



STATE OF WASHINGTON
DEPARTMENT OF CORRECTIONS
P.O. Box 41100 • Olympia, Washington 98504-1110

February 19, 2020

Joanna Carns
Office of Corrections Ombuds
PO Box 43113
Olympia, WA 98504

Dear Ms. Carns:

The Washington Department of Corrections appreciates the opportunity to respond to the OCO Report on the 'OCO investigation into an allegation of retaliation against a person incarcerated at Monroe Correctional Complex – Special Offender Unit' completed by the Office of Corrections Ombuds.

Recommendation	Response
DOC should ensure that the staff conduct investigative process is thorough, appropriate and conducted by a neutral and impartial investigator.	<p>Beginning on February 10, 2020, the new statewide grievance manager began with the Department of Corrections. As a former OCO assistant ombuds, the new statewide grievance manager has already been immersed in medically-related grievances and DOC's process. Additionally, she has read the final results of the OCO Grievance Workgroup report and will be collaborating with facility leadership to move Corrective Action Plan (CAP) items forward to restructure processes moving forward.</p> <p>Currently, grievance investigator training has been made available online through LMS and all staff involved in researching and investigating responses are required to complete the training. The statewide grievance manager and correctional program administrator have scheduled a statewide grievance training for March 2020 that will include all specialists and assistants to roll out the CAPs and provide them local assignments to complete at their respective locations.</p> <p>As presented at the February superintendents' meeting, there is to be consideration given on "who" is assigned staff conduct investigations</p>



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	<p>to ensure that a “neutral and impartial investigator” is assigned. This will be followed by monthly data gathering and quarterly reports to provide updates on program efficiencies and/or performance gaps.</p>
<p>Establish a DOC-wide recognized process for staff misconduct investigation processes, and ensure that anyone authorized to conduct a staff misconduct investigation has received proper training in order to properly and thoroughly execute the investigation.</p>	<p>The Department has now made the grievance investigation training more accessible by creating an online LMS training module, which was implemented on January 6, 2020. The training is now available for completion by all department staff and is required for completion by all staff who conduct grievance investigations.</p> <p>Please see exhibit C</p>
<p>DOC should require that investigative interview summaries are documented and provided as an attachment to all investigative processes.</p>	<p>As part of the training being delivered in early March, the statewide grievance manager and correctional program administrator will roll out examples of thorough interview summaries so that facility grievance specialists can provide 1:1 training to investigators at their locations. As part of the update to DOC 05-311 <i>Grievance Investigation Expectations</i>, language will be added to include verbiage that states the form can only be signed as completed if all referenced attachments and summaries are attached. The form was updated February 13, 2020. The training will instruct specialists to review the investigator report to ensure all areas are covered and attachments included. If there appear to be deficiencies, the specialist will meet with the investigator to clarify the need for the missing information and return of a completed packet.</p> <p>Please see Exhibits A and B</p>
<p>DOC should require that all interviews are conducted in confidential and private locations.</p>	<p>Policy 550.100 <i>Offender Grievance Program</i> will be revised by the agency during calendar year 2020. The grievance coordinator training will be taking place on March 4, 2020, and the</p>



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	<p>correctional program administrator has disseminated a reminder email to all investigators about the need for confidential and private locations when conducting interviews. In addition, the correctional program administrator has sent the intent to add this language into the policy during the planned revision later in 2020.</p> <p>Please see Exhibits D and F</p>
<p>DOC should require that all investigators are unbiased, impartial, and without conflicts of interest for the assigned investigation.</p>	<p>The Department is updating the correctional worker core grievance program training curriculum, the grievance program manual, Policy 550.100 <i>Offender Grievance Program</i>, and the grievance coordinator orientation to emphasize that grievances should be investigated and responded to in an unbiased and impartial manner.</p> <p>Please see Exhibit E</p>
<p>All evidence provided to an investigator needs to be included in or attached to the report.</p>	<p>As part of the training being delivered in early March, the statewide grievance manager and correctional program administrator will roll out examples of thorough interview summaries so that facility grievance specialists can provide 1:1 training to investigators at their locations. As part of the update to DOC 05-311 <i>Grievance Investigation Expectations</i>, language will be added to include verbiage that states the form can only be signed as completed if all referenced attachments and summaries are attached. The form was updated February 13, 2020. The training will instruct specialists to review the investigator report to ensure all areas are covered and attachments included. If there appear to be deficiencies, the specialist will meet with the investigator to clarify the need for the missing information and return of a completed packet.</p> <p>Additionally, DOC Policy 420.375</p>



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	<p><i>Contraband and Evidence Handling</i> was recently updated and a memo of procedure will be added, if necessary, to define grievance evidence handling and disposal.</p> <p>Please see Exhibits A and B</p>
<p>DOC appointing authorities should ensure that the “Grievance Investigator’s Checklist” has been completed in full and that all items have been attached to the investigative report, prior to accepting a report as completed.</p>	<p>Policy 550.100 <i>Offender Grievance Program</i> will be revised by the agency in 2020. An email has been sent to the policy office to please incorporate these changes in the upcoming policy revision. In addition, the <i>Grievance Investigation Expectations</i> form 05-311 has been updated and implemented on February 13, 2020, to reflect that an investigation is not complete unless the entire form has been completed and all investigative items are attached and signed before a report is completed.</p> <p>Please see Exhibits A and B</p>
<p>DOC should better define when allegations of staff misconduct, such as retaliation or providing false information, should be separately investigated, even if the underlying issue is non-grievable.</p>	<p>The correctional program administrator and the statewide grievance manager will be working with human resources (HR) to determine language or “situations” that should prompt the investigator to immediately meet with superintendent/designee over concerns of staff misconduct. Even in a circumstance where a grievance may be found non-grievable or unfounded, there may be clear concerns for misconduct that occurred during a situation with the grievant that should be looked into further. It will be up to the superintendent/designee to review the investigator’s concerns with HR to decide if additional actions must occur.</p>

The information provided by the OCO was useful to ensure the Department of Corrections is doing everything it can to ensure an incarcerated person’s time in the agency’s facilities is a fair and safe space for all incarcerated individuals.



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We also appreciate your team's understanding of the unique processes across facilities and the addition of policies and procedures being put in place to address them. We are working towards proactivity and improving quality assurance processes throughout the department. Moving forward, Washington Department of Corrections will continue to collaborate with the Office of the Corrections Ombuds to implement additional policies, procedures, and security measures to continue to improve the facility operations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Sinclair".

Steve Sinclair, Secretary
Washington Department of Corrections

Exhibit A

From: [Flynn, Lisa J. \(DOC\)](#)
To: [DOC DL GRIEVANCE](#); [DOC DL ALL SUPERINTENDENTS](#); [DOC DL ALL CPMs](#); [DOC DL ASSOCIATE SUPERINTENDENT](#); [DOC DL ALL CAPTAIN STAFF](#)
Cc: [Herzog, Robert L. \(DOC\)](#); [Perkinson, Paige T. \(DOC\)](#); [Barclay, Jeremy S. \(DOC\)](#); [Cotton, Jeneva M. \(DOC\)](#); [Fithian, Tomas P. \(DOC\)](#); [Russell, Scott J. \(DOC\)](#)
Subject: 05-311 Grievance Investigation Expectations
Date: Friday, February 14, 2020 12:25:44 PM
Attachments: [05-311.docx](#)

Happy Friday everyone!! In an effort to improve the quality of grievance investigations, we have updated DOC 05-311 and it is now live. This form has been revised to include better instructions for grievance investigators, as well as, ensuring that anyone assigned to complete a grievance investigation has completed the online training. Moving forward, we are asking all managers and administrators to support the work of your grievance specialists and those assigned to conduct investigations in work releases and the field by understanding that details **MUST BE INCLUDED** in a thorough investigation report and summary. Filling out the new form in totality will support the inclusion of the necessary details, but it is still just a tool.

It is our hopes with this improved tool that issues can be resolved at the local level, seeking to educate individuals, addressing their concerns, finding suitable resolutions to avoid Level 3 investigations. Many of the grievances pushed to Level 3 have been pushed back down to facilities and offices when Headquarters personnel find information missing from the prior level responses.

For those who review Level 2 responses, please be sure that the investigative report attached is reviewed and includes all of the information and actions taken to warrant signature. Grievance Specialists are your Subject-Matter Experts (SME) in the prisons and are committed to doing their part to resolve at Level 0 or 1, if possible. So, when they have to assign out for investigation, [please listen to feedback they provide you](#) regarding missing content, interviews that should be done, etc., in order to support low-level, early resolution.

For work releases and field staff, I hope to have a new CS3 for you very soon to assist in guidance for you and your staff. In the interim, Carol and I are here when you need us.

Thank you for all of your hard work and commitment to early resolution!!

Lisa J. Flynn, CDE

Correctional Program Administrator

Pronouns: *She/Her/Hers*

WA State Dept. of Corrections

PO BOX 41100, Mail Stop 41100
Olympia, WA 98504-1100

Office: 360.725.8821



GRIEVANCE INVESTIGATION EXPECTATIONS

Confidential

Investigator Instructions: You have been assigned to conduct an investigation regarding a complaint filed through the Statewide Grievance Program for incarcerated individuals. As an investigator, you are expected to complete a thorough and impartial investigation of the allegations and work to provide fair and satisfactory solutions. All interviews, documents, evidence, and conversations are to remain CONFIDENTIAL and will not be shared with anyone outside of the investigation other than the Appointing Authority. The grievance report will NOT be given to the grievant (or an employee grieved). Employee(s) of a conduct grievance may request to know the outcome upon request.

All grievance investigators must complete DOC Grievance Investigating online training prior to completing an investigation. By checking the box below, you are confirming that you have completed the required training and are prepared to proceed as an objective and professional investigator:

I have completed DOC Grievance Investigating online training to conduct this investigation.

INTERVIEW: YOU MUST INCLUDE the name, date, time, and location for each person interviewed and a synopsis of their testimony. You may accept written statements, signed and dated by the author to include in your investigation.

GC INV

- Grievant _____
- Employee grieved _____
- All employees/contract staff/volunteers listed as witness in the grievance _____
- Incarcerated witness(es) named _____
- Others (e.g., medical, chaplain, CUS, Captain) _____
- Other personnel identified during the investigation. Note any interview or evidence that could not be obtained _____

REVIEW: YOU MUST CONFIRM that you have reviewed all necessary evidentiary items, identifying what was reviewed, etc.

GC INV

- Appropriate records (e.g., correspondence, kites) _____
- Pertinent policies, procedures, RCWs, etc. _____
- Forms, charts, lists, other statistical data _____
- Media (e.g., video, audio, photos) _____

**Send all media to HQ Grievance, P.O. Box 41129, Olympia, WA 98504-1129 or Campus Mail: MS 41129.*

This checklist contains items that **MUST** be addressed in the report



GRIEVANCE INVESTIGATOR REPORT

OFFENDER GRIEVANCE PROGRAM MANAGER/DESIGNEE COMPLETES			
Name	DOC number	Location	Grievance log number
Assigned to	Type of grievance <input type="checkbox"/> Routine <input type="checkbox"/> Employee conduct/reprisal		Date assigned
Assigned by	Phone number		Due date
Summary of what is being grieved (Required): <hr/>			

INVESTIGATOR NOTES (REQUIRED)
Name(s) of person(s) interviewed & date(s), time(s), location(s) of interview(s):
Synopsis of interview(s):
Citation of documents (applicable policies, WAC, RCW, OMs, etc.):
Evidence found to substantiate or refute the grievance:
Conclusion of the investigation (provide summary): <ul style="list-style-type: none"> • Substantiated: evidence to support and prove the truth of the claim • Unsubstantiated: evidence not viable to substantiate or uphold the accusation or the defense of the accused. • Not founded: Evidence does not support allegations.

Recommended response:

Completed by _____ Title _____ Date _____

The contents of this document may be eligible for public disclosure. Social Security Numbers are considered confidential information and will be redacted in the event of such a request. This form is governed by Executive Order 16-01, RCW 42.56, and RCW 40.14.

Distribution: **ORIGINAL** - Local Grievance Office



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January 6, 2020

To: All Staff

From: Robert Herzog, Assistant Secretary, Prisons Division
Mac Pevey, Assistant Secretary, Community Corrections Division
Danielle Armbruster, Assistant Secretary, Reentry Division

rcw
[Handwritten initials and a circled mark]

RE: **Grievance Investigation Training in LMS**

The purpose of the grievance program is to serve as an unbiased internal grievance and appeal system that promotes effective communication between staff and individuals under the jurisdiction of the department. Having an appropriate administrative avenue for voicing complaints without fear of retaliation, **is an important element of helping to create safer environments.** One of the great values of the program is providing an appropriate avenue for voicing concerns which helps to mitigate acting out frustrations in ways that increase risk to our safety and security. Additionally, any humane system interested in finding ways to improve operations will have a formal and official process to review and respond to concerns. If you have ever studied causal factors that lead to unrest and disturbances, then you know a lack of an official process for voicing concerns has long been identified as a contributing factor for disturbances.

One area where improvement will help strengthen the program and increase timeliness of response is completion of thorough grievance investigation reports. As a way to make grievance investigation training more accessible to those who complete investigations and to better ensure the completion of thorough grievance investigation reports, Grievance Investigation Training has been uploaded into LMS and is accessible to all DOC staff. If you are a staff member that conducts grievance investigations you are required to take this training. It does not take long and completion of the training in LMS will assist in tracking training compliance.

You can access the course, **“DOC Grievance Investigator Training”**, through the Course Catalog on the home page of LMS. The steps to complete the course are as follows:

- Search for the course in the Course Catalog and click on the “Details” box.
- On the next screen, click “Enroll” in the top right corner. Then click on the “Open” box on the first line under “Activity Name”. This will launch the course in PowerPoint and allow viewers to navigate through the slideshow.
- At the end of the slideshow, after closing the PowerPoint, you will be returned to LMS. Click on the “Launch” box to complete the one question “test” that asks you to verify that you have verified the PowerPoint in its entirety.
- If you don’t select “True” to this question, you will not get a completion for the course. If you select “True”, you will be returned to the previous page where you have the option of printing a certificate by clicking the box in the top right of the screen.
- Once you have printed the certificate, you can “Close Record” at the very top of the screen and exit out of LMS.

Thank you in advance for your attention to this and commitment to help strengthen the grievance program.

cc: Theo Lewis, Administrator Work Release

Exhibit D

From: [Dahne, Dennis D. \(DOC\)](#)
To: [DOC DL GRIEVANCE](#)
Cc: [Flynn, Lisa J. \(DOC\)](#); [Perkinson, Paige T. \(DOC\)](#); [Smith, Carol \(OCO\)](#)
Subject: Grievance Program Action Plan
Date: Tuesday, February 18, 2020 12:29:48 PM
Attachments: [Grievance program action plan.doc](#)

Hi, everyone!

I wanted to send out the attached Grievance Program Action Plan prior to our March 4th meeting so you can start to digest some of the work we will be addressing during our meeting with the Superintendents. There are only two things that we want to ensure that we are working on right now and that is teaching the staff about the revised 05-311 form and also ensuring that all staff conducting investigations understand the importance of conducting interviews in a confidential and private setting – think of it especially in its relation to staff conduct grievances where an investigator might come into the living unit to interview the grievant while the staff with the alleged misconduct is working. It may be confidential and private, but it certainly causes concern for some grievants, but more so, it removes one factor from an argument that staff then “retaliated” against an individual after witnessing them talking with an investigator or specialist. It makes good sense even though it is inconvenient at times.

So, get your brainstorming energies fired up for our meeting. Also, would someone mind contacting CI about moving back to the two part forms and get costs associated with that revision? Consider what we might need to order for every facility so we don’t deplete resources dramatically without giving them a heads up for production. Let me know who would like to take this on for the group.

REMEMBER – Outside of the form and privacy reminders, do not act on this action plan and DO NOT DISTRIBUTE. You will be working collaboratively with your Superintendents on March 4th to start developing a plan and creating work groups around these changes. You will be the ambassadors for these changes for your facilities, so working together for a consistent roll out across the state from the subject-matter experts (you) will be critical!!

See you soon!!

Lisa J. Flynn, CDE

Correctional Program Administrator

Pronouns: She/Her/Hers

WA State Dept. of Corrections

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Action Planning Worksheet

Activities Required to Reach Future State

Date February 7, 2020

Current Situation

The Chartered Grievance Program Improvement team has completed their report to the Secretary outlining changes/improvements designed to strengthen and enhance effective communication between staff and incarcerated individuals in an effort to resolve issues at the lowest possible level. Secretary Sinclair has approved the recommendations and implementation of action items will complete the work of the improvement team.


Desired Future State:

To assist in creating safer environments and resolving complaints at the lowest level, the DOOC Grievance program offers an unbiased administrative avenue for those in total confinement, work release and on supervision.


NOTE: All leads on action items will be responsible to communicate the change to all stakeholders



Activities	Who's Responsible	Completion Date	Ongoing Monitor if applicable
<p>1. Revise the Grievance Program Manual philosophy and purpose statements to read:</p> <p>Purpose “The DOOC Grievance Program is an unbiased internal grievance and appeal system that promotes effective communication between staff and incarcerated individuals in an effort to resolve issues at the lowest possible level.”</p> <p>Philosophy The Offender Grievance Program offers open access to a process which allows for the meaningful negotiation of problems to a just and fair conclusion. It recognizes the human dignity of offenders and staff, as well as the privileges and limitations of the State. It offers a fair and satisfactory solution to a wide variety of conflict situations.</p> <p>Since its inception in 1980, the Department of Corrections Offender Grievance Program has been, with certain exception, an open forum through which offenders can seek administrative remedies to their problems.”</p>	Lead: Lisa Flynn		


Activities	Who's Responsible	Completion Date	Ongoing Monitor if applicable
<p>2. Revise DOC 550.100 "Offender Grievance Program" and "Offender Grievance Program manual" to include definitions for employee and incarcerated individuals retaliation. Definitions to read: Retaliation Employee: Filing a grievance is a legally protected activity. Retaliation occurs when an adverse action is taken against an incarcerated individual because of that individual's engagement in a legally protected activity. Employees will not take any retaliatory action against an incarcerated individual.</p> <p>Incarcerated Individual: Retaliatory use of the grievance procedure by incarcerated individuals against a DOC employee can result in the issuance of a serious infraction #552 "Causing an innocent person to be penalized or proceeded against by providing false information." outlined in Washington Administrative Code § 137-25-030.</p>	<p>Lead: Lisa Flynn</p>		
<p>3. Update Correctional Worker Core Offender Grievance Program training curriculum to address:</p> <ul style="list-style-type: none"> a. The value and purpose of the grievance procedure, b. What retaliation is and that retaliation is prohibited by both staff and the incarcerated, c. Emphasize that grievances should be investigated and responded to in an unbiased manner. 	<p>Lead: Jason Aldana</p>		

Activities	Who's Responsible	Completion Date	Ongoing Monitor if applicable
<p>4. Ensure grievance workshops are offered at least twice per year at each institution for interested incarcerated individuals.</p> <p>5. Update Grievance Coordinator orientations for the incarcerated population to also reflect:</p> <ol style="list-style-type: none"> The value and purpose of the grievance procedure, What retaliation is and that retaliation is prohibited by both staff and the incarcerated, Emphasize that grievances should be investigated and responded to in an unbiased manner. 	Lead: Lisa Flynn		Grievance Program Manager Carol Smith responsible to ensure workshops are completed twice each year.
<p>6. Create an LMS or in-service training for refresher of veteran staff:</p> <ul style="list-style-type: none"> Training has been developed and added as a self-enroll course in the Learning Management System (LMS) for all employees who complete grievance investigations. Memo sent January 8, 2020 to all DOC employees who investigate grievances requiring that they complete this training. 	Lead: Jason Aldana	<p>Completed 1-8-2020</p>  <p>2020-01-06 Grievance Investigat</p>	
<p>7. Provide increased access to training tools for both staff and the incarcerated.</p> <ol style="list-style-type: none"> Publish grievance procedure flowchart for visual learners, Provide a grievance procedure pocket guide for every incarcerated person as part of their parent institution orientation. 	Lead: Lisa Flynn (flowchart assistance from Tanya Pleines)		

Activities	Who's Responsible	Completion Date	Ongoing Monitor if applicable
<p>8. Return to using a duplicate form for grievances</p>	<p>Lead: Lisa Flynn</p>		
<p>9. When an employee conduct grievance is found to have merit grievance coordinators will use the following standardized language in the response to the grievant: “During the investigation it was found that your grievance has merit and additional administrative action is being taken.”</p>	<p>Lead: Lisa Flynn</p>		
<p>10. Ensure all persons investigating grievances receive training on how to conduct grievance investigations. a. Add checkbox to grievance investigator checklist that affirms the investigator has completed grievance investigator training in LMS.</p>	<p>Lead: Lisa Flynn</p>		
<p>11. Revise the complaint form to better capture necessary information a. Replace current complaint form with newly designed complaint form attached to the final report as Addendum E (the addendum is incorrectly labeled “D”. It is the last addendum in the report)</p>	<p>Lead: Lisa Flynn</p>		

Activities	Who's Responsible	Completion Date	Ongoing Monitor if applicable
<p>12. Require Grievance Coordinators to meet with and provide assistance to grievant whose first grievance was returned for a rewrite, and the second grievance attempt still did not meet the DOC's requirements.</p> <p>a. Revise DOC 550.100 "Offender Grievance Program."</p>	Lead: Lisa Flynn		
<p>13. Ensure all Grievance Coordinators provide access to devices such as tape recorders to those who have an established need via a documented Accommodation Service Request.</p> <p>NOTE: (the process is not frequently used and a need for additional training exists to ensure all Grievance Coordinators know how to access tape recorders and what to do when an incarcerated person needs such an accommodation)</p>	Lead: Lisa Flynn		
<p>14. Consider a proposal for a pilot program of an incarcerated Peer Grievance Assistant at each institution.</p> <ul style="list-style-type: none"> Rationale: To ensure adequate access to the grievance procedure and recognizing the limited resources of Grievance Coordinators, employing incarcerated persons to assist others in providing information and guidance on how to appropriately write grievances that comply with the grievance program manual may improve meaningful access to the grievance program. 	Lead: Lisa Flynn		
<p>15. Create a separate appeal process for Care Review Committee (CRC) decisions, resulting in their removal from the grievance procedure.</p>	Lead: Rob Herzog	<p>Implemented Jan 5th 2020</p>  <p>CRC Appeal Process.pdf</p>	

Activities	Who's Responsible	Completion Date	Ongoing Monitor if applicable
<p>16. Create a separate appeal process for Accommodation Status Requests (ASR), resulting in their removal from the grievance procedure.</p>	<p>Lead: Rob Herzog/Risa Klemme</p>	<p>Implemented Jan 19, 2020</p>  <p>Change to Accommodation Sta</p>	
<p>17. Require Health Service Managers (HSMs) at the major institutions to respond to Level 0 and Level 1 grievances to ensure better quality responses and that critical complaints are reviewed by people with both authority and accountability.</p> <p>18. Replace the Superintendent with the Health Service Administrator as the signing authority for Level 2 medical grievance responses.</p> <p>19. Conduct training for health services managers in how to appropriately investigate and respond to grievances. (LMS grievance investigator training and additional health services specific training as determined by Health Services)</p>	<p>Lead: Mary Jo Currey, Rob Herzog</p> <p>Lead: Mary Jo Currey, Rob Herzog</p> <p>Lead: Mary Jo Currey</p>	<p>Completed Feb 6, 2020</p>  <p>healthcaregrievanc exchange.pdf</p>	

Activities	Who's Responsible	Completion Date	Ongoing Monitor if applicable
<p>20. Revise the timeframes for investigation and response by DOC staff.</p> <ul style="list-style-type: none"> • New timeframes for “Routine” grievances: <ol style="list-style-type: none"> a. 10 working days for Level 0, b. 15 days for a Level 1 response, c. 15 days for a Level 2 response, and d. 15 days for a Level 3 response. • New timeframes for “Employee Conduct” grievances: <ol style="list-style-type: none"> a. 10 working days for Level 0 (no change), b. 30 days for Level 2 (increase of 15 days) c. 15 days for Level 3 (no change). • Update Offender Grievance Program manual to reflect new timeframes 	<p>Lead: Rob Herzog</p> <p>Lead: Lisa Flynn</p>	<p>Implemented February 7, 2020 (memo to all doc showing change)</p>  <p>new time frames memo.pdf</p>	

Activities	Who's Responsible	Completion Date	Ongoing Monitor if applicable
<p>21. Create and implement a workgroup to create standardized reports related to grievance procedure trends and data that includes both quantitative and qualitative analysis. The workgroup would do the following:</p> <ul style="list-style-type: none"> ➤ Create standardized reports at both the institution and headquarters level that provide quantitative and qualitative analysis of grievance procedure trends and information, to be submitted at least four times a year (i.e. quarterly). ➤ Evaluate and standardize coding of grievances to provide better data and tracking. ➤ Evaluate and improve the grievance procedure survey language and methodology to ensure wider sampling, more targeted, substantive questions, and improved quality of feedback. ➤ Consider creating incentives and making results publicly available to the incarcerated population to ensure greater response rates. <p>Rationale: Currently, trend analysis of grievance statistics is done informally and inconsistently across DOC. Further, coding of grievances is inconsistent and/or inaccurate, leading to poor data and therefore unreliable information for analysis. An overall evaluation, standardization, and improvement of reporting and quality assurance feedback is necessary to maximize the grievance procedure's potential function as a bellwether for the entire system.</p>	<p>Lead: Lisa Flynn</p>		
<p>22. Complete action items identified in the departments response to OCO investigation report dated January 23, 2020 RE: staff retaliation at MCC (department response attached).</p>	<p>Lead: Lisa Flynn</p>		

Exhibit F

From: [Flynn, Lisa J. \(DOC\)](#)
To: [Peterson, Billie A. \(DOC\)](#)
Cc: [Perkinson, Paige T. \(DOC\)](#); [Smith, Carol E. \(DOC\)](#)
Subject: DOC 550.100 Revisions Coming
Date: Tuesday, February 18, 2020 12:58:21 PM

Hi, Billie – Wanted to give you a heads up that we will be revising the grievance policy based on the completion of the recent Grievance Work Group with OCO and others to improve our procedures. I recently had Holly update 05-311, but there are several other changes that will be occurring:

- Effective March 5th, grievance timelines are changing. Messages have gone out to the facility grievance specialists and I am working with IT to correct the OMNI side of things for the deployment.
- We will be adding language around expectations for “confidential and private locations” where interviews will be conducted.
- Additional verbiage around “fair and impartial investigators” will also be added.
- We will add language around the training requirements for those conducting investigations.
- More clarification around the 05-311 and requirements for completion to thorough investigations.
- DOC 420.375 Contraband and Evidence Handling will be referenced regarding evidence handling in grievance investigations, NEW
- Lastly, I need to look at language regarding staff conduct grievances or conduct that is discovered during the course of the investigation that points to staff conduct concerns.

Just a heads up. We are having a Statewide Grievance Specialist meeting on March 4th and out of that will come work groups to revise the manual and policy. Thank you!

Lisa J. Flynn, CDE

Correctional Program Administrator

Pronouns: She/Her/Hers

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