

**STATE BOARD OF LOCAL AND REGIONAL JAILS**  
**COMPLIANCE PLAN – RICHMOND CITY JUSTICE CENTER**

**I. PURPOSE**

This Plan concerns violations of the State Board of Local and Regional Jail's ("BLRJ") Minimum Standards for Jails and Lockups by the Richmond City Justice Center ("RCJC") as identified during reviews of the following incidents: **Case No. 22-0060**, Date of Death November 14, 2022; **Case No. 22-0066**, Date of Death December 12, 2022; and **Case No. 23-0003**, Date of Death January 11, 2023. In each of these death reviews, the BLRJ found violations of BLRJ standard 6 VAC 15-40-1045, which regulation requires security inspections twice per hour at random intervals, documentation of all inspections and unusual incidents, and prohibition of obstructions in the bars or windows that would prevent the ability of staff to view inmates or the entire housing area. These violations and this Plan were discussed at the BLRJ's meetings on July 26, 2023, September 20, 2023, and October 18, 2023. The BLRJ abstained from making any determination of a causal connection between any of these violations and the deaths. *This Plan supersedes and replaces in entirety the Plan previously drafted and signed by the BLRJ and tendered unto RCJC on July 28, 2023.*

**II. COMMENCEMENT AND DURATION**

This Plan commences the date it is signed by the Chairman and the Executive Director. While the Executive Director will immediately transmit the Plan to RCJC, the Plan commences immediately whether or not RCJC agrees to or acknowledges the Plan. The term of this Plan will be no less than two years. At the two-year point, the BLRJ may find RCJC to have demonstrated consistent compliance with this Plan and vote to remove RCJC from the Plan, or the BLRJ may vote to extend the duration of the Plan.

**III. PROCEDURAL REQUIREMENTS**

RCJC will take the following actions to address the violations:

**A. CORRECTIVE ACTION PLAN**

Within 10 working days of receipt of this Compliance Plan, RCJC will provide the BLRJ with a detailed plan of action ("POA") for the standard violations identified in paragraph (A) above. This POA shall include the RCJC's identification of the causes underlying the violations, the necessary remedial steps, a timeline for the remediation, and a plan for subsequent internal monitoring of this standard. Following the receipt of the POA, the BLRJ may or may not add an addendum to this Compliance Plan to address the causes identified for these violations.

## **B. AUTOMATED SECURITY ROUNDS SYTEM**

Within five months of the initiation of the Compliance Plan, RCJC staff will be *expected* to use an automated system to record and document security rounds. This is described as an "expectation," because the BLRJ recognizes that various aspects of the procurement, installation, and implementation of such a system are beyond the control of RCJC. RCJC will, however, exercise good faith and due diligence in obtaining and implementing such a system as soon as is practicable. If RCJC is for any reason unable to obtain and implement such a system within six months of the initiation of this Compliance Plan, then RCJC will provide the BLRJ with weekly updates on the status of this initiative.

## **C. STAFF MONITORING OF SECURITY ROUNDS**

1. A command level staff member will review the system-generated reports daily.
2. When a missed round is discovered, immediate action will be taken to ensure the inmates affected by the missed round are safe and secure, and this must be reported to the Sheriff.
3. RCJC will address missed rounds immediately with the officer who failed to make the required check and the supervisor in charge of that officer.
4. If a procedural or technical problem is identified, the Sheriff will ensure that the issue is corrected immediately or as soon as practicable.
5. If a policy violation, neglect of duty, or similar problem is identified, officers will be disciplined according to RCJC's adopted disciplinary procedures, and this will be included in the monthly summary report referenced in section III.D.3. below.

## **D. INTERNAL AUDIT PROCEDURES**

RCJC will designate a command level staff position (the "Standards Compliance Officer" or "SCO") with a rank of administrative captain or higher to be responsible for leading RCJC's ongoing effort to ensure compliance with this Plan and, more generally, with the Standards of the BLRJ.

1. At the beginning of each week the SCO will obtain copies of relevant documentation and conduct interviews with each applicable post supervisor, as necessary, to measure compliance with the Standards for the previous week. Documentation to be reviewed will include but not be limited to all daily security rounds reports and any other records deemed necessary by the SCO to measure Standards compliance. The SCO may also review video footage to ensure compliance with twice per hour checks.
2. All potential Standards violations found by the SCO must be immediately reported through the appropriate chain of command and directly discussed with

the supervisors in charge of that area for immediate corrective action, which will be documented and maintained by RCJC. Standards violations will be reported to the BLRJ within 72 hours of their discovery.

3. At the end of each week, the SCO will prepare a summary report of all the weekly findings and any corrective actions taken and submit it to the Sheriff.
4. The SCO will meet with the Sheriff or designee on a weekly basis to discuss the findings. Documentation of the meetings will be attached to the weekly summary reports.
5. At the end of each month, all weekly summary reports will be compiled into a monthly summary report, which RCJC will provide to the BLRJ. Copies of the weekly summary reports will be attached to the monthly summary report. The monthly reports will clearly indicate all discrepancies or potential Standards violations, as well as the specific corrective actions taken. The monthly summary report will be submitted to the BLRJ no later than the 7<sup>th</sup> day of the month following the period covered by the summary.
6. Any RCJC policies, post orders, or procedures modified as a result of this Plan will be provided to the BLRJ with the first monthly summary report. Future revisions will also be provided to the BLRJ.

#### **E. OFFICER TRAINING**

1. All RCJC sworn officers will receive training on the penalty for forging public records (*Code of Virginia* §18.2-168).
2. All training will be completed within 90 days of the initiation of this Compliance Plan.
3. Documentation of the training, including staff sign-in sheets, will be provided to BLRJ within 7 days of completion of the training.

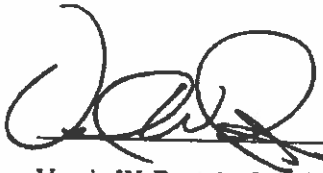
#### **IV. ADDITIONAL CONDITIONS AND REQUIREMENTS**

##### **A. FURTHER VIOLATIONS AND MONITORING**

BLRJ does not relinquish any authority to address further violations should noncompliance with any other Standards be an issue in the future. BLRJ staff may perform on-site monitoring visits as directed by the BLRJ Chair.

**B. COOPERATION WITH MONITORING, INSPECTIONS AND DEATH INVESTIGATIONS**

During and in the course of any and all monitoring visits, inspections, and/or death investigations conducted by the BLRJ during the period of this Compliance Plan, RCJC will fully cooperate and comply with the letter and spirit of any and all requests for documentation or other information within the possession or control of RCJC. Specifically, within seven calendar days of receipt of a request or demand from any duly appointed officer, agent or investigator of the BLRJ, RCJC will a) provide all such documentation or information as requested or demanded or b) provide an interim response including a request for an extension and the reason(s) therefore. If RCJC requests an extension, the Chairman of the BLRJ shall exercise sole discretion in granting or denying the request.

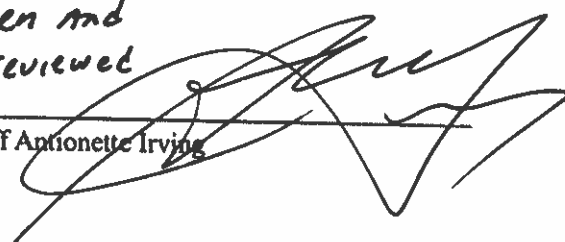
  
Vernie W. Francis, Jr., Chairman, BLRJ

11-15-23  
Date

  
Geoff Garner, Executive Director, BLRJ

11/15/23  
Date

Received and acknowledged by RCJC:

*Seen and reviewed*  
  
Sheriff Antionette Irving

11/15/2023  
Date