

STATE OF LOUISIANA

OFFICE OF STATE INSPECTOR GENERAL



LOUISIANA WORKFORCE

Date Released:

December 6, 2010

File No. CID-11-009

STATE OF LOUISIANA

OFFICE OF
STATE INSPECTOR GENERAL



LOUISIANA WORKFORCE

Stephen B. Street, Jr.
State Inspector General

A handwritten signature in blue ink, appearing to be "BJ", written over a horizontal line.

Endorsed by:
Governor Bobby Jindal

November 23, 2010

File No. CID-11-009

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BOBBY JINDAL
GOVERNOR

STEPHEN B. STREET, JR.
STATE INSPECTOR GENERAL

State of Louisiana
Office of the Governor
Office of State Inspector General

November 23, 2010

Honorable Bobby Jindal
Governor of the State of Louisiana
P.O. Box 94004
Baton Rouge, LA 70804-9004

Re: Case No. CID-11-009

Dear Governor Jindal:

This report addresses concerns raised about forged documents that employees of Louisiana Workforce created to favorably pass an audit performed by Department of Corrections (DOC) auditors. The report includes one recommendation that DOC perform a full audit on the Louisiana Workforce facility to ensure compliance with state requirements for work release facilities.

The report also includes recommendations that DOC revise the Employer's Work Release Agreement form to provide more clarity and that Louisiana Workforce retain original, signed copies of the forms in its files.

We provided drafts of the report to DOC and to management and affected employees of Louisiana Workforce. Their written response is included as Appendix A.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen B. Street, Jr.", written over a circular stamp.

Stephen B. Street, Jr.
State Inspector General

SBS/rsd

Enclosure

Executive Summary

The Office of Inspector General received credible information that certain employees of Louisiana Workforce, LLC forged Employer's Work Release Agreements, which are required by the Department of Corrections (DOC) when state inmates participate in privately managed work release programs. The forms were altered in advance of a DOC site audit scheduled for August 12, 2010. The DOC audit found that Louisiana Workforce was in full compliance with DOC standards.

Based upon information in the original complaint, OIG investigators obtained a search warrant for the Louisiana Workforce location at the East Baton Rouge Parish Prison and seized all inmate and employer files. An extensive review of the Employer's Work Release Agreement forms revealed that approximately 68 documents appear to have been altered. Louisiana Workforce Assistant Warden Reggie Felker admitted in an interview that he altered at least 26 of the documents to make them appear to be authentic so that they would pass inspection by the DOC auditors.

Edward Boeker, warden of Louisiana Workforce's East Baton Rouge location, supervises Mr. Felker. Mr. Boeker admitted that he directed Mr. Felker to create new documents to prevent Louisiana Workforce from receiving an unfavorable audit from the Department of Corrections. He also admitted that he was present at the Louisiana Workforce facility and aware that the missing documents were being created. Mr. Felker stated that he altered the documents at the direction of Mr. Boeker after they determined that there was insufficient time to obtain legitimate signatures on the required forms.

The ultimate consequence of failing to comply with DOC standards is the removal of state inmates from the work release program. Such a move would have a direct financial impact on a company like Louisiana Workforce administering the program.

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Background

The Louisiana Department of Corrections contracts with parish sheriffs' offices to operate work release facilities using state inmates under the authority of DOC. In turn, some sheriffs' offices contract with private companies to operate the work release facility on their behalf. Louisiana Workforce, LLC is one such company, operating work release facilities in East Baton Rouge, West Feliciana, Pointe Coupee, and Terrebonne Parishes. These facilities are subject to rules and regulations set forth by the Louisiana Department of Corrections and subject to annual audits.

Scope and Methodology

We conducted our investigation in accordance with Principles and Standards for Offices of Inspector General as promulgated by the Association of Inspectors General.

This investigation began after our office received a complaint that employees of Louisiana Workforce, LLC forged Employer's Work Release Agreements. The scope of the investigation was limited to Employer's Work Release Agreements in recent offender and employer files. The investigation consisted of reviewing all Employer's Work Release Agreements to identify suspected forgeries and removing those documents from the files. The investigation also consisted of interviewing members of the Louisiana Workforce administrative staff assigned to the East Baton Rouge Parish facility.

Forgery of Employer Work Agreement Forms

The Louisiana Department of Corrections Standard Operation Procedure 12-2 requires that work release facilities maintain a signed copy of the Employer's Work Release Agreement form for each work release inmate. The purpose of the form is to ensure that employers understand the rules as dictated by DOC.

According to James Bueche, Deputy Assistant Secretary at DOC, the Employer's Work Release Agreement form is taken very seriously and used to ensure that both inmates and employers know what is expected of them. A signed form prevents employers from claiming that they were unaware of the rules pertaining to behavior expected of and around inmates. Violations of these rules could result in denial of an employer's privilege to use work release inmates. According to Mr. Bueche, DOC normally allows work release companies a certain amount of time to correct deficient audit findings. However, non-compliance with DOC rules by work release companies could ultimately result in the removal of DOC inmates from the work release program. The rules listed on the DOC Standard Operating Procedure form 12-2, Employer's Work Release Agreement, are as follows:

1. "Any Department of Public Safety and Corrections offenders in my employ will be covered by my insurance, and/or worker's compensation insurance as required by law, including vehicle insurance when being transported to and from the job.
2. The offender will be withdrawn from employment in the event of a strike.
3. The consumption of alcoholic beverages or illegal drugs by the offender is prohibited. If I have knowledge or suspicion that the offender is using either of these substances, I will immediately notify the work release facility.
4. The offender must report immediately to and return directly from work each day. The offender must be transported directly to the work site or released directly to the employer or his representative. No offender is to be released at a pick-up point to wait for his employer or his representative to pick him up. At no time is an employer to have an offender unsupervised, including the transportation process to or from the employment location. The offender must be under supervision at all times. I will immediately report any known violations to the work release facility.
5. I understand and agree that staff members from the work release facility or the Department of Public Safety and Corrections may visit the offender's work location at any time.
6. I agree to keep the offender under supervision at all times by a designated employee representative, preferably a supervisor. I agree to keep the work release facility advised of the offenders' whereabouts and to report any problems to them.
7. The offender will not be a member of any union.

-
8. Any income assignment order/notice received from the Department of Social Services will be forwarded the work release facility where the offender is housed.
 9. The offender is not an immediate family member of any staff member of the company by which offender is employed.
 10. Any sexual activity or relations or attempted sexual activity or relations between a civilian and an offender are expressly forbidden. Any such actions will be immediately reported to the work release facility.”

The Louisiana Department of Corrections scheduled an audit of Louisiana Workforce’s East Baton Rouge location on August 12, 2010. Assistant Warden Reggie Felker stated that the facility was unprepared for the audit during the days preceding the audit, which required the administrative staff to work the weekend before the audit. According to Mr. Felker, files were missing Employer’s Work Release Agreement forms, criminal histories, and inmate authorization forms. Non-administrative issues also had to be addressed prior to the auditors’ arrival.

Emily Guy, a secretary for Louisiana Workforce, stated that she reviewed all the inmate files and compiled a list that detailed the documents missing from the files. When she completed the list at the end of the day on August 7, she gave it to either Mr. Felker or Mr. Boeker. When she returned to work on August 9, she learned that all the missing Employer’s Work Release Agreement forms had been signed and placed in the files. She stated that she did not know how the forms had been signed so quickly. She also stated that no one in her office explicitly told her that they had been forged. According to Ms. Guy, she did not question anything, but should have known that something inappropriate was done.

Also on August 9, Louisiana Workforce Assistant Warden Robert Norman stated to Brittany Powers, another Louisiana Workforce employee, that Mr. Felker had really come through for the company and “saved the day” by making the company ready for the audit. Mr. Norman did not explain what he specifically meant but stated to us that he was complimenting Mr. Felker for “being there” to help with audit preparations.

Mr. Norman further stated to us that he saw no one forging documents with his “own eyes.” However, he knew that something abnormal occurred over the weekend because there was no way that all the missing forms could have been legitimately signed between the time he left work on Saturday evening and when he returned Monday morning. Mr. Norman also stated that most of the employers’ businesses are closed on weekends, which would make it impossible to contact them to have a form signed.

According to Mr. Felker, he and Mr. Boeker realized that they did not have enough time to obtain legitimate signatures on the missing forms before the auditors arrived. Therefore, at the orders of Mr. Boeker to “get it done,” Mr. Felker altered Employer’s Work Release Agreements by affixing copies of employer signatures onto the forms to satisfy DOC requirements. Mr. Boeker suggested to Mr. Felker that he prepare for the audit like they had done to prepare for American Correctional Association audits when they worked for DOC

in the past, which is to create documents and place them in the files from where they are missing. Mr. Boeker's and Mr. Felker's actions may have violated Louisiana law.¹

At least 68 Employer's Work Release Agreement forms found in Louisiana Workforce files appear to have been altered. During an interview, Mr. Felker identified 26 forms that he personally altered so that they would pass inspection by the DOC auditors. Mr. Felker did not remember or recognize alterations that appear to have been made on many other forms. Mr. Boeker, Mr. Norman, and Ms. Guy claimed to be unable to recognize any of the forms as having been altered.

Mr. Felker and Mr. Boeker expressed their belief that altering documents to make them appear authentic was a trivial matter. They both indicated that such behavior is routine and inconsequential in their profession. According to Mr. Boeker, he allowed the documents to be altered in order to prevent negative audit findings, which would have resulted in personal embarrassment for him.

Separately, the Employer's Work Release Agreement form appears to be deficient in providing only one box for "Name." The form does not indicate whether the employer's representative should sign or print his or her name in the designated space. It was often difficult to decipher signatures on the forms without an accompanying printed name. The forms with only printed names contain no attestation that the signer is aware of and in agreement with the rules for participation in the work release program. Mr. Felker admitted to printing employers' names on the forms if an employer left the space blank.

Recommendations:

1. Louisiana Workforce should immediately make all its employees aware of Louisiana Revised Statute 14:72, Forgery, and the possible penalties associated with it.
2. All staff should be trained and/or retrained in the DOC Standard Operation Procedures as applied to work release facilities.
3. Louisiana Workforce should bring all its files to full compliance and DOC should conduct a second audit. Future audits should be more frequent and unannounced to ensure that Louisiana Workforce is complying with DOC standards.
4. Louisiana Workforce should consider disciplinary action against Mr. Boeker and Mr. Felker, up to and including termination.
5. DOC should revise the Employer's Work Release Agreement form to include spaces for signatures *and* printed names of the employers.

¹ La. R.S. 14:72.A, Forgery, states, "It shall be unlawful to forge, with intent to defraud, any signature to, or any part of, any writing purporting to have legal efficacy."

6. The Department of Corrections should require work release facilities to maintain original copies of every signed document.

APPENDIX A

Responses

James M. Le Blanc, Secretary
Department of Public Safety and Corrections



BOBBY JINDAL
GOVERNOR

JAMES M. Le BLANC
SECRETARY

State of Louisiana
Department of Public Safety and Corrections

November 4, 2010

Stephen B. Street, Jr.
State Inspector General
Post Office Box 94095
Baton Rouge, Louisiana 70804

Re: EBRP Work Release Facility

Dear Mr. Street:

We have reviewed your draft report dated October 22, 2010, concerning the findings and recommendations at the East Baton Rouge Parish Work Release facility. We agree with the findings as stated in the report with one note to mention. While the report indicated the monitoring team of August 12, 2010, found that the facility was in "full compliance with DOC standards," there were some items found requiring corrective action. However, these items were not associated with the Employer's Work Release Agreements and will not be mentioned in this report. The team did verify these agreements were present in a sample of offender files that were examined during the monitoring visit. The team's ability to determine if the documents were forged or altered could not have been done without any prior knowledge as it is practice to verify the form is present and consider it to be authentic.

I will now address each recommendation made in the report:

- Louisiana Workforce should immediately make all its employees aware of Louisiana Revised Statute 14:72, Forgery, and the possible penalties associated with it.**
The Department will make a return visit to the EBR Work Release facility to verify that this training has been accomplished.

Mr. Street
November 4, 2010
Page 2

2. **All staff should be trained and/or retrained in the DOC Standard Operating Procedures as applied to work release facilities.**

The Department will make a return visit to the EBR Work Release facility to verify that this training has been accomplished.

3. **Louisiana Workforce should bring all its files to full compliance and DOC should conduct a second audit. Future audits should be more frequent and unannounced to ensure that Louisiana Workforce is complying with DOC standards.**

The Department has mandated that all employer work agreements be redone with original signatures for all offenders currently in the facility. Please see attached letter to Mr. Perkins requiring this action. Additionally, Louisiana Workforce has completed this task as stated in the attached correspondence from Mr. Perkins. The Department will verify compliance with this standard during the next facility inspection.

While the Department does not complete more frequent monitoring visits of this facility, we do complete annual monitoring visits to each of the forty-four work release facilities around the state. The Department has an agreement with the Louisiana Sheriffs' Association, which is signed by Governor Jindal, to operate these work release programs. This agreement requires that the Department work "in partnership" to develop appropriate programming and facility operations. We believe that the current method of oversight reinforces the spirit of this partnership. I have attached a copy of this agreement for your review.

4. **Louisiana Workforce should consider disciplinary action against Mr. Boeker and Mr. Felker, up to and including termination.**

The Department has no jurisdiction to discipline the staff of Louisiana Workforce, but it is our understanding that disciplinary action has been taken on both employees.

5. **DOC should revise the Employer's Work Release Agreement form to include spaces for signatures and printed names of the employers.**

Attached is a copy of the Employer's Transitional Work Program Agreement form, which has been renamed and revised to include the necessary name and signature space. Additionally, the agreement form will be done annually with each employer and not on each employee.

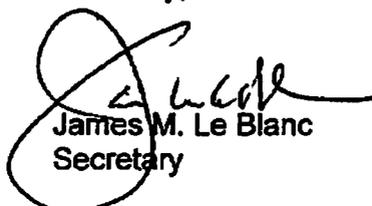
Mr. Street
November 4, 2010
Page 3

6. DOC should require work release facilities to maintain original copies of every signed document.

The Department has revised the Standard Operating Procedures to include that the employer sign an original document and copies be maintained in each offender's file that is employed by the employer. We have an implementation date of December 1, 2010, to have the one agreement with an original signature for each employer.

I trust that the above information provides clear action on the steps the Department has taken to address the above issues. If you should have any questions or need additional information, please advise.

Sincerely,



James M. Le Blanc
Secretary

JML/jb/fd

Attachments: 4

BOBBY JINDAL
Governor

JAMES M. Le BLANC
Secretary

State of Louisiana
Department of Public Safety and Corrections

September 21, 2010

Mr. Paul Perkins
Louisiana Workforce, LLC
7197 Hwy. 61 Suite A & C
St. Francisville, La. 70775

Dear Mr. Perkins,

Please be advised that the Department has been made aware that several "Employer's Work Release Agreement Forms" had been falsified at the East Baton Rouge Work Release Program in order to meet the Standard Operating Procedures (SOP) for the C-05-003 monitoring visit conducted on August 31, 2010.

The SOP requires that this agreement be signed for each offender employed and maintained on file at the facility. I am directing that the EBR program begin the process of completing new "Employer's Work Release Agreement Forms" for each offender. The documents with original signatures shall be available at the facility for review. Please notify my office in writing when this task has been accomplished.

Thanks for your cooperation and please call me if you have any questions or concerns.

Sincerely,



Jeffery E. Travis
Chief of Operations

JT/jb

cc: Secretary Le Blanc
Sheriff Gautreaux

**LA WORKFORCE, LLC
7197 HWY 61 Suite A & C
PO BOX 718
ST. FRANCISVILLE, LA 70775**

**East Baton Rouge Work Release
West Feliciana Work Release**

**Pointe Coupe Work Release
Terrebonne Work Release**

October 13, 2010

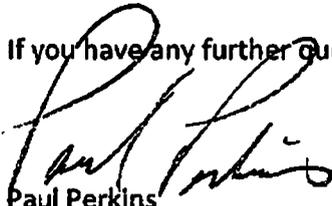
**TO: Jeffery E. Travis
Chief of Operations**

**FROM: Paul Perkins
LA Workforce, LLC**

RE: EBRWR Incident September 9, 2010

In response to your letter concerning altered documents at the East Baton Rouge Work Release. New work agreements were properly filled out, signed and placed in offender files.

If you have any further question concerning this matter, please contact me.



**Paul Perkins
LA Workforce, LLC**

PP/cb

Appendix III**AGREEMENT**

WHEREAS, the Louisiana Department of Public Safety and Corrections (hereinafter referred to as "DPS&C") and the Louisiana Sheriffs' Association (hereinafter referred to as "LSA") mutually agree that to effectively prepare offenders to transition from jail to the community is in the best interest of the citizens of Louisiana; and

WHEREAS, the DPS&C and the LSA agree to work through a collaborative partnership to develop reentry strategies that address public safety risks and benefit offenders and their families, victims, and the entire community; and

WHEREAS, the LSA has determined that it is desirable to develop and maintain certain Basic Jail Guidelines, Standard Operating Procedures for Offender Work Release Programs and transition initiatives for use by its membership; and

WHEREAS, the DPS&C has a continuing interest in and relationship with parish and local jail facilities and the housing of DPS&C offenders therein; and

WHEREAS, the DPS&C finds that it is in the best interest of the State to assist and cooperate with the LSA in efforts to develop certain Basic Jail Guidelines and Standard Operating Procedures for Offender Work Release Programs and for Transition/Reentry facilities, for use by its member Sheriffs and other local jail administrators.

NOW, THEREFORE, it is agreed that the DPS&C and the LSA and its member Sheriffs as well as other local jail administrators, will work in partnership to develop transition strategies as well as Basic Jail Guidelines, Standard Operating Procedures for Offender Work Release Programs and a certification process to certify compliance. The DPS&C will provide technical assistance upon request and subject to availability of appropriate resources

The Louisiana Sheriffs and local jail administrators (hereinafter referred to as "Participants") agree to participate in the development and maintenance of the Basic Jail Guidelines, Standard Operating Procedures for Offender Work Release Programs, and Transition/Reentry facilities which are applicable to DPS&C offenders as a condition of being allowed to house DPS&C offenders on a continuing basis, subject to normal weekly DPS&C intake quotas. Those participants who demonstrate sustained compliance shall be granted certification by the DPS&C.

CERTIFICATION OF COMPLIANCE**Basic Jail Guidelines**

Compliance with the Basic Jail Guidelines (BJG) will be monitored by the appropriate Regional Team Leader and monitoring team that is staffed by employees of the DPS&C. Review of the monitoring process and resolution of monitoring issues will be the responsibility of a Jail Operations Committee (hereinafter referred to as "Committee"), composed of an equal number of representatives from the DPS&C and the LSA. The Secretary of DPS&C shall serve as Chairman of the Committee. Committee members shall not receive compensation or a per diem for their service on the Committee.

Once a monitoring inspection of the facility has been conducted by the Monitoring Team, the Regional Team Leader shall submit, within fifteen (15) days, a written report to the BJJ Administrator. The BJJ Administrator shall provide a copy of the report to the Participant and the Committee. The Participant shall submit a written response to the BJJ Administrator on any finding in the report within fifteen (15) days of receipt of the inspection report. The BJJ Administrator will provide a copy of the response to the Committee.

Compliance with any federal or state decree regulating conditions of confinement shall be deemed compliance as to any guideline or procedure covered by the decree even if the decree calls for a different standard.

If non-compliance is determined with one or more of the Basic Jail Guidelines, the Participant must, within 30 days of notification of such non-compliance, submit to the Basic Jail Guidelines Administrator a plan of action to correct the deficiency. Such corrective action must be completed no later than 90 days after the submission of the plan of action. In the event of an emergency, intake may be suspended and state offenders may be removed from the facility.

In the event the participant fails to develop a plan of action, or once developed, fails to implement the plan, the Committee shall determine whether such non-compliance constitutes "substantial non-compliance" with the Basic Jail Guidelines. If it is determined that "substantial non-compliance" exists, the DPS&C may then, at its option, remove state offenders from the Participant's custody. New commitments will also be removed from the Participant's custody within 30 days of the date of sentencing to the DPS&C.

After the initial inspection/monitoring visit of the facility by the DPS&C, subsequent compliance inspections will be conducted every three years. More frequent inspections may be required by the DPS&C as deemed appropriate by the Secretary. The determination for more frequent inspections will be based on significant monitoring issues of concern or non-compliance with one or more Basic Jail Guidelines during the most recent inspection. Between compliance inspections, the participant shall submit an annual statement to the appropriate Regional Team Leader confirming continued compliance with the Basic Jail Guidelines. The annual statement shall also include a current fire marshal and health inspection report, any proposed or projected expansions, and any programs that are available to the state offender population.

Standard Operating Procedures for Offender Work Release Programs

Compliance with the Standard Operating Procedures for Offender Work Release Programs (SOP) will be monitored on an annual basis by the appropriate Regional Team Leader and monitoring team that is staffed by employees of the DPS&C. Review of the monitoring process and resolution of monitoring issues will be the responsibility of Committee.

Once a monitoring inspection of the facility has been conducted by the monitoring team, the Monitoring Team Leader shall, within fifteen (15) days, submit a written report detailing the results of the inspection to the Chief of Operations. The Chief of Operations shall provide within thirty (30) days of the monitoring inspection a copy of the report to the Participant and the Committee. The Participant shall submit a written response on any finding noted in the inspection report to the Chief of Operations within fifteen (15) days of receipt of the inspection report. The Chief of Operations will provide a copy of the response to the Committee.

Compliance with any federal or state decree regulating conditions of confinement shall be deemed compliance as to any guideline or procedure covered by the decree even if the decree calls for a different standard.

If non-compliance is determined with one or more of the requirements of the SOP, the Participant must, within 30 days of notification of such non-compliance, submit to the Chief of

Operations a plan of action to correct the deficiency. Such corrective action must be completed not later than 90 days after the submission of the plan of action. In the event of an emergency, intake may be suspended and state offenders may be removed from the facility.

In the event the Participant fails to develop a plan of action, or once developed, fails to implement the plan, the Committee shall determine whether such non-compliance constitutes substantial non-compliance with the SOP. If it is determined that substantial non-compliance exists, the DPS&C may then, at its option, remove state offenders from the Participant's custody.

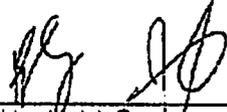
After the initial inspection/monitoring visit of the facility by the DPS&C, subsequent compliance inspections will be conducted on an annual basis. More frequent inspections may be required by the DPS&C as deemed appropriate. Work Release facilities are required to submit monthly and annual reports to the Chief of Operations as required in Chapter 4 of the Standard Operations Procedures for Offender Work Release Programs.

PER DIEM

For, and in consideration of, Participant's participation in this Agreement, the State of Louisiana agrees to pay Participant the sums as set forth by Louisiana Revised Statutes 15:824, 15:1111, 15:1135 and/or the DPS&C Standard Operating Procedures for Work Release Offenders for each DPS&C offender housed by Participant. This payment shall not affect, modify or abrogate any other obligations of the State of Louisiana contained in any other agreements, statutes or court decrees, whether state or federal.

This Agreement, the Basic Jail Guidelines, and the Standard Operating Procedures for Offender Work Release Programs are not intended to nor do they create in any convicted offender, pre-trial detainee, arrestee, employee, visitor or any other person of any class or category whatsoever, any liberty interests, right or privileges under federal or state constitutions, laws, rules, regulations or ordinances, or any local or municipal, or other, constitutions, laws, ordinances, codes, or charters irrespective of the use of mandatory language herein or any other provisions hereof. If any person of any class or category whatsoever has any liberty interest, rights or privileges, they must exist completely apart from and independent of this Agreement.

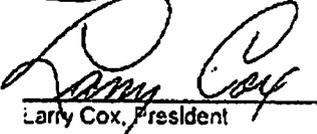
STATE OF LOUISIANA

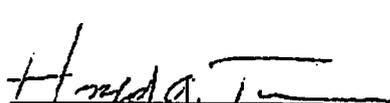
By: 
Bobby Jindal, Governor

LOUISIANA DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS

By: 
James M. Le Blanc, Secretary

LOUISIANA SHERIFFS' ASSOCIATION and ITS MEMBER SHERIFFS

By: 
Larry Cox, President

By: 
Hal Turner, Executive Director

Print Form

Form A-04-002-SOP-12-2
01 December 2010

LOUISIANA DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONS

EMPLOYER'S TRANSITIONAL WORK PROGRAM AGREEMENT

Between

(Transitional Work Program Facility Name)

And

(Organization or Company Name {Employer})

This Agreement, represents the understanding by Employer of terms and conditions necessary for participation in the Louisiana Department of Public Safety and Corrections Transitional Work Program.

_____, hereinafter referred to as "Employer", acknowledges, understands and agrees to the following terms and conditions:

1. Any Department of Public Safety and Corrections offenders in my employ will be covered by my insurance, and/or workmen's compensation insurance as required by law, including vehicle insurance when being transported to and from the job.
2. Offenders will be withdrawn from employment in the event of a strike.
3. The consumption of alcoholic beverages or illegal drugs by an offender is prohibited. If Employer has knowledge or suspicion that an offender is using either of these substances, Employer will immediately notify the transitional work program facility.
4. Offenders must report immediately to and return directly from work each day. Offenders must be transported directly to the work site or released directly to the employer or his representative. No offender is to be released at a pick-up point to wait for his employer or his representative to pick him up. At no time is an employer to have an offender unsupervised, including the transportation process to or from the employment location. Offenders must be under supervision at all times. Any known violations will be reported to the transitional work program facility by the Employer.
5. Employer understands and agrees that staff members from the transitional work program facility or the Department of Public Safety and Corrections may visit the offenders' work location at any time.
6. Offenders will be kept under supervision at all times by a designated employee representative, preferably a supervisor. Employer agrees to keep the transitional work program facility advised of the offenders' whereabouts, and to report any problems.
7. The offender will not be a member of any union.
8. Any income assignment order/notice received from the Department of Social Services will be forwarded to the transitional work program facility where the offender is housed.
9. No offender may be an immediate family member of any staff member of the company by which the offender is employed.
10. Any sexual activity or relations or attempted sexual activity or relations between a civilian and an offender are expressly forbidden. Any such actions will be immediately reported to the transitional work program facility.
11. The entire wages for the transitional work program participants are to be made payable to the offender using a standard payroll check or direct deposit to the offender trust account of the transitional work program facility. All wages will be turned in to the transitional work program facility each pay period including final payment and/or bonuses received, accompanied by a statement which includes the offender's name, DOC number, deductions made, pay period, and the computation of gross wages.

The undersigned employer representative is fully authorized to enter into this agreement and acknowledges that the agreement is binding on the employer, its successors, representatives and permitted assigns. This agreement contains or has attached hereto all the terms and conditions agreed upon by the parties to the agreement. In witness whereof, this agreement is signed and entered into on the date indicated below.

Employer:

Organization or Company:
Address:
Telephone Number:
Representative Printed Name and Title:
Representative Signature:
Date:

Transitional Work Program:

Transitional Work Program Facility Name:
Representative Printed name and Title:
Representative Signature:
Date:

Paul Perkins

Louisiana Workforce, L.L.C.



Louisiana Workforce, LLC
Corporate Office
P.O. Box 718
7197 Hwy 61
St. Francisville, LA 70775
2245-635-5440

November 3, 2010

Mr. Stephen B. Street, Jr.
Louisiana Inspector General

RE: Louisiana Workforce, L.L.C.
Case No. CID-11-009

Dear Mr. Street:

I am writing in response to the above captioned matter. First and foremost, I want to thank you and your staff for bringing the discrepancies to our attention. I also appreciate the professionalism of your investigators during the 2-3 weeks of investigation. I have the utmost respect for your lead detective, Greg Phares, and have actually worked for him previously.

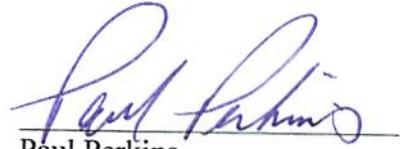
However, there are several clarifications I would like to make regarding the investigation report. Louisiana Workforce, L.L.C. was only made aware of the alleged improprieties of a few of its employees when the investigators arrived with their search warrant. At that time, the company immediately took the necessary steps to perform an internal investigation and take the appropriate corrective action to ensure the situation does not occur again.

Furthermore, the infraction did not impact conditions of confinement at any time. Therefore, the punishment of removal of inmates should not have been referenced in the report. The Department of Corrections allows thirty (30) days to take corrective action when files are incomplete. However, Louisiana Workforce, L.L.C. remedied the issue in less than one week.

Since the time the infraction was brought to the company's attention, I have personally met with Secretary Leblanc and Chief Travis of the Department of Corrections and members of the Sheriff's Association and assured them this behavior would not be tolerated. The individuals that were responsible for the infraction have been disciplined accordingly. As you are well aware, individuals sometimes act outside the scope of the company's policies and procedures, but that should not reflect negatively upon the company as a whole. Also, the situation has been discussed at our regular staff meetings and will continue to be discussed in the future as a preventative measure.

The Department of Corrections Standard Operating Procedure requires DOC to conduct annual audits of the company's overall operations. The SOP also requires Louisiana Workforce to have financial audits from an independent firm as well. From this point forward, Louisiana Workforce, L.L.C. will have independent auditors conduct random inspections of the facilities' records. Furthermore, the proper procedures related to record keeping will be continuously discussed and trained upon at the regular staff meetings.

Once again, thank you for bringing this to our attention and Louisiana Workforce, L.L.C. will continue to do what it takes to make the system better. Please contact me with any questions and/or concerns.

A handwritten signature in blue ink, appearing to read "Paul Perkins", written over a horizontal line.

Paul Perkins
Louisiana Workforce, L.L.C.

Edward Boeker, Warden
Louisiana Workforce, L.L.C.

November 5, 2010

Mr. Stephen B. Street, Jr.
Louisiana Inspector General

RE: Louisiana Workforce, L.L.C.
Case No. CID-11-009

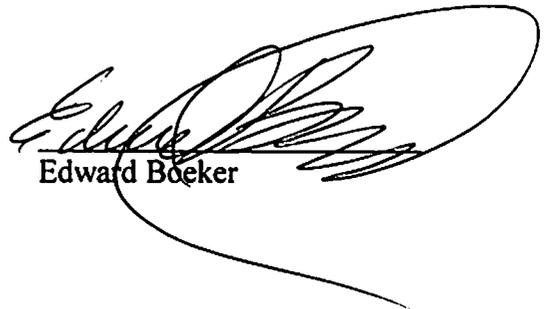
Dear Mr. Street:

I am writing in reference to the above captioned matter. There are a few issues that I wish to address. I am aware that the investigation revealed some infractions, however there should be some clarification of statements within the report. There are several areas in the report that appear to report opinion as fact and also that do not properly quote the parties.

On page five of the report, there is a statement attributed to Mr. Felker that I suggested he prepare for the audit as we had done when working for the Department of Corrections by creating documents for the files. This is simply not the case. In my interview with the investigators, I advised them that I had never altered nor seen anyone alter documents for an audit during my career with the Department of Corrections.

Furthermore, the suggestion on page 6 that I believe the matter to be trivial is inaccurate. The investigators took what was actually said out of context. I advised the investigators that I was not aware that my actions could be considered forgery. However, once it was made clear to me, I realized the seriousness of the situation. Also, I never made a statement that altering documents is routine and inconsequential in my profession. The investigators apparently took something that was said out of context.

Thank you for allowing me to respond to the report. I do realize that a serious infraction of rules occurred. However, it did need to be pointed out that there were opinions and assumptions strewn throughout the report that could be mistaken for fact. I am certain that no one would want inaccurate information released.



Edward Boeker

Reggie Felker, Assistant Warden
Louisiana Workforce, L.L.C.

November 5, 2010

Mr. Stephen B. Street, Jr.
Louisiana Inspector General

RE: Louisiana Workforce, L.L.C.
Case No. CID-11-009

Dear Mr. Street:

I am writing in regard to the above captioned matter. In reference to the investigative report, there are a few issues that I wish to address. First of all, I do realize that the infraction was of a serious nature and it was appropriate for me to be disciplined. However, the report appears to contain many assumptions that could be interpreted as facts and also inaccurate quotations.

On page 6 of the report, there is reference to an alleged statement that I did not believe my actions were of a serious nature. However, this statement was misquoted and taken out of context by the investigators. The true meaning was that AT THE TIME of the incident, I did not realize the seriousness of the infraction. However, since the investigation began, I have become acutely aware and agree that the infraction was of a serious nature.

On page 5 of the report, there is a reference to an alleged statement that suggests it was routine to create documents for audits when I worked for the Department of Corrections. However, once again, the statement is not correct. My statement at the time meant that when I did work for Corrections, we would work extra hours to make sure everything was in order for the audit. Examples of this would be that master inventories were checked such as key, chemical and tool control to ensure they were correct. If a tool was missing or a key was changed the master inventory had to be changed and the supporting documentation completed to account for the discrepancy. I made no statement made that forms were altered to pass audits.

An example of an assumption is on page 6 of the report as well. The investigators allege that 68 documents were altered. However, there is only evidence that 26 documents were altered. I bring this to your attention because the allegation of 68 documents altered is mere opinion and should not be in the report. Evidence is a key issue when dealing with such situations and not just assumptions.

Thank you for allowing me to respond to the report. As you are aware, sometimes mere assumptions and opinions can be taken as fact by the reader. Therefore, it should be noted that there is a possibility of misinformation in the report.


James Felker

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A copy of this report has been made available for public inspection at the Office of State Inspector General and is posted on the Office of State Inspector General's website at www.oig.louisiana.gov. Reference should be made to Case No. CID-11-009. If you need any assistance relative to this report, please contact Greg Phares, Administrative Program Director at (225) 342-4262.

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