaison should insure that the facility randomly tests the required five percent as required by departmental policy.

RESPONSE:

1. The Lawrenceville Correctional Center acknowledges that this process of randomly testing 5% of the inmate population was not 100% adhered to every month in 2005 and 2006. However, at present and for the remainder of 2007, 10% of the inmate population is and will continue to be randomly tested. The percentage of inmates tested will be re-evaluated in early 2008 to determine if the need still exists to exceed the minimum 5% random testing required by VADOC.

***Human Resource Data***

RECOMMENDATIONS: (page 9)

1. Lawrenceville Correctional Center should initiate some actions steps that could compensate for the present staff composition and the problems that arise from a combination of the policy and the high percentage of female security staff. This would include creating special gender

specific posts that would have primary responsibility for conducting random pat searches of inmates throughout the compound on each shift.

RESPONSE:

1. Lawrenceville Correctional Center acknowledges this recommendation and will consult with the VADOC and The GEO Group, Inc. Corporate Office for viable solutions that will not result in discriminatory employment practices. The facility was subject to an audit by the Office of Federal Contract and Compliance Programs (OFCCP) in 2005 and no findings were issued. The OFCCP commented that males were underutilized but that we hired a higher percentage of males than females, but issued no findings. Since that time the facility has concentrated on their hiring procedures without getting involved in any discriminatory practices.

RECOMMENDATION:

2. Additionally, the facility should expand the use of random searches by male supervisory staff. Although instances of supervisory staff conducting random searches was observed and documented, it was felt given the complement of staff in these positions, the number of searches should be expanded given the problems of contraband within the facility.

RESPONSE:

2. This issue was verbally communicated during the review process, the facility immediately expanded random searches conducted by male staff in supervisory positions and is committed to continuing this established practice.

RECOMMENDATION:

3. The VADOC should assess the feasibility and impact of eliminating the restriction on female officers conducting pat searches of males.

RESPONSE:

3. The Lawrenceville Correctional Center acknowledges this recommendation and would comply fully with any modified procedure presented by the VADOC as it relates to opposite gender inmate pat searches.

RECOMMENDATION: (page 9)

1. GEO should initiate steps to accelerate the hiring of correctional officers for the facility with the goal of reducing the vacancy rate of correctional officers to five to seven percent.

RESPONSE:

1. Advertising and recruiting is and has been an ongoing focus at the facility. As of the date of this response, the Lawrenceville Correctional Center has ten (10) correctional officer vacancies (this represents a current vacancy rate of only 5.9%), however, they have extended offers to sixteen (16) individuals to begin employment on September 10, 2007. Should all offered individuals report for duty on September 10th, 2007, the facility will have a surplus of six (6) staff. Hiring above the minimum required number of staff will provide a cushion between full staffing and the maximum 5 to 7 percent vacancy rate. Thus, the surplus of staff will ensure that vacancies created from failure to report to duty employees, those who determine that corrections is not a career they wish to pursue, and those that the facility determines are not suited for this type of employment are immediately filled. To achieve the surplus of employees and maintain a surplus, the facility has actively recruited via Job Fairs, the GEO web site, and advertisements (i.e., newspapers, radio, and television) and will continue these efforts. It should be noted that of a total facility staff of 341 there are only 16 vacancies or less than a 5% vacancy rate.

RECOMMENDATION:

1. GEO should conduct a formal recruitment and retention study to determine the specific reasons for the high level of turnover at Lawrenceville and to identify the measures that could be initiated to stabilize the work force.

RESPONSE:

1. In early 2007, the GEO Group, Inc. conducted an in depth company-wide employee satisfaction survey. As a result of that study the company is taking positive steps based on the results. One example of the response to the employee survey's to be implemented with the new enrollment packets in November is that the company will offer new employees health benefits within 30 days of employment rather than the previous policy of having them wait 90 days for that coverage. The results of the employee satisfaction survey are still being reviewed. The intent of this survey is to identify the reasons for employee turnover and create a benefit and/or incentive package that fosters employee retention/longevity. The Lawrenceville Correctional Center will participate in any programs and/or incentives that result from the survey (which was site specific, therefore, identifying this facility's employee views).

***Staff Turnover/Vacancy***

RECOMMENDATIONS: (page 11)

1. The VADOC should review the existing contract to determine if the required staffing levels are being appropriately maintained and if the sanctions established when staffing levels are not met are adequate to insure compliance by the vendor.

RESPONSE:

1. The Lawrenceville Correctional Center acknowledges this recommendation, and is committed to maintaining a full complement of staff. It should be noted that aggressive recruitment efforts are continuous. Not only does the contract provide disincentives for failing to staff positions, but the facility recognizes the need to cover all required security posts and does so daily. Recently the facility raised wages for several categories of employees to include correctional supervisors, unit management staff and officers.

RECOMMENDATION:

2. GEO should accelerate its efforts to fill the existing staff vacancies and eliminate the fluctuations from full-staffing to periods of high vacancy numbers in order to ensure that an adequate security work force is consistently maintain.

RESPONSE:

2. As mentioned above, the Lawrenceville Correctional Center has ten (10) total correctional officer vacancies, as of the date of this response (this represents a current vacancy rate of only 5.9%). It has extended offers to sixteen (16) individuals to begin employment on September 10, 2007. Should all offered individuals report for duty on September 10th, 2007, the facility will have a surplus of six (6) staff. Hiring above the minimum required number of staff will provide a cushion between full staffing and the maximum 5 to 7 percent vacancy rate. Thus, the surplus of staff will ensure that vacancies created from failure to report to duty employees, those who determine that corrections is not a career they wish to pursue, and those that the facility determines are not suited for this type of employment are immediately filled. To achieve the surplus of employees and maintain a surplus, the facility has actively recruited via Job Fairs and advertisements (i.e., newspapers, radio, and television) and will continue these efforts. It should be noted that of a total facility staff of 341 there are only 16 vacancies or less than a 5% vacancy rate.

RECOMMENDATION:

3. GEO should establish a semi-annual retention plan that will identify adjustments to the current hiring process that will result in a reduction in the existing staff turnover rate.

RESPONSE:

3. The GEO Group, Inc. recently conducted a company wide employee satisfaction survey with results forthcoming. The intent of the survey is to identify the reasons for employee turnover and create a benefit and/or incentive package that fosters employee retention/longevity. The Lawrenceville Correctional Center will participate in any programs and/or incentives that result from the survey (which was site specific, therefore, identifying this facilities employee views), and will review the effectiveness of the programs and/or incentives on a semi-annual basis.

***Operation of Main Entrance***

RECOMMENDATION: (PAGE 14)

1. Ensure a supervising employee of the rank of lieutenant or higher is present in the main entrance area at least thirty minutes prior to the start of every shift to provide supervision and support to staff assigned to the area, ensure compliance of all existing policies, and to improve the consistency of practices and operations of the area. Such supervisory employees should include, Warden, Assistant Wardens, the Chief of Security, Assistant Chief of Security, unit managers, captains or lieutenants. This supervision should be direct in nature and not fulfilled through remote monitoring from the Master Control.

RESPONSE:

1. This issue was verbally communicated during the review process, the facility immediately modified operational practices to mandate supervisory employees provide direct, on-location supervision and support to staff assigned to the facility entrance area, for a minimum of thirty (30) minutes prior to each shift change. Positions providing this supervision and support include: Lieutenant, Captain, Chief of Security, Unit Managers, Assistant Wardens, and the Warden. This process will continue on an on-going basis.

RECOMMENDATION:

2. Conduct periodic process and system checks of current policies utilized at the main entrance area. Such system checks would involve testing the effectiveness of the search procedures and should be used as an educational tool to improve the existing security plan.

RESPONSE:

2. The Lawrenceville Correctional Center recognizes this recommendation and is committed to performing on-going system checks. The Quality Control Program at this facility includes requirements for random reviews/checks of all compliance issues (system checks); with written reports generated that identify areas of deficiency, provide a means of corrective action development, implementation, and on-going monitoring of corrected deficiency. The facility Quality Control Program is monitored at both the Regional and Corporate levels for compliance.

RECOMMENDATION:

3. Provide additional mandatory staff to the main entrance thirty minutes prior to the start of every shift to enforce existing policies regarding entry into the institution.

RESPONSE:

3. This issue was verbally communicated during the review process, the facility immediately modified operational practices to mandate supervisory employees provide direct, on-location supervision and support to staff assigned to the facility entrance area, for a minimum of thirty (30) minutes prior to each shift change. Positions providing this supervision and support include: Lieutenant, Captain, Chief of Security, Unit Managers, Assistant Wardens, and the Warden. This process will continue on an on-going basis.

RECOMMENDATION:

4. Enforce all existing written policies that outline the requirements to gain entrance into the facility.

RESPONSE:

4. This issue was verbally communicated during the review process, the facility immediately modified operational practices to mandate supervisory employees provide direct, on-location supervision and support to staff assigned to the facility entrance area, for a minimum of thirty (30) minutes prior to each shift change. Positions providing this supervision and support include: Lieutenant, Captain, Chief of Security, Unit Managers, Assistant Wardens, and the Warden. This process will continue on an on-going basis.

RECOMMENDATION:

5. Place a surveillance camera in the main entrance area to provide remote observation and review by supervisory staff of all processing activities. The surveillance system should include recording capabilities so both GEO and VADOC monitoring staff can review the operation of the area.

RESPONSE:

5. The Lawrenceville Correctional Center acknowledges this recommendation and will identify and request the funding to purchase the surveillance camera in the 2008 Budget. Upon Budget approval, the facility will purchase and install the surveillance camera. Upon receipt of the camera, operational procedures and staff training will be developed.

RECOMMENDATION:

6. Conduct regular refresher training to all security staff on proper entry procedures and search policies and requirements.

RESPONSE:

6. This issue was verbally communicated at the time of the review, the proper entry procedures and search policies and requirements have been relayed to staff during shift briefings. In addition, new employee training and annual in-service training curriculums have been reviewed to ensure proper attention is given to this critical area of instruction.

RECOMMENDATION:

7. Review the effectiveness and enforcement of shoe removal policy.

RESPONSE:

7. The Lawrenceville Correctional Center recognizes this recommendation and is committed to performing on-going system checks. The Quality Control Program at the facility requires random reviews/checks of all compliance issues (system checks); with written reports generated that identify areas of deficiency, provide a means of corrective action development, implementation, and on-going monitoring of corrected deficiency. The effectiveness and enforcement of the shoe removal policy are included in the Quality Control Program.

RECOMMENDATION:

8. Eliminate allowance of metal detector "shuffle" or "slide" practice.

RESPONSE:

8. The Lawrenceville Correctional Center acknowledges this recommendation and immediately addressed the observation at the time of the review. All staff have been advised at staff briefings that this practice is not acceptable and any violators will be required to re-enter through the metal detector. Enforcement and oversight are being provided by supervisory level staff members on-site thirty (30) minutes prior to each shift change.

RECOMMENDATION:

9. Review national airport security procedures regarding proper entry, inspections and metal detector walk thru procedures.

RESPONSE:

9. The Lawrenceville Correctional Center acknowledges this recommendation and is currently in the process of acquiring the national airport security procedures guidelines. Upon receipt, the guidelines will be reviewed and, if necessary, modifications will be made to current policy, procedure, and practice to ensure the utilization of best practices.

RECOMMENTATION:

10. Prevent staff from remaining in the "sterile" section of the main entrance area until they comply with all entry policies including clearance through the walk thru metal detector.

RESPONSE:

10. This recommendation was verbally communicated at the time of review and the facility has erected a barrier separating searched from non-searched staff.

RECOMMENDATION:

11. Require staff and official visitors that do not clear the walk thru metal detector to be pat-down searched and screened by the hand held metal detector to identify the location of the metal content. Current inconsistent practice is to conduct a pat-down search only and not to determine or explore the cause of the alarm activation.

RESPONSE:

11. The Lawrenceville Correctional Center acknowledges this recommendation and has communicated, via staff briefings, that all staff and visitors that do not clear the walk thru metal detector are to be pat-down searched and screened with the hand held metal detector to identify the location of the metal content that created the alarm activation. This process is currently in place and will continue as a standard operational procedure. New employee and annual in-service training curriculum is under review to ensure the issue is formally addressed on an on-going basis. Supervisory staff monitoring the entry procedures will ensure this direction is carried out on a consistent basis.

RECOMMENDATION:

12. Initiate a requirement that a certain percentage of randomly selected staff entering the facility shall be subject to enhanced searches that should include a thorough pat search, removal of shoes and all outer clothing, check by a hand held metal detector, etc. These searches should be documented in a log book for review by supervisory staff.

RESPONSE:

12. The Lawrenceville Correctional Center acknowledges this recommendation and recognizes that a certain percentage of randomly selected staff entering the facility should be subject to enhanced searches that include a thorough pat search, removal of shoes and all outer clothing, check by a hand held metal detector, etc. This facility has re-communicated to all staff the operational practice of performing these searches for reasonable suspicion, and the need to document in the post log book all searches conducted of this nature. In addition, it is standard operating procedure for supervisory staff to review all log books maintained at the facility. This recommendation is currently practiced to the fullest extend allowed by GEO Corporate Policy, and will continue on an on-going basis.

***Inmate and Housing Unit Searches***

RECOMMENDATIONS: (page 17)

1. Revise the practice of having 1st shift search odd-numbered cells and 2nd shift search even-numbered cells to improve unpredictability.

RESPONSE:

1. This issue was verbally communicated at the time of the review, this practice was immediately modified to have each shift randomly select five (5) cells to search, with the results documented in the post log book and reviewed by supervisory personnel daily. The modification to operational practice was communicated via staff briefings.

RECOMMENTATION:

2. Consider additional supervisory oversight to ensure proper pat and strip-search techniques are being used.

RESPONSE:

2. This issue was verbally communicated during the review process, the facility immediately modified operational practices to mandate supervisory employees provide direct, on-location supervision and support to staff assigned the responsibility of conducting pat and strip-searches. In addition, the facility training curriculum has been reviewed to ensure that proper techniques are communicated to both new and veteran staff. Positions providing this supervision and support include: Lieutenant, Captain, Chief of Security, Unit Managers, Assistant Wardens, and the Warden. This process will continue on an on-going basis.

RECOMMENDATION:

3. Increase the number of pat-searches during mass movements and conduct the searches at both entry and exit points of major common areas including dining room, recreational areas, and educational classroom.

RESPONSE:

3. The Lawrenceville Correctional Center recognizes this recommendation and has implemented an increased number random pat-searches during mass movements, and at entry and exit points of major common areas that include the dining room, recreation areas, and education classrooms.

RECOMMENDATION:

4. Consider placing an officer to monitor inmates at the pill windows to ensure medications are ingested and not smuggled back into the housing areas.

RESPONSE:

4. This recommendation was verbally communicated during the review process, immediate action was taken to train and assign specific staff to the facility pill windows to ensure medications are ingested and not smuggled back into the housing areas. Staff assigned to the pill windows are not assigned any other responsibilities at the time of medication dispensing.

***Inmate Workers***

RECOMMENDATIONS: (page 22)

1. Encourage visitors to complete On-site Visitor Registration and Background Investigation Authorization form prior to arriving at the institution to facilitate process flow.

RESPONSE:

1. The Lawrenceville Correctional Center recognizes this recommendation and has been working closely with the VADOC to acquire access and implement procedures associated with the Visitor Tracking System, which will allow for the presentation of the completed Authorization form at the time of the initial visit. The facility provides this form to each inmate during orientation and directs the inmates to have prospective visitors complete the form prior to arriving at the facility for their initial visit. The cost of mailing the form to potential visitors is being assumed by the facility.

RECOMMENDATION:

2. Reorganize visitor processing flow to allow presentation of Registration form prior to entrance to the metal detector so that inmate visit eligibility could be immediately verified.

RESPONSE:

2. The Lawrenceville Correctional Center recognizes this recommendation and has modified and expedited visitor processing flow via Visitor Registration and VADOC Visitor Tracking. Implementation and staff training are currently on-going.

RECOMMENDATION:

3. Erect some type of barrier to deter commingling of searched and unsearched visitors in the waiting room.

RESPONSE:

3. This recommendation was communicated during the review process, immediate direction was given to have searched visitors placed in the visiting room and separated from other visitors to eliminate the potential for commingling. All staff assigned to the visiting room posts have received instruction regarding this modification.

RECOMMENDATION:

4. As visitation table assignments are currently made in a random manner, consideration could be given to initially disperse the visitors as widely as possible in the room to facilitate visibility.

RESPONSE:

4. This recommendation was communicated during the review process, immediate direction was given to have visitors assigned randomly to tables spaced apart to facilitate visibility. All staff assigned to the visiting room post have received instruction regarding this modification.

RECOMMENDATION:

5. Restrict inmate worker access to the visiting room to only those times when clean up is necessary.

RESPONSE:

5. This recommendation was communicated during the review process, immediate direction was given to all staff assigned to visiting room posts to keep all inmate workers out of the visiting room, with entry only upon visitation completion.

RECOMMENDATION:

6. Strip-search inmate workers immediately upon conclusion of their visit instead of waiting until the end of the visitation period.

RESPONSE:

6. This recommendation was communicated during the review process, the facility immediately modified its practice so that an inmate worker is no longer considered an inmate worker when he has a visit. Thus, the inmate visitation workers will follow the same procedure as all other inmates receiving visits. Staff assigned to visiting room posts have been advised of this modification to practice.

RECOMMENDATION:

7. Consider strip-searching all inmates entering the visiting room not just when exiting.

RESPONSE:

7. The Lawrenceville Correctional Center recognizes this recommendation and will collaborate with the VADOC in regard to their intent to modify their existing procedure. Should VADOC modify their existing procedure to require strip-searching of all inmates entering and exiting the visiting room, the facility will comply with the new mandate.

RECOMMENDATION:

8. Spread contact visiting tables further apart to allow officers and cameras greater visibility.

RESPONSE:

8. The Lawrenceville Correctional center recognizes this recommendation and will increase the space between tables during contact visits when visitation is of low volume. However, this recommendation can only be implemented when space permits.

RECOMMENDATION:

9. Have staff walk through the visiting room on a more frequent basis.

RESPONSE:

9. This recommendation was communicated during the review process, the facility immediately communicated during staff briefings and implemented the added responsibility of all supervisory staff and duty officers to make frequent walk through inspections of the visiting room.

RECOMMENDATION:

10. Install a computer in public entry area to automate visitor check in process.

RESPONSE:

10. The Lawrenceville Correctional Center recognizes this recommendation and did install a computer in the public entry area to automate the visitor check in process. As of the date of this response, the computer has been functional for the past two (2) weekend visitations.

RECOMMENDATION:

11. Designate one area in parking lot for visitor parking during visitation periods and require employees to park in other areas. This would restrict the area to be searched after the visitors leave but can also reduce unobserved contact between employees and their vehicles with the visitors and their vehicles.

RESPONSE:

11. The Lawrenceville Correctional Center recognizes this recommendation and will create and erect signs identifying designated parking spaces for visitors. Staff will be advised of the location for staff parking during staff briefings once the signs have been created and erected. It is anticipated that the signage will be posted by the end of September 2007.

RECOMMENDATION:

12. Immediately repair the VCR in Main Control Room to allow recording of incidents that occur in visitation room.

RESPONSE:

12. The Lawrenceville Correctional Center recognizes this recommendation and will have the VCR in the Main Control Room repaired by Friday, September 7, 2007.

RECOMMENDATION:

13. Install additional Pan-Tilt-Zoom camera(s) in the visiting room. The second camera could replace the four small stationary cameras which have limited image quality. These cameras should also be linked to a digital recorder that would permit constant recording of all the cameras in the area. A digital recording system would also permit long term storage of the recordings. This would not only be beneficial for investigative purposes but also permit the supervisory staff to review after the fact the operations of the visiting room on a regular basis to detect potential problems and security breakdowns.

RESPONSE:

13. The Lawrenceville Correctional Center acknowledges this recommendation and will request funding for the Pan-Tilt-Zoom camera(s) in the 2008 Budget. Upon Budget approval, the facility will purchase and install the equipment. Upon receipt of the equipment, the facility will develop operational procedures and address staff training needs.

RECOMMENDATION:

14. Install signage in visiting room to alert visitors and inmates to the fact they may be recorded.

RESPONSE:

14. The Lawrenceville Correctional Center acknowledges this recommendation and will post appropriate signage once equipment is purchased and ready for installation.

RECOMMENDATIONS: (page 26)

1. The institution should insure that a representative sample of those housed in the TC unit is drug tested on a monthly basis.

RESPONSE:

1. The Lawrenceville Correctional Center acknowledges this recommendation and will develop and implement a random and representative drug testing program for those inmates housed and participating in the Therapeutic Community. It is anticipated that this process will be developed and implemented prior to September 30, 2007. All staff assigned to the Therapeutic Community will receive training on the established process prior to implementation.

RECOMMENDATION:

2. The institution and VADOC should establish procedures that insure the selection of those to be randomly tested is decided outside the institution in order to insure impartiality and also insure the pool is a true random selection.

RESPONSE:

2. The Lawrenceville correctional Center acknowledges this recommendation and would comply fully with any modified procedure presented by the VADOC as it relates to a structured process for the identification of random selection inmates.

***Investigation Procedures***

RECOMMENDATION: (page 27)

1. GEO should maintain and expand the presence of drug dogs within the institution.

RESPONSE:

1. The Lawrenceville Correctional Center acknowledges this recommendation and currently has one (1) drug dog on site. On September 17, 2007, staff will be trained in the handling of drug dogs. Two (2) additional dogs have been procured and are expected to begin performing services at the facility in October 2007.

***Training: Pre-Service and In-Service***

RECOMMENDATION: (page 27)

1. Given the level of turnover at the facility it is recommended that the facility identify, train and maintain a cadre of at least 12 Field Training Officers.

RESPONSE:

2. The Lawrenceville Correctional Center acknowledges this recommendation. The facility currently has a cadre of six (6) trained Field Training Officers. The Chief of Security will identify and schedule training, via the VADOC training program, for an additional six (6) veteran staff members to serve in the capacity of Field Training Officers. The training of these officers will be accomplished by a mutually convenient schedule between the facility staff and the VADOC Training staff.

***Segregation***

RECOMMENDATION: (PAGE 30)

1. GEO should review the Sept 29, 2005 requirements and fully document and justify a security level change when it is warranted in order to provide a more immediate sanction and deterrent to inmates who test positive at this facility.

RESPONSE:

1. The Lawrenceville Correctional Center acknowledges this recommendation and has reviewed the September 29, 2005 requirements related to security level changes associated with inmates who test positive while at the facility. Unfortunately, due to space constraints, the facility is unable to use isolation as a viable sanction for inmates who test positive. The facility is currently following established protocol for inmates who test positive.

***DOC Contract Monitor***

RECOMMENDATION: (PAGE 31)

1. The VADOC should review the role and reporting structure of the contract liaison to insure that areas of non-compliance such as reflected in the failure to test five percent of the population that are reported through agency channels are accessible and immediately addressed and corrected.

RESPONSE:

1. The Lawrenceville Correctional Center acknowledges this recommendation and will work closely with the VADOC staff to ensure that areas of non-compliance are corrected in a timely, effective, and on-going manner.

RECOMMENDATION:

2. It is recommended that the VADOC consider the ramifications of requiring GEO to maintain a minimum number of male security staff. Such a discussion has possible legal implications in terms of equal protection of a protected class, equal opportunity, etc., but should be reviewed in light of the impact this situation has on the operation of the facility given the restrictions on the ability of females to search male inmates.

RESPONSE:

2. The Lawrenceville Correctional Center acknowledges this recommendation and will consult with the VADOC and The GEO Group, Inc. Corporate Office for viable solutions that will not result in discriminatory employment practices. As mentioned above, please note that the OFCCP in their review in 2005 noted that the facility hires a higher percentage of male applicants when compared to female applicants.

***Operation of the Mail Room***

RECOMMMENDATION: (page 31)

1. GEO should limit the number of staff involved in the delivery of legal mail to individual inmates in order to improve consistency and minimize the potential for staff to be compromised.

RESPONSE:

1. The Lawrenceville Correctional Center acknowledges this recommendation and will consider viable options to address the recommendation. At present, the facility utilizes counseling staff to pick up and deliver legal mail to the inmate population.

RECOMMENDATION:

2. GEO should pursue the acquisition of a package x-ray machine to permit ongoing inspection for contraband of packages, parcels, etc.

RESPONSE:

2. The Lawrenceville Correctional Center acknowledges this recommendation and will request funding to purchase an x-ray machine in the 2008 Budget. Upon Budget approval, the facility will purchase and install the equipment. Upon receipt of the equipment, the facility will develop operational procedures and address staff training needs.

***Process Observations***

RECOMMENDATION: (page 33)

1. Consider additional training and supervisory oversight of the personal property function to ensure inmates' property is examined for tampering and that all containers are thoroughly inspected.

RESPONSE:

1. The Lawrenceville Correctional Center recognizes this recommendation and has expanded and implemented safeguards to ensure that inmate property and all containers are thoroughly examined prior to entering the facility. Effective immediately following this review, the facility began prohibiting deliveries into the facility. All deliveries are received outside the perimeter and searched prior to staff transporting it into the facility. Supervisory and line staff conduct daily random searches of inmate property and the facility grounds. Prior to the implementation of prohibiting deliveries into the facility, VADOC was consulted and agreed with the corrective measure.