

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

INMATES OF OCCOQUAN, et al., :
Plaintiffs. :
v. : Civil Action No. 86-2128
(JLG)
MARION S. BARRY, JR., et al., :
Defendants. :

CONSENT MOTION TO SUBSTITUTE THE ATTACHED
CORRECTIONAL OFFICER DEPLOYMENT PLAN AND CEILING
FOR THE NUMBER OF BEDS ALLOWED IN THE LARGER DORMS

On November 20, 1997, this Court entered a Consent Order which required the Special Officer of the Court and her security expert to assemble a team of experts to assist defendants in implementing the Court's orders regarding security and personal safety. Defendants in conjunction with the team of Court experts are implementing a number of projects designed to improve security and personal safety. These projects have resulted in the need to make adjustments in the institution's deployment plan and increase the maximum number of beds in the larger dorms from 85 to 92.

1. Increase the Maximum Number of Beds in the Larger Dorms.

One of the projects which defendants have been working with the Court experts on is improving controls on visiting and decreasing inmate idleness. In order to facilitate these goals, defendants will shift the location for visiting from the gym to Dorm One. This will allow inmates to utilize the gym on Tuesday and Thursday evenings as well as on Saturdays and Sundays. Furthermore, visiting can be better controlled and observed from dorm one than the gym. To compensate for the 85 beds previously located in dorm

Inmates Occoquan v. Barry



PC-DC-003-022

one, defendants would place seven additional beds in each of the 12 remaining larger dorms (dorms 2, 3, 4, 6, 7, 8, 9, 10, 12, 13, 14 and 15). This increase would be temporary since defendants are required, on or before March 31, 1998, to reduce the maximum number of beds allowed in Occoquan dormitories to comply with the population ceiling of 1,200, which takes effect on that date.

2. New Deployment Plan

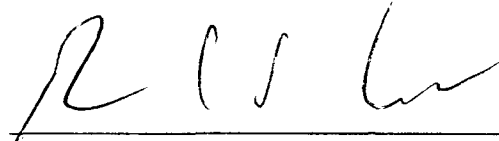
Defendants, in compliance with the Court's November 20, 1997, Order, have opened the new adjustment unit. To compensate for the opening of this new unit and to address other operational changes, such as utilizing dorm one for visiting, adjustments to the deployment plan were required.¹ These adjustments were made in consultation with the Court experts and the Special Officer.

The parties agree that these substitutions are narrowly drawn, extend no further than necessary and are the least intrusive means to correct the violations of federal rights established in the Special Officer's Report of September 29, 1997. Moreover, the substituted deployment plan and increase in the maximum number of beds allowed in the larger Occoquan dorms will not adversely impact public safety or the operation of the criminal justice system. Wherefore, the parties seek to substitute the attached deployment plan for that filed on April 19, 1996 and to increase the maximum number beds allowed in the larger Occoquan dorms.

JOHN M. FERREN
Corporation Counsel, D.C.

¹ Additional adjustments to the deployment plan will be necessary after the population is reclassified and reduced to 1,200 inmates.

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Consent Motion was mailed postage prepaid to Ayesha Khan, Esquire, National Prison Project, 1875 Connecticut Avenue, N.W., Suite 410, Washington, D.C. 20009 and Grace Lopes, Special Officer of the Court, 101 West Lombard Street, Chamber 7C, Baltimore, Maryland 21201 on this 2nd day of February, 1998.



RICHARD S. LOVE
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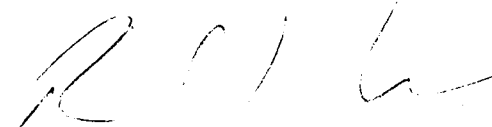
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MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF
CONSENT MOTION TO SUBSTITUTE THE ATTACHED
CORRECTIONAL OFFICER DEPLOYMENT PLAN AND CEILING
FOR THE NUMBER OF BEDS ALLOWED IN THE LARGER DORMS

1. The inherent power of the Court.
2. The Consent of the Parties and the Special Officer.

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ORDER

Upon consideration of the Consent Motion to Substitute the Attached Correctional Officer Deployment Plan and Ceiling for the Maximum Number of Beds Allowed in the Larger Occoquan Dorms, the memorandum of points and authorities filed in support thereof and the record herein, the Court finds that these substitutions are narrowly drawn, extend no further than necessary and are the least intrusive means to correct the violations of federal rights established in the Special Officer's Report of September 29, 1997. The substituted deployment plan and increase in the maximum number of beds allowed in the larger Occoquan dorms will not adversely impact public safety or the operation of the criminal justice system.

The Orders of this Court in this case are, therefore, amended to substitute the attached deployment plan for that filed with the Court on April 19, 1996, and the maximum number of beds allowed in

dorms 2, 3, 4, 6, 7, 8, 9, 10, 12, 13, 14 and 15 is increased to
92.

UNITED STATES DISTRICT JUDGE

Date

cc:

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National Prison Project
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Grace Lopes
Special Officer of the Court
101 West Lombard Street
Chambers 7C
Baltimore, Maryland 21201

Appendix A - 1 (1/88)

Post Analysis - Non-Supervisory

Occoquan Facility

Seven Day Posts

POST	First	Second	Third	Early	Late
Master Control	*1	2	2	0	0
Movement Control	1	1	1	0	0
Zone #1 Walk Gate	*1	*1	*1	0	0
Zone #2 Walk Gate	*1	*1	*1	0	0
Zone #3 Walk Gate	*1	*1	*1	0	0
Tower #1	*1	*1	*1	0	0
Tower #2	*1	*1	*1	0	0
Tower #4	*1	*1	*1	0	0
Tower #5	*1	*1	*1	0	0
Tower #6	*1	*1	*1	0	0
Tower #7	*1	0	1	0	0
Tower #8	*1	*1	*1	0	0
Tower #9	*1	0	*1	0	0
Tower #10	*1	*1	*1	0	0
Tower #11	*1	*1	*1	0	0
Two Dorm OIC	*1	*1	*1	0	0
Two Dorm #2	*1	*1	*1	0	0
Three Dorm OIC	*1	*1	*1	0	0
Three Dorm #2	*1	*1	*1	0	0
Four Dorm OIC	*1	*1	*1	0	0
Four Dorm #2	*1	*1	*1	0	0
Five Dorm OIC	*1	*1	*1	0	0
Six Dorm OIC	*1	*1	*1	0	0
Six Dorm #2	*1	*1	*1	0	0
Seven Dorm OIC	*1	*1	*1	0	0
Seven Dorm #2	*1	*1	*1	0	0
Eight Dorm OIC	*1	*1	*1	0	0
Eight Dorm #2	*1	*1	*1	0	0
Nine Dorm OIC	*1	*1	*1	0	0
Nine Dorm #2	*1	*1	*1	0	0
Ten Dorm OIC	*1	*1	*1	0	0
Ten Dorm #2	*1	*1	*1	0	0
Eleven Dorm OIC	*1	*1	*1	0	0
Eleven Dorm #2	*1	*1	*1	0	0
SMU Control	*1	*2	*2	0	0
SMU #1	*1	*1	*1	0	0
SMU #2	*1	*1	*1	0	0
SMU #3	0	*1	*1	0	0
SMU #4	0	*1	*1	0	0
SMU Recreation	0	1	0	0	0
R&D/VH	0	3	0	0	0
Adjustment Bd. Recorder/VH	0	1	0	0	0
SP 3/VH	0	1	0	0	0

Appendix A-1 (1/98) (continued)

Occoquan Facility - Non-Supervisory

Seven Day Posts

<u>POST</u>	<u>First</u>	<u>Second</u>	<u>Third</u>	<u>Early</u>	<u>Late</u>
Twelve Dorm OIC	*1	*1	*1	0	0
Twelve Dorm #2	*1	*1	*1	0	0
Thirteen Dorm OIC	*1	*1	*1	0	0
Thirteen Dorm #2	*1	*1	*1	0	0
Fourteen Dorm OIC	*1	*1	*1	0	0
Fourteen Dorm #2	*1	*1	*1	0	0
Fifteen Dorm OIC	*1	*1	*1	0	0
Fifteen Dorm #2	*1	*1	*1	0	0
Sixteen Dorm OIC	*1	*1	*1	0	0
Seventeen Dorm OIC	*1	*1	*1	0	0
Eighteen Dorm OIC	*1	*1	*1	0	0
Infirmary	*1	1	*1	0	0
Zone #3 Checkpoint	*1	*1	*1	0	0
School/Visiting Hall #1	0	1	0	0	0
Culinary Officer	0	1	1	0	0
Administration Bldg./VH #1	0	*1	1	0	0
Barber Shop/VH	0	1	0	0	0
Four A Chockpoint ++	0	1	1	0	0
Zone I Gym/VH	0	1	1	0	0
Zone III Gym/VH	0	1	1	0	0
Sanitation/VH	0	1	0	0	0
Zone #1 Sergeant	0	1	1	0	0
Zone #2 Sergeant	0	1	1	0	0
Zone #3 Sergeant	0	1	1	0	0
Chapel/Temple	0	1	1	0	0
Activity Officers **	9	9	9	0	0
Four A Tower	*1	*1	*1	0	0
Major's Aide	0	1	0	0	0
Total	62	81	73	0	0

* Indicates lunch relief required

** Duties include lunch reliefs

++ To be reassigned to other duties when post is not active

216 - 7 Day Posts x 1.88 Relief Factor = 406.08 positions

Appendix A - 2 (1/98)

Post Analysis - Non-Supervisory

Occoquan Facility

Five Day Posts

POST	First	Second	Third	Early	Late
Security Officer	0	1	0	0	0
Infirmary	0	1	0	0	0
Mail Room #1	0	1	0	0	0
Mail Room #2	0	1	0	0	0
Time and Attendance	0	3	0	0	0
Landscape	0	1	0	0	0
NIPS	0	2	0	0	0
Supply	0	2	0	0	0
R&D OIC/VH	0	0	1	0	0
R&D #1/VH	0	0	1	0	0
R&D #2/VH	0	0	1	0	0
Training Officer	0	1	0	0	0
Locksmith	0	1	0	0	0
Tower #6 Sallyport/Metal Detector ++	0	1	1	0	0
Canteen	0	1	0	0	0
Fire & Safety	0	1	0	0	0
B Building	0	1	0	0	0
Computer Operator	0	0	1	0	0
Procurement Officer	0	1	0	0	0
School	0	1	1	0	0
Administration Building	0	1	0	0	0
Security Specialist +++	0	4	0	0	0
Paint Crew Supervision	0	1	0	0	0
Inside Maintenance Supervision	0	1	0	0	0
Drug Abuse Counselor	0	2	0	0	0
Total	0	29	6	0	0

++ To be reassigned to other duties when post is not active

+++ To be used for shakedown, urine surveillance, phone monitoring, interviews, and other activities in support of the investigative lieutenant

35 - 5 Day Posts x 1.34 Relief Factor = 46.9 positions

Appendix B - 1 (1/98)

Post Analysis - Supervisory

Occoquan Facility

Seven Day Posts

POST	First	Second	Third	Early	Late
Shift Captain	1	1	1	0	0
Zone Lieutenant	3	3	3	0	0
Total	4	4	4	0	0

12 - 7 Day Posts x 1.88 Relief Factor = 22.56 positions

Appendix A - 4 (1/98)

Recapitulation of Workforce Needs - Non-Supervisory

Occoquan Facility

216 - 7 Day Posts x 1.88 Relief Factor = 406.08 positions

35 - 5 Day Posts x 1.34 Relief Factor = 46.9 positions

16 - 2 Day Posts x .54 Relief Factor = 8.64 positions

Total Positions Recommended = 461.62

Appendix A - 3 (1/98)

Post Analysis - Non-Supervisory

Occoquan Facility

Two Day Posts

<u>POST</u>	<u>First</u>	<u>Second</u>	<u>Third</u>	<u>Early</u>	<u>Late</u>
Visiting Checkpoint	0	0	3	0	0
Visiting Hall	0	3	10	0	0
Total	0	3	13	0	0

16 - 2 Day Posts x .54 Relief Factor = 8.64 positions

Appendix B - 2 (1/96)

Post Analysis - Supervisory

Occoquan Facility

Five Day Posts

<u>POST</u>	<u>First</u>	<u>Second</u>	<u>Third</u>	<u>Early</u>	<u>Late</u>
Major	0	1	0	0	0
Adjustment Board	0	1	0	0	0
Investigative Lieutenant	0	1	0	0	0
Support Services Lieutenant	0	1	0	0	0
Administrative Captain	0	1	0	0	0
SMU Supervisor	0	1	0	0	0
Total	0	6	0	0	0

6 - 5 Day Posts x 1.34 Relief Factor = 8.04 positions

Recapitulation of Workforce Needs - Supervisory

Occoquan Facility

12 - 7 Day Posts x 1.88 Relief Factor = 22.56 positions

6 - 5 Day Posts x 1.34 Relief Factor = 8.04 positions

Total Supervisory Positions Recommended = 30.6

Appendix C (1/98)

Recapitulation of Total Security Workforce Needs

Occoquan Facility

Total Non-Supervisory Positions Recommended = 401.02

Total Supervisory Positions Recommended = 30.6

Grand Total Security Positions Recommended = 431.62 or 432