



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

December 31, 2019

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 systemic issue review into the 'disability-related concerns within DOC' completed by the Office of Corrections Ombuds on November 22, 2019.

Recommendations	Response
1. Increase discussion of invisible/unseen disabilities at annual training.	The ADA compliance manager has started preparing the annual ADA Coordinator Training agenda to take place in March of 2020. Discussion of invisible/unseen disabilities will be incorporated into the agenda.
2. Enhance the opportunities for ADACs to network and learn from each other.	During the annual ADA coordinator training in March 2020, there will be opportunities for ADACs to network and learn from each other. The agency has created an iDOC ADA webpage to share training and encourage networking between ADACs. The ADA compliance manager sent out an announcement of this new webpage for reference on December 19, 2019. Please see Exhibits B and F.
3. Incorporate discussion of job duties and expectations for newer ADACs.	Discussing job duties and expectations for newer ADACs will be incorporated into the annual ADA coordinator training in March of 2020.
4. Include elements that are relevant to camps and work release programs. Examples include supporting people with disabilities as they prepare for reentry; supporting people with invisible disabilities who did not screen in during reception as having a disability.	Supporting all incarcerated individuals with all types of disabilities, including scenarios for work release programs and camps will be incorporated into the annual ADA coordinator training in March of 2020. Elements include but are not limited to reentry and invisible disabilities.



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<p>5. Remind ADACs of opportunities available for professional development.</p>	<p>The ADA compliance manager receives professional development opportunities via email which are then forwarded out to the ADACs. The department has created a webpage on iDOC for all ADA related information where these training opportunities will be posted as well for reference. Please see Exhibits B and F.</p>
<p>6. Increase discussion of mental health as a disability at trainings.</p>	<p>The agency's mental health unit and the ADA compliance manager will work in tandem to expand the breadth of the ADA training to include mental health as a disability and extend examples. This will be incorporated into the annual training taking place in March of 2020.</p>
<p>7. Enhance training for new ADACs regarding ADA relevance to mental health diagnoses and other unseen disabilities.</p>	<p>The agency's mental health unit and the ADA compliance manager will work in tandem to expand the breadth of the ADA training to include mental health as a disability and extend examples. This will be incorporated into the annual training taking place in March of 2020.</p>
<p>8. Conduct assessment of all job duties and analysis of time allocation for each facility. (DOC to instruct supervisors to meet with ADACs for assessments.). If assessments indicate the need, DOC should:</p> <ul style="list-style-type: none">a. •Re-allocate job duties so that the workload is reduced for existing ADA coordinators.b. •Consider hiring part-time staff who focus solely on disability-related issues, including accommodation requests.	<p>In coordination between the agency's ADA compliance manager and the human resources unit, there will be an assessment conducted of prison ADACs during the first four months of 2020.</p> <p>Pending the assessment, the agency will determine next steps of action.</p>
<p>9. Create and distribute written guidelines that delineate ADAC duties.</p>	<p>As part of the human resources assessment, the ADA compliance manager will create the draft written guidelines delineating the ADAC duties. The draft will be reviewed and finalized at the annual training in March 2020. The final version will be posted to the ADA iDOC webpage.</p>
<p>10. Conduct training by ADA Compliance Manager of all ADACs' supervisors to</p>	<p>The ADA compliance manager attended December's Superintendent meeting and</p>



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<p>ensure their awareness and understanding of the duties and expectations of ADA Coordinators.</p>	<p>informed them of the training that will be done at the next scheduled Superintendent’s meeting outlining the duties and expectations of ADA coordinators. The assistant secretary for prisons will be inviting the associate superintendents, who serve as the ADAC supervisors, to attend this meeting and be part of the training as well.</p>
<p>11. Instruct ADACs to participate monthly, even when not presenting an Accommodation Status Report (ASR) request.</p>	<p>The ADA Compliance Manager distributed a reminder on December 12, 2019, to all ADACs of the importance of their attendance and has implemented a procedure to track attendance with the expectation that an ADAC cannot miss three or more consecutive meetings. Please see exhibit A.</p>
<p>12. Update ADA component of core training. Incorporate special attention to vulnerable populations, including individuals with disabilities.</p>	<p>In coordination between the Training and Development Unit and the ADA compliance manager in 2020, there can be an update to the existing ADA training provided to all staff. The update made can incorporate special attention to vulnerable populations, including individuals with disabilities.</p>
<p>13. Provide orientations and awareness for custody staff on ADA requirements as well as the broad range of what disabilities may look like.</p>	<p>Orientations and awareness for custody staff on ADA requirements will be updated to reflect current practices, including the agency’s current ASR process.</p>
<p>14. Require recurring mental health awareness trainings and unseen disability trainings for custody staff at place safety musters and/or as part of annual information sharing.</p>	<p>The ADA compliance manager in collaboration with security specialists, mental health staff, and other stakeholders will be preparing fact sheets with applicable information regarding mental health awareness and unseen disabilities for presentation at the facility place safety musters.</p>
<p>15. Evaluate need for new staff position dedicated to providing recurring trainings and supporting the ADA Compliance Manager.</p>	<p>The ADA compliance manager has developed a questionnaire to send out to other state correctional system ADA compliance managers to gather information about staffing levels and number of ADACs, support position, etc. The questionnaire is attached. It is expected to take 30 days from the date of sending, to get responses. Please see Exhibit L.</p>



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<p>16. Implement enhanced screening methods and procedures to identify people with functional disabilities (including disabilities resulting from TBI, Fetal Alcohol Syndrome, intellectual, learning, and psychiatric disorders) at reception and periodically throughout incarceration.</p>	<p>Corrections has partnered through a grant with University of Washington to help implement additional screening at reception. The Traumatic Brain Injury (TBI) screener is expected to debut in early 2020. In September 2020, the current grant will expire. The department is considering a new grant request to work toward screening tools for additional functional disabilities.</p> <p>There is currently an intellectual disability review form (13-457) that walks through the evaluation process and a pathway in practice for any staff person who suspects an incarcerated individual may have a general intellectual disability. Please see Exhibit J.</p>
<p>17. Review PULHES codes data entry process and provide additional training as needed.</p>	<p>The assistant secretary for health services and the chief medical officer issued a reminder on December 30, 2019, to all health services staff ensuring they follow the PULHES coding guidelines put into place by the department to help remedy any inaccurate entries. Please see attachment K.</p>
<p>18. Issue a reminder to providers to review PULHES codes for accuracy during each patient encounter.</p>	<p>The assistant secretary for health services and the chief medical officer issued a reminder on December 30, 2019, to all health services staff ensuring they follow the PULHES coding guidelines put into place by the department to help remedy any inaccurate entries. Please see attachment K.</p>
<p>19. Document ASRs in a specific location in OMNI with an ASR link on the front page.</p>	<p>The health records supervisor sent all health records staff an email on December 3, 2019, reminding of the process to document ASRs in comments to custody. Please see Exhibit C.</p> <p>The resources previously used to enhance the OMNI-HS system are no longer available and the agency will work toward this recommendation in the future.</p>
<p>20. Ensure ADACs receive transfer manifests with PULHES codes as well</p>	<p>During the review of policy 300.380 <i>Classification and Custody Plan Review</i> the</p>



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<p>as incoming transfer job screenings so as to identify individuals who may be in need of accommodations.</p>	<p>agency will add ADACs to the list of members on the job screening committee. The agency will implement this process change beginning in January of 2020.</p>
<p>21. Distribute a copy of every facility's transition plan to the appropriate ADA coordinator and superintendent for review and written acknowledgment of awareness.</p>	<p>The ADA compliance manager will be on the agenda for February's Superintendents meeting and will address the need to update the transition plans and require the ADA coordinators review and post within the appropriate facilities.</p>
<p>22. Update transition plans to reflect what has been accomplished since last update.</p>	<p>Facility managers will update the transition plan by the end of the fiscal year. Implementation of the updated plans will be contingent on the work of the legislature.</p>
<p>23. Complete implementation of each audit's recommendations.</p>	<p>Implementation of each audit's recommendations are contingent upon budget received from the state legislature. As an example, due to the legislature's granting of monies during 2017-19 budget cycle, \$1M of the \$4.2M requested was allotted to retrofit the Monroe Correctional Complex facilities to comply with standards mandated by the ADA. The department requested additional funding of roughly \$2M for other ADA retrofit projects, which were not funded in the 2017-19 budget cycle. The department will continue in future years to advocate for ADA compliance dollars to implement audit recommendations.</p>
<p>24. Reminder and re-training of ASR protocol for ADACs, so as to ensure consistency across the system.</p>	<p>Reminders and re-training of ASR protocol for ADACs will be incorporated into the March 2020 ADA coordinator training. An email reminder was sent to all ADACs on December 2, 2019. Please see Exhibit A.</p>
<p>25. Issue written guidance to all ADACs and superintendents clarifying that any request for an accommodation must be forwarded to the ARC unless they are clearly under the purview of a health care provider (e.g., wheelchair, mattress, etc.).</p>	<p>The agency will be updating the ASR protocol on January 21, 2020, and will then disseminate to the superintendents and ADACs for review and implementation. These changes will also be discussed at the annual training taking place in March of 2020.</p>
<p>26. Create ASR link in OMNI (as</p>	<p>The resources previously used to enhance the</p>



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described in Identification section).	OMNI-HS system are no longer available to the agency and the agency will work toward this recommendation in the future.
27. Implement enhanced identification processes for ADACs (as described in Identification section)	<p>Corrections has partnered through a grant with University of Washington to help implement additional screening at reception. The Traumatic Brain Injury (TBI) screener is expected to debut in early 2020. In September 2020, the current grant will expire. The department is considering a new grant request to work toward screening tools for additional functional disabilities.</p> <p>There is currently an intellectual disability review form (13-457) that walks through the evaluation process and a pathway in practice for any staff person who suspects an incarcerated individual may have a general intellectual disability. Please see Exhibit J.</p>
28. Remind ADACs and custody staff that ASRs are to remain intact upon transfer unless logistically unable to be implemented.	The assistant secretary for prisons will issue a reminder in early January 2020 to ADACs and custody staff that ASRs are to remain intact upon transfer unless logistically unable to be implemented.
<p>29. Ensure ADA Coordinators are all aware of duties, including:</p> <ul style="list-style-type: none"> a. Participating in monthly ARC calls even when they do not have an ASR to present. This is a critical networking and ongoing training opportunity. b. Establish an acknowledgment response deadline for ADA Coordinators of 14 days. c. Instruct ADACs to respond in writing to any written request or inquiry regarding a disability. 	<p>An email was distributed on December 12, 2019, by the ADA compliance manager to remind staff of these procedures and expectations. Please see Exhibit A.</p> <p>The ADA compliance manager will incorporate training on these procedures and expectations at the March 2020 annual training.</p>
30. Ensure HSR index of available items is current and circulated to all ADA Coordinators as well as all medical and mental health care staff/providers	The HSR index is current and available on the new iDOC page that was created for ADA reference. The ADA compliance manager announced this new webpage to staff on



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	December 19, 2019. Please see Exhibit B and F.
31. Ensure medical/mental health providers have access to the ASR Request form (Form 13-508) which lists possible ASRs for reference.	On December 30, 2019, form 13-508 was sent out with a reminder to all staff on where this form is located and the intended use for future reference. Please see Exhibit G.
32. Instruct DOC staff to automatically forward an HSR or ASR request to the appropriate staff member when it is received in error. Notify the requesting individual that this action was taken.	The department is strengthening policy language in policy 690.400 <i>Offenders with Disabilities</i> to reflect that an incarcerated individual can make their ADA needs known to any staff person and that the respective staff person is responsible for then transferring the information in writing to the health services manager and ADAC.
33. Develop and implement a clear protocol for issuing accommodations for people with psychiatric disabilities. This may involve a multi-disciplinary team approach in which the incarcerated person, ADA Compliance Manager, local ADA Coordinator, local mental health providers, and other necessary staff meet to address this need.	The agency's director of mental health will establish a multi-disciplinary team in calendar year 2020 to develop a clear protocol for issuing accommodations to people with psychiatric disabilities.
34. Ensure that medical and mental health providers are aware and acknowledge that they must not conflate accommodations with compliance.	The department understands the difference between accommodations and treatment compliance and will work with providers to clarify that the two must not be conflated.
35. Implement a new appeal protocol in which the ASR denial is sent to a small committee consisting of the ADA Compliance Manager, the Chief Medical Officer, and the Medical Director of Quality Assurance for reconsideration.	The ADA compliance manager distributed an email to all ADAC staff on December 12, 2019, informing them of the plan for a revision to the appeals process for ASRs that are denied. The revised process will allow incarcerated individuals to appeal directly to the ADA compliance manager and the appeal committee. This process has been officially revised and a formal memo of the new process was distributed to all staff from the assistant secretary for health services and the assistant secretary for prisons on December 19, 2019. Please see Exhibits A, C, and D.



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36. Require ADA/disability awareness training for grievance coordinators, including recognizing situations in which it is appropriate to connect the grievant with the facility ADA Coordinator.	The ADA compliance manager has been in contact with the grievance manager and will be attending the next statewide grievance meeting to provide training.
37. Ensure that grievance coordinators are trained to recognize grievances that relate to disabilities (particularly when the words disability or accommodation are not used in the grievance).	The ADA compliance manager has been in contact with the grievance manager and will be attending the next statewide grievance meeting to provide training.
38. Ensure grievance coordinators are aware of their responsibility per the OGPM to provide audio recorders or other assistance to individuals who may have difficulty preparing an adequate grievance because of their disability.	The ADA compliance manager has been in contact with the grievance manager and will be attending the next statewide grievance meeting to provide training. Prior to the training, a reminder to bring recorders for use during the training will be sent out.
39. Amend DOC policy 590.500 to clarify that Access Assistants are allowed to be paid when performing routine tasks related to legal documents (reading, transcribing, etc.) as long as they are not providing legal advice or assistance. Clarify that assignment of an Access Assistant may not obstruct or limit law library access for the person who is assigned the Access Assistant. Ensure that it remains clear that an inmate may still receive unpaid help from other incarcerated people in the law library.	Policy 590.500 <i>Legal Access for Incarcerated Individuals</i> has been revised to include this language which will be posted in early 2020.
40. Require law librarians at each facility to ensure at least annually that functioning speech to text software is available on at least one computer in each law library.	The department has added a subsection in policy 590.500 <i>Legal Access for Incarcerated Individuals</i> that requires annual checks on facility speech to text software. The agency is also analyzing the need for software updates to ensure a user friendly experience. Please see Exhibit E.
41. Establish protocol for how ADA coordinators and staff interface with educational faculty to (1) flag	The department's education administrator, in partnership with the Health Services Division, is in agreement that there is a need for a



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<p>individuals who may need accommodations in any given class, as well as (2) determine what accommodation may be reasonable and appropriate for individuals who need them.</p>	<p>dedicated psychologist trained in the administration of intellectual and learning disabilities. The department will need to secure funding to support a contract for these services. At such a time, the department will be equipped to implement the recommendation.</p>
<p>42. Hire a dedicated psychologist or equivalent who is trained in administration of LD/ID evaluations, and/or train mental health staff based in eastern and western Washington to conduct LD/ID evaluations.</p>	<p>The department's education administrator, in partnership with the Health Services Division, is in agreement that there is a need for a dedicated psychologist trained in the administration of intellectual and learning disabilities. The department will need to secure funding to support a contract for these services. At such a time, the department will be equipped to implement the recommendation.</p>
<p>43. Implement thorough screening for LD/ID at reception.</p>	<p>The department's education administrator, in partnership with the Health Services Division, is in agreement that there is a need for a dedicated psychologist trained in the administration of intellectual and learning disabilities. The department will need to secure funding to support a contract for these services. At such a time, the department will be equipped to implement the recommendation.</p>
<p>44. Remind program and classification staff of requirements under the ADA and DOC policy as well as general disability awareness.</p>	<p>The ADA compliance manager distributed a notice out to all staff for awareness of the live ADA iDOC webpage which has a link to the ADA and DOC policy for awareness and review on December 19, 2019. Please see Exhibits B and F.</p>
<p>45. Ensure reasonable accommodations are issued when necessary for an individual with a disability to be able to access their assigned programming.</p>	<p>The department has ensured that this language is included in policy 690.400 <i>Offenders with Disabilities</i> and will audit facility practice to match policy.</p>
<p>46. Remind hearing officers of requirements under the ADA and DOC policy as well as general disability awareness. Instruct hearing officers to contact local ADAC as a resource in those cases.</p>	<p>The hearings and violations administrator will send a notice in early January 2020, to all hearings staff letting them know of the new iDOC webpage with the contact information for all ADAC resources and reminding them to adhere to the requirements under the ADA and DOC policy.</p>
<p>47. Where possible, implement protocol</p>	<p>It is the department's practice that infirmary</p>



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<p>for allowing similar programming and yard time for individuals with disabilities who are assigned to infirmary housing.</p>	<p>housing is used for incarcerated individuals who are typically too ill to be involved in programming or yard time. Policy 610.600 <i>Infirmary/Special Needs Unit Care</i> does state that ‘the housing level is for patients who need temporary or longer term housing due to security/vulnerability concerns.’ Due to capacity limitations, there is a small part of the infirmary used for vulnerable incarcerated individuals that are restricted to the same yard/programming time as those who are housed there due to illness. The department is exploring options to allow those who are able more yard/programming time.</p>
<p>48. Establish a unit to support individuals with complex medical and mental health needs, similar to Sage Unit, for individuals who require medium custody. Beyond creating improved programming and therapy options for incarcerated individuals, this would be a cost-savings measure for the agency.</p>	<p>There is a decision package that has been put together for the next biennium requesting funding for an additional medium custody unit.</p>
<p>49. Ensure that all beds in Sage Unit are assigned to individuals with medical or mental health needs as appropriate for the unit. Avoid housing individuals who do not have a medical or mental health need in Sage Unit. Access Assistants and other individuals who are employed by DOC to assist individuals with disabilities typically do not require housing in the same unit. Appropriate housing assignments will likely reduce instances of intimidation/strong-arming and would be a cost-savings measure for the agency.</p>	<p>The department acknowledges that access assistants typically are not required to be housed in the same unit as the incarcerated individual they are assigned to support. For circumstances where housing in the same unit is required, the agency put into place a strict access assistant program procedure that prohibits any incarcerated person from becoming an access assistant that:</p> <ol style="list-style-type: none">1. is identified as a potential predator on the PREA screening criteria and/or2. has a criminal history offending against any person who was residing in a nursing home, mental hospital, or other non-prison institution. <p>Through the screening process implemented on this program the department hopes to reduce instances of intimidation/strong-arming. Please see Attachment H.</p>



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<p>50. Collect and analyze data to evaluate the rate at which people with functional disabilities are represented at camps.</p>	<p>The agency can begin collecting for later analysis regular snapshots in time based on ADA PULHES codes of persons assigned to minimum security units.</p>
<p>51. Collect and analyze data to evaluate the rate at which people with disabilities receive accommodations while at camp.</p>	<p>The agency has put in place a system to begin collecting the rate at which people with disabilities receive accommodations while at a minimum security unit beginning January 1, 2020.</p>
<p>52. Collect and analyze data to evaluate the rate at which people with functional disabilities are represented at work release.</p>	<p>The agency has put in place a system to begin collecting the rate at which people with disabilities receive accommodations while on work release beginning January 1, 2020.</p>
<p>53. Collect and analyze data to evaluate the rate at which people with disabilities receive accommodations while at work release.</p>	<p>Beginning January 1, 2020, the agency will begin collecting for later analysis any ASR provided at work release.</p>
<p>54. Open work release program that is better equipped to support people with mental health disabilities.</p>	<p>The Health Care Authority has clarified with the federal government that the Affordable Care Act (ACA) and associated expansion of Medicaid is applicable to the work/training release population. This expansion would allow the work release population to receive increased general and mental health care from community based providers anywhere in the state. The Health Services and Reentry divisions have agreed to work collaboratively to provide services at all twelve work/training release facilities.</p>
<p>55. Evaluate possibility of formal collaboration or MOU between DOC/work release facilities and community mental health centers.</p>	<p>The Reentry Division is working to leverage community-based mental health care (CMHC) providers to allow patient/participants to use the program, free of charge and under the care of the CMHC in or near the intended release area.</p>
<p>56. Ensure that work release supervisors (ADACs) receive additional awareness orientations and trainings related to disabilities and accommodations.</p>	<p>The ADA compliance manager has started preparing the annual ADA coordinator training agenda to take place in March of 2020. Ensuring that work release supervisors (ADACs) receive additional awareness orientations and trainings related to disabilities and accommodations will be incorporated into</p>



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	the training.
57. Instruct ADACs to disseminate information regarding awareness orientations and trainings related to disabilities and accommodations to staff (including contract staff).	The agency has created an iDOC webpage where there are trainings and orientations related to disabilities and accommodations posted and available to all staff. On December 19, 2019, the ADA compliance manager distributed an email announcing the placement of these trainings. Please see Exhibits B and F.
58. Issue written reminder to patient services representatives and their supervisors instructing them to notify the DOC Deaf Services Coordinator when scheduling appointments for an individual who is deaf and requires an ASL interpreter.	The process of notifying the DOC deaf services coordinator when scheduling appointments for an individual who is deaf and requires an ASL interpreter will be included in the upcoming patient services representative training.
59. Ensure access to a readily accessible pool of interpreters for each facility in which an individual who is deaf resides.	On the newly created ADA iDOC webpage there is a direct hyperlink to the deaf services coordinator who is the contact person for the accessible pool of interpreters for each facility as well as a direct hyperlink to the Deaf Services webpage for reference. Please see attachment F.
60. Ensure VRI (Video Remote Interpreting) or Skype services for emergent situations when an on-site ASL interpreter is not available, particularly in clinics and infirmaries. VRI or Skype should only be used in emergencies and with the permission of the person with the hearing impairment.	ADA compliance manager and information technology unit will work together to analyze and make a recommendation on the best telecommunications relay service for emergent situations when an on-site ASL interpreter is not available in clinics and infirmaries.
61. Ensure that DOC-issued hearing aids and other assistive devices are serviced and cleaned regularly and can be adjusted as needed in a timely manner. Ensure that damaged or lost hearing aids are replaced as needed in a timely manner.	Health services is currently working on a revision to the Offender Health Plan (OHP). There is an inclusion of the servicing/cleaning of hearing aids as a practice throughout the department. A memo from the assistant secretary for health services will be sent to all health services staff detailing the changes made to the OHP upon completion in early 2020.
62. Reword Hearing Aid protocol to	On October 8, 2019, the department amended



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<p>clarify that individuals are not required to wait five years from the time they received their hearing aid to have one replaced. Issue memo that explains this clarification and disseminate amended protocol to health services staff.</p>	<p>the hearing aid protocol to clarify that individuals are not required to wait five years from the time they receive their hearing aid to have one replaced. A memo was distributed explaining this change to all health services staff on December 30, 2019. Please see attachment I.</p>
<p>63. Amend DOC protocol so that individuals who have bilateral hearing loss are provided binaural (two) hearing aids regardless of the presence of other diagnoses.</p>	<p>DOC utilizes the same standard as used by community health providers and Medicaid, per the OHP. DOC will check its current protocol against that standard.</p>
<p>64. Ensure that all durable medical equipment and accommodation devices are properly documented on individuals' property matrices (both form and OMNI versions).</p>	<p>The department will revise the men's and women's facilities prison matrix forms to include all accommodation devices. The department will work toward standardizing the OMNI form to reflect the men's and women's forms attached to policy 440.000 <i>Personal Property for Offenders</i>.</p>
<p>65. Ensure that all durable medical equipment/accommodation devices and medications are transported in the vehicle with the incarcerated individual, as per DOC policy 440.020.</p>	<p>The department is creating a multi-disciplinary meeting with the assistant secretaries of health services and prisons to ensure that all facilities are following policy 440.020 <i>Transport of Property</i> when transporting medical equipment/accommodation devices of incarcerated individuals.</p>
<p>66. Provide additional training to property staff to ensure knowledge and understanding of proper handling of durable medical equipment/accommodation devices and medications during transfers.</p>	<p>The director of nursing services and the ADA compliance manager will provide this training to property staff at the next all staff property meeting scheduled in early 2020.</p>
<p>67. Amend DOC 690.400 to offer explicit definitions of critical terms, including disability. For reference, consider adopting definitions offered in Oregon DOC's revised disability policy.</p>	<p>The Department of Corrections is working with the Attorney General's office to create a definition of the word <i>disability</i> and reviewing respective current definitions for clarity and accuracy. The department will have these changes incorporated and added to the agency policy glossary by March 1, 2020. These definitions will be included in agency training modules.</p>
<p>68. DOC facilities should establish pre-</p>	<p>DOC agreed to the need for agreements with</p>



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<p>release agreements with local Social Security offices to facilitate reinstatement of benefits that were terminated after 1 year of incarceration. Encourage open lines of communication between ADA coordinators, discharge planners/reentry specialists, and other relevant staff members on this topic.</p>	<p>SSA to facilitate prompt reinstatement of SSI benefits. DOC is in the exploratory phase of this issue. DOC leadership visited Oregon during the fall of 2019 to determine whether their centralized system could be replicated in Washington. It has been determined that the system in Washington does not support replication of the Oregon model, and the department will seek alternative ways to establish agreements.</p>
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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 safe and supports the health and wellbeing for all incarcerated individuals.

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,

Steve Sinclair, Secretary
Washington Department of Corrections

Attachment A.

From: [Klemme, Risa A. \(DOC\)](#)
To: [Barclay, Jeremy S. \(DOC\)](#); [Perkinson, Paige T. \(DOC\)](#)
Subject: FW: Year-end Updates and Reminders
Date: Thursday, December 12, 2019 10:45:49 AM

From: Klemme, Risa A. (DOC)

Sent: Thursday, December 12, 2019 10:45 AM

To: Banner, Gregory O. (DOC) <gobanner@DOC1.WA.GOV>; Barron, Beth R. (DOC) <brbarron@DOC1.WA.GOV>; Bohanan, Amy (DOC) <abohanan@doc1.wa.gov>; Carbonel, Wendy M. (DOC) <wmcarbonel@DOC1.WA.GOV>; Clark, Paul B. (DOC) <pbclark@doc1.wa.gov>; Cohn, Theresa L. (DOC) <tlcohn@doc1.wa.gov>; Forss, Karen E. (DOC) <keforss@DOC1.WA.GOV>; Geer, Richard E. (DOC) <regeer@DOC1.WA.GOV>; Goodenough, Norman J. (DOC) <njgoodenough@DOC1.WA.GOV>; Grey, Kathryn M. (DOC) <kmgrey@DOC1.WA.GOV>; Hathaway, Michael S. (DOC) <mshathaway@DOC1.WA.GOV>; Hostetler, Chad R. (DOC) <crhostetler@DOC1.WA.GOV>; Klemke, Michael J. (DOC) <mjklemke@DOC1.WA.GOV>; Klemme, Risa A. (DOC) <raklemme@DOC1.WA.GOV>; Kullojka, Arben (DOC) <akullojka@DOC1.WA.GOV>; Leaf, Scott M. (DOC) <smleaf@DOC1.WA.GOV>; Leisinger, Reed P. (DOC) <rpleisinger@DOC1.WA.GOV>; Maines, Michael R. Jr. (DOC) <mrmaines@DOC1.WA.GOV>; Miller, Mark L. (DOC) <mlmiller@DOC1.WA.GOV>; Rehak, Melissa A. (DOC) <melissa.rehak@doc1.wa.gov>; Richer, Jason A. (DOC) <jaricher@DOC1.WA.GOV>; Sawyer, Andrew W. (DOC) <awsawyer@DOC1.WA.GOV>; Schreiber, Robert J. (DOC) <rjschreiber@DOC1.WA.GOV>; Simons, Dennis L. (DOC) <dlsimons@DOC1.WA.GOV>; Thomas, Kaci D. (DOC) <kdthomas@doc1.wa.gov>

Cc: David, Patricia H. (DOC) (phdavid@doc1.wa.gov) <phdavid@doc1.wa.gov>

Subject: Year-end Updates and Reminders

I cannot believe we are nearly at the end of 2019! What a successful year this has been for ADA! You have all collectively and collaboratively moved the Department's ADA objectives forward by your active participation in the ARC; attending training; reaching out with questions and difficult situations and taking advantage of outside training opportunities.

We have several exciting things planned for 2020! These include expanded training on ADA including outside trainers for our annual training; launching a web page specific to ADA as a one-stop shop for you to get links to information; training; fact sheets and other helpful information.

We are in the process of reviewing the Accommodation Status Report process to ensure it

meets our business need. This will result in a revised ASR Protocol and some revisions to Policy DOC 690.400 Offenders with Disabilities. In addition, we will be revising the appeals process for ASRs that are denied. Currently, the appeals process is the Grievance procedure. This is clumsy in many ways, not the least of which is the timeliness of the grievance process. Under the revised process, incarcerated persons may appeal directly to me and the appeal committee will be composed of the Chief Medical Officer, the Director of Quality and myself.

As we move forward into 2020, I have a couple of requests to make from you. These are based on feedback we have received from the Office of the Correctional Ombuds (OCO).

1. Please try to attend the monthly ARC meetings. This is an opportunity to network, learn from each other and ensure a fair process to consider ASRs. If you cannot attend, please reach out to me to let me know. In 2020, I will be noting absences as either excused or unexcused based on whether you told me you could not attend. If I am noting multiple unexcused absences, I will be reaching out to you and your supervisor, to determine if this task is a good fit for you.
2. As a reminder, all ASR requests (unless clearly under medical) must be put through to the ARC. There have been instances when an ASR request was denied at the facility level and did not go through the committee. This should not be the case. If you have questions about a specific issue as to whether it is medical or not, reach out to me.
3. Also, as a reminder, all ASRs whether approved or not, must be processed after the meeting. This means the coversheet is completed and routed with the ASR noting approved or not to the incarcerated individual. The original is forwarded to Health Records in Medical for filing in the health record and noting approved accommodations in "Comments to Custody".
4. One of the things that some ADA Coordinators mentioned to the OCO is that they do not have sufficient time to spend doing their ADA tasks. We will work with HR, you and your supervisor to conduct a work study to see how much time folks are spending on ADA matters. I know for some it is a lot and for others not as much, but we want to ensure that if your ADA caseload is high then we may need to make other adjustments to your work duties.
5. The other thing I will be working with you and your supervisors is to develop a standard list of ADA Coordinator duties that can be incorporated into your Position Descriptions. This way you will get credit for the excellent work that you do and acknowledgement that these duties take time. This will be discussed in greater detail at our Annual Training Meeting tentatively scheduled for March, 2020. I will have some draft language for us to review and reach consensus on.
6. Lastly, it is been noted that for the most part ADA Coordinators do a great job in responding to requests for accommodation. We have noted to OCO that we will acknowledge

requests for accommodation within 14 days of receipt. OCO staff have also stated to us they recognize the challenge of individuals who put in numerous requests for the same issue and will ask them to only make one request on an issue to the ADA Coordinator within 14 days to give you a chance to respond.

Thank you again for all the outstanding, dedicated work you do on behalf of meeting the ADA needs of our incarcerated individuals, visitors and guests. I appreciate you every day. In my meeting with the Superintendents this week, they also acknowledged the amount of work you do in ensuring our ADA responsibilities are met.

Happy Holidays and I look forward to a great 2020!

Risa

Risa Klemme

ADA Compliance Manager

Department of Corrections

Office location:

Airway Heights Corrections Center

P.O. Box 1899

Airway Heights, WA 99001

Office: 509-244-4264

Cell: 360-789-5356

Raklemme@doc1.wa.gov

Attachment B.

From: [Klemme, Risa A. \(DOC\)](#)
To: [Barclay, Jeremy S. \(DOC\)](#); [Perkinson, Paige T. \(DOC\)](#)
Subject: FW: New ADA webpage on iDOC
Date: Thursday, December 19, 2019 7:29:54 AM

From: Klemme, Risa A. (DOC)

Sent: Thursday, December 19, 2019 7:29 AM

To: Banner, Gregory O. (DOC) <gobanner@DOC1.WA.GOV>; Barron, Beth R. (DOC) <brbarron@doc1.wa.gov>; Bohanan, Amy (DOC) <abohanan@DOC1.WA.GOV>; Carbonel, Wendy M. (DOC) <wmcarbonel@DOC1.WA.GOV>; Clark, Paul B. (DOC) <pbclark@DOC1.WA.GOV>; Cohn, Theresa L. (DOC) <tlcohn@DOC1.WA.GOV>; Forss, Karen E. (DOC) <keforss@DOC1.WA.GOV>; Geer, Richard E. (DOC) <regeer@DOC1.WA.GOV>; Goodenough, Norman J. (DOC) <njgoodenough@DOC1.WA.GOV>; Grey, Kathryn M. (DOC) <kmgrey@DOC1.WA.GOV>; Hathaway, Michael S. (DOC) <mshathaway@DOC1.WA.GOV>; Hostetler, Chad R. (DOC) <crhostetler@DOC1.WA.GOV>; Klemke, Michael J. (DOC) <MKKlemke@DOC1.WA.GOV>; Klemme, Risa A. (DOC) <raklemme@DOC1.WA.GOV>; Kullojka, Arben (DOC) <akullojka@DOC1.WA.GOV>; Leaf, Scott M. (DOC) <smleaf@DOC1.WA.GOV>; Leisinger, Reed P. (DOC) <rpleisinger@DOC1.WA.GOV>; Maines, Michael R. Jr. (DOC) <mrmaines@DOC1.WA.GOV>; Miller, Mark L. (DOC) <mlmiller@DOC1.WA.GOV>; Rehak, Melissa A. (DOC) <melissa.rehak@DOC1.WA.GOV>; Richer, Jason A. (DOC) <jaricher@DOC1.WA.GOV>; Sawyer, Andrew W. (DOC) <awsawyer@DOC1.WA.GOV>; Schreiber, Robert J. (DOC) <rjschreiber@DOC1.WA.GOV>; Simons, Dennis L. (DOC) <dlsimons@DOC1.WA.GOV>; Thomas, Kaci D. (DOC) <kdthomas@doc1.wa.gov>; Amren, Jennifer J. (DOC) <jjamren@DOC1.WA.GOV>; Biddulph, Helen A. (DOC) <habiddulph@DOC1.WA.GOV>; Bradley, Meshell Y. (DOC) <mybradley@DOC1.WA.GOV>; Braverman, Suzann E. (DOC) <sebraverman@DOC1.WA.GOV>; Chan, Winnie P. (DOC) <wpchan@DOC1.WA.GOV>; Clippinger, Rebecca L. (DOC) <rlclippinger@DOC1.WA.GOV>; Deveny, Sara N. (DOC) <sndeveny@DOC1.WA.GOV>; Fitzgerald, Stacy A. (DOC) <safitzgerald@DOC1.WA.GOV>; Galando, Andrea T. (DOC) <atgalando@DOC1.WA.GOV>; Hanson, Ruth L. (DOC) <rlhanson@DOC1.WA.GOV>; Ison, Michael S. (DOC) <msison@DOC1.WA.GOV>; Jense, Laura J. (DOC) <ljjense@DOC1.WA.GOV>; Julian, Patricia A. (DOC) <pajulian@DOC1.WA.GOV>; Kupers, Melinda M. (DOC) <mmkupers@DOC1.WA.GOV>; Logan, Yolanda D. (DOC) <ydlogan@DOC1.WA.GOV>; Mans, Michele L. (DOC) <mlmans@DOC1.WA.GOV>; Neufeld, Vicky (DOC) <vneufeld@DOC1.WA.GOV>; Rensberger, Holly M. (DOC) <hmrensberger@DOC1.WA.GOV>; Ulrich, Shawn M. (DOC) <smulrich@DOC1.WA.GOV>; Zarate, Robert (DOC) <rzarate@DOC1.WA.GOV>

Subject: New ADA webpage on iDOC

We now have a web-page on iDOC dedicated to ADA. The page includes various links that may be helpful to you as ADA Coordinators. We will be adding additional information as we move forward. Please take a moment to look at the page. Please forward to me any corrections. As people change positions or ADA Coordinators change I will work hard to keep up with changes.

It is my hope the information provided will be helpful to you and to other staff.

Here is the link:

<http://idoc/agency/corrections/ada.htm>

Risa Klemme

ADA Compliance Manager

Department of Corrections

Office location:

Airway Heights Corrections Center

P.O. Box 1899

Airway Heights, WA 99001

Office: 509-244-4264

Cell: 360-789-5356

Raklemme@doc1.wa.gov

Attachment C.

From: [Klemme, Risa A. \(DOC\)](#)
To: [Barclay, Jeremy S. \(DOC\)](#); [Perkinson, Paige T. \(DOC\)](#)
Subject: FW: Change to Accommodation Status Report Appeal Process
Date: Thursday, December 19, 2019 2:47:19 PM
Attachments: [Change to Accommodation Status Report Appeal Process 12-19-2019.pdf](#)

From: Dobson, Debra L. (DOC)
Sent: Thursday, December 19, 2019 2:40 PM
To: DOC DL ALL SUPERINTENDENTS <ALLSUPERINTENDENTS@DOC1.WA.GOV>
Cc: DOC DL All Superintendent Support <DOCDLAllSuperintendentSupport@DOC1.WA.GOV>; Carns, Joanna (OCO) <joanna.carns@gov.wa.gov>; Frederick, Ronald L. (DOC) <rlfrederick@DOC1.WA.GOV>; Cotton, Jeneva M. (DOC) <jmcotton@DOC1.WA.GOV>; Russell, Scott J. (DOC) <sjrussell@DOC1.WA.GOV>; Fithian, Tomas P. (DOC) <tpfithian@DOC1.WA.GOV>; Currey, Mary J. (DOC) <mjcurrey@DOC1.WA.GOV>; Kariko, Sara S. (DOC) <sskariko@DOC1.WA.GOV>; DOC DL ASSOCIATE SUPERINTENDENT <DOCDLASSOCIATESUPERINTENDENT@DOC1.WA.GOV>; Loete, Vicki J. (DOC) <vjloete@DOC1.WA.GOV>; Klemme, Risa A. (DOC) <raklemme@DOC1.WA.GOV>
Subject: Change to Accommodation Status Report Appeal Process

This message is being sent on behalf of Mary Jo Currey, Rob Herzog and Risa Klemme.

Please share with your ADA Coordinators.

Superintendents: Please ensure this is posted for viewing by the incarcerated population.
Thank you.

Debra Dobson

Executive Secretary to Scott Russell

Prisons Division – Command A
Washington State Department of Corrections
(360) 725-8841 | Debra.Dobson@doc.wa.gov



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

[Please post for thirty (30) days – Change effective 30 days from posting]

December 19, 2019

TO: Incarcerated Population, Washington State Department of Corrections

FROM: Mary Jo Currey, Assistant Secretary, Health Services *MC*
Rob Herzog, Assistant Secretary, Prisons *RH*
Risa Klemme, ADA Compliance Manager *RK*

RE: Change to Accommodation Status Report Appeal Process

The Accommodation Status Report (ASR) is a method for the ADA Coordinator to communicate essential information concerning accommodation needs to non-clinical staff. ASRs are designed to provide direction and authorization to staff concerning approved accommodations for incarcerated individuals.

The Accommodation Review Committee meets monthly to consider accommodation requests. Accommodation requests may be approved, denied or deferred (pending additional information). Currently, the appeal process for denial of an accommodation is for the incarcerated person to utilize the Grievance Process.

The purpose of this memorandum is to notify the incarcerated population and staff that the appeal process for ASRs is changing. The new process will be to appeal to the ADA Compliance Manager who will take the appeal to a Review Committee composed of: The Chief Medical Officer; Chief Quality Officer; and the ADA Compliance Manager.

If you desire to appeal a decision concerning denial of an Accommodation Status Report (ASR): please appeal the decision to the address below within thirty (30) days of notification of the denial. As a reminder, if an accommodation is denied and your circumstances have changed, you may re-apply for an accommodation at any time without going through the appeal process.

“Working Together for SAFE Communities”

Change to Accommodation Status Report Appeal Process

December 19, 2019

Page 2

Please address appeals to:

Risa Klemme, ADA Compliance Manager
Airway Heights Corrections Center
P.O. Box 1899
Airway Heights, WA 99001

The new process will go into effect thirty (30) days from the posting of this document.

MJC:rk

cc: Joanna Carns, Ombudsman
Ronald Frederick, Statewide Grievance Manager
Prison ADA Coordinators






STATE OF WASHINGTON
DEPARTMENT OF CORRECTIONS
P.O. Box 41123 • Olympia, Washington 98504-1123

[Please post for 30 days – Change effective 30 days from posting.]

December 5, 2019

TO: Incarcerated Population, Washington State Department of Corrections

FROM: Mary Jo Currey, Assistant Secretary, Health Services 
Rob Herzog, Assistant Secretary, Prisons 
Sara Kariko, M.D., Chief Medical Officer 

RE: Change to Health Services Care Review Committee Grievance Process

The Care Review Committee (CRC) is the method by which the Washington State Department of Corrections assesses the appropriateness of purchased health care services for incarcerated individuals. Health Services has discipline-specific CRCs including Medical, Dental, Mental Health, Psychiatry, Gender Dysphoria, and Hepatitis C. Each CRC reviews cases presented by facility providers who suggest a proposed treatment/procedure that may not be authorized under the Washington DOC Health Plan, or the current condition of the patient does not meet the standard criteria for the suggested remedy. The CRC takes into account the information provided by the facility provider, considers the community standard of care and other pertinent information, and either authorizes or denies the request.

Should an incarcerated individual request the decision be reconsidered when the CRC has denied a request, the DOC Grievance process is currently followed. However, due to the determination that the CRC decision was final, such grievances had to rise to Level III before the request to reconsider the decision was reviewed by the Chief Medical Officer at DOC Headquarters.

The previous language in the Washington DOC Health Plan, under *Section XI. Appeals*- stated: "Patients may appeal authorization decisions through the normal grievance process." However, the grievance process does not generally provide the efficiency with which some medical concerns should be reviewed; thus, the Health Services Division is implementing a new process for incarcerated individuals to appeal the CRC decision. The revised language in the Health Plan will now state: "Patients may appeal CRC decisions through the appropriate CRC Appeals Committee.

Each discipline-specific CRC will maintain an independent appeals committee that will review the appropriateness of a CRC decision in the event that the decision is appealed by the patient.” With this change, the Offender Grievance Program will no longer be the pathway for seeking reconsideration of a CRC denial.

Health Services CRC Appeal Process forms (Form # TBD) will be available through the Health Services Units at each facility and in the living units. Completed appeal forms must be signed by the patient and delivered to a Health Services Manager (HSM) in your facility. The HSM will forward the appeal to the HQ CRC Appeals Committee, or you may mail the appeal directly to the HQ CRC Appeals Committee at, P.O. Box 41123, Olympia, WA 98504-1123. The appeal must be postmarked within five (5) business days of the date the appeal is signed by the patient.

Each CRC appeals team will review requests within 30 days of receipt at HQ. The decision by the appeals committee(s) will be final. The patient will be notified in writing of the decision.

This new process will be effective 30 days from posting; but no later than January 5, 2020.

MJ:sb

cc: Joanna Carns, Ombudsman
Ronald Frederick, Statewide Grievance Manager

Attachment E.

From: [Klemme, Risa A. \(DOC\)](#)
To: [Barclay, Jeremy S. \(DOC\)](#); [Perkinson, Paige T. \(DOC\)](#)
Subject: FW: Law Library Software JAWS and Magic
Date: Wednesday, December 18, 2019 10:13:17 AM

From: Schneider, Tracy L. (DOC)
Sent: Wednesday, December 18, 2019 10:07 AM
To: Christner, Jon S. (DOC) <jschristner@DOC1.WA.GOV>; Erickson, Ian L. (DOC) <ilerickson@DOC1.WA.GOV>; Kleinbach, Amy L. (DOC) <alkleinbach@DOC1.WA.GOV>; Dominique-Kastle, Miriam T. (DOC) <mtdominiquekastle@DOC1.WA.GOV>; Thompson, John S. (DOC) <jsthompson@DOC1.WA.GOV>; Hayes, Beverly L. (DOC) <blhayes@DOC1.WA.GOV>; Morrow, Lisa M. (DOC) <Immorrow@DOC1.WA.GOV>; Jackson, Venetta E. (DOC) <vejackson@DOC1.WA.GOV>
Cc: Nelson, Janet A. (DOC) <janelson2@DOC1.WA.GOV>; Stubbs, Yvette M. (DOC) <ydstubbs@DOC1.WA.GOV>; Wonders, Lori S. (DOC) <lswonders@DOC1.WA.GOV>; Rule, Dianna F. (DOC) <dfrule@doc1.wa.gov>; Window, Allison M. (DOC) <amwindow@DOC1.WA.GOV>; Brown, Salina M. (DOC) <smbrown2@DOC1.WA.GOV>; Brumfield, Yvonne (DOC) <ybrumfield@DOC1.WA.GOV>; Pilgrim, Heather P. (DOC) <hppilgrim@DOC1.WA.GOV>; Klemme, Risa A. (DOC) <raklemme@DOC1.WA.GOV>
Subject: Law Library Software JAWS and Magic

Good morning. This is a reminder that whether or not there is a visually impaired incarcerated individual housed at your facility, the above software must be installed and operational on one computer in each Law Library.

Effective immediately, I am requesting that the software and headphones be checked at least once a month to ensure they are operational. If they are not, please immediately submit an IT ticket to either fix the software or obtain a new pair of headphones. I am also requesting that you email me when problems arise. We have an obligation to make sure that the software is up and running when a visually impaired individual needs it.

I am hoping that this proactive approach in managing the software will eliminate the problems that arise when it is not available to the population.

Please feel free to reach out with any questions or concerns. Thank you!

Tracy Schneider, Correctional Manager

Attachment F.

Americans with Disabilities Act Accessibility

- [About](#)
- [ADA Coordinators](#)
- [Upcoming Trainings](#)
- [Resources](#)

About

The [Americans with Disabilities Act \("ADA"\)](#), a federal act signed into law by George H. W. Bush in 1990, offers protections to individuals with disabilities, including people incarcerated in state correctional systems. Specifically, Title II of the ADA states: "no qualified individual with a disability shall, by reason of such disability, be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity."

An incarcerated person is considered a "qualified individual" if they are a person who "with or without reasonable modifications to rules, policies, or practices, the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a public entity." Disability and the need for accommodations touches nearly every facet of life in a state correctional system, from the grievance procedure and classification to food and education.

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Upcoming Trainings

January

- January 16, 2020: [The ADA in Jails and Prisons: A Guide to Accommodating Inmates and Visitors with Disabilities](#)
- January 23, 2020: [ADA National Network Learning Session: Effective Communication in Health Care](#)

March

- March 26, 2020: [ADA National Network Learning Session: Accessible Medical Diagnostic Equipment and Prescription Drug Container Labels](#)




Ongoing

- [National Network ADA Training](#)




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Resources

Policies






- [DOC Policy 440.020 Transport of Property](#) 
- [DOC Policy 690.400 Offenders with Disabilities](#) 
 - [Notice of Rights for Offenders with Disabilities \(Attachment 1\)](#) 

Forms

- [DOC 13-457 Intellectual Disability Review](#) 
- [DOC 13-508 Accommodation Status Report](#) 
- [DOC 13-510 Accommodation Review Committee - Offender Notification](#) 

Training Materials

Resource Links

- [Americans with Disabilities Act Definitions](#) 
- [Accommodation Status Reports \(ASRs\)](#) 
- [Americans with Disabilities Act of 1990](#)
- [Deaf Services](#)
- [Federal Agencies and Resources for ADA](#)
- [Health Status Reports](#) 
- [Health Status Reports \(HSR\) Index](#) 
- [PULHES Codes](#) 

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Attachment G.

From: [Buth, Soknara \(DOC\)](#)
To: [Perkinson, Paige T. \(DOC\)](#)
Subject: FW: Accommodation Status Reports (ASRs) Request Form 13-508
Date: Monday, December 30, 2019 3:53:22 PM
Attachments: [ASR Protocol-3-17.pdf](#)
[13-508.docx](#)

FYI

From: Buth, Soknara (DOC)
Sent: Monday, December 30, 2019 2:28 PM
To: DOC DL HS Physicians Primary Care <DOCDLHSPhysiciansPrimaryCare@DOC1.WA.GOV>; DOC DL HS Midlevel providers Primary Care <DOCDLHSMidlevelprovidersPrimaryCare@DOC1.WA.GOV>; DOC DL HS Psych Assoc <docdlhspychassoc@DOC1.WA.GOV>; DOC DL HS Psychologists <DOCDLHSPsychologists@DOC1.WA.GOV>; DOC DL HS Facility Medical Directors <DOCDLHSFACILITYMedicalDirectors@DOC1.WA.GOV>; DOC DL HS Psychiatrists <DOCDLHSPSYCHIATRISTS@DOC1.WA.GOV>
Cc: Klemme, Risa A. (DOC) <raklemme@DOC1.WA.GOV>; Kariko, Sara S. (DOC) <sskariko@DOC1.WA.GOV>
Subject: Accommodation Status Reports (ASRs) Request Form 13-508

This message is sent on behalf of Risa Klemme, ADA Compliance Manager

As a reminder to all medical and mental health providers, accommodations not covered by HSRs are covered by the Accommodation Status Reports (ASRs). The purpose of the ASR is to provide accommodations to ensure a patient has access to programs, services or activities. ASRs are generated by the facility ADA Coordinator. If you believe your patient needs an accommodation that is not medically necessary, but medically appropriate given their diagnosis, please reach out to your facility ADA Coordinator, or to me and I will work with your facility ADA Coordinator to accomplish the task.

For your information, I have attached: DOC 13-508 Accommodation Status Report and the current ASR Protocol.

The form is also located on the Forms section of iDOC. <http://insidedoc/forms/standard/13-508.docx>

Please reach out to me with any questions or concerns.

Risa

Risa Klemme
ADA Compliance Manager

Department of Corrections
Office location:
Airway Heights Corrections Center
P.O. Box 1899
Airway Heights, WA 99001
Office: 509-244-4264
Cell: 360-789-5356
Raklemme@doc1.wa.gov

**ACCESS ASSISTANT PROGRAM
PROCEDURES**

OVERVIEW

The Access Assistant Program is a class III jobs program. The purpose of the position is to provide access to programs, services and activities for those individuals who have mobility and/or other disabilities. This is accomplished mainly by transporting persons via wheelchair to health services, programming, recreation, meals and other events. Other assistance may be provided as outlined within this procedure and its attachments.

The Superintendent will identify in writing, those staff persons who will be responsible for ensuring the requirements, including the training requirements for Access Assistants are met.

Persons hired as workers for this program will be screened, successfully complete training and sign and agree to the job expectations prior to assignment.

I. Screening and Eligibility

A. In addition to the requirements on the Incoming Transport/Job Screening Checklist, the Access Assistant:

1. Must not be identified as a potential predator on the PREA screening criteria;
2. Must not have a criminal history of offending against any person who was residing in a nursing home, mental hospital, or other non-prison institution;
 - a. Individuals who have had violence against an incarcerated person may be considered on a case-by-case basis through the FRMT process.
 - b. Persons with a criminal history of offending against any person deemed vulnerable due to age, intellectual, physical, or mental disability may be considered on a case-by-case basis through the MDT process.
3. The facility may impose other criteria and requirements for employment based on security and facility need.

II. Pre-hire Requirements

- A. Eligible individuals referred for the position of Access Assistants, must complete the following prior to being hired:
 - 1. Access Assistant Training (Attachment 1)
 - a. A wheelchair should be available at the training area so a hands-on demonstration of the parts and functions of the wheelchair can be provided.
 - b. Access Assistant Training Quiz (Attachment 2)
 - i. The Training Key Answer Sheet (Attachment 3) is not to be made available or shared with workers.
 - c. After successful completion of the Access Assistant Training Quiz, an electronic certificate will be created in OMNI by staff.
- B. The Job Expectation Form (Attachment 4) must be signed prior to performing the duties of the position.
 - 1. A new Job Expectation Form must be signed each time a worker is hired as an Access Assistant.

III. Transfers

- A. Individuals transferring to a new unit/facility who have an Access Assistant certificate on file retain their eligibility upon transfer, unless,
 - 1. Transfer is due to a disciplinary reason;
 - 2. Custody demotion;
 - 3. Transfer to a secured housing unit;
 - 4. No longer eligible per the job screening checklist, or the eligibility requirements as outlined above.

ATTACHMENTS

Access Assistant Training (PowerPoint) – Attachment 1

Access Assistant Training Quiz – Attachment 2

Access Assistant Training – Quiz Answer Key – Attachment 3 (Not for Offender Viewing)

Access Assistant Job Expectations – Attachment 4

HOW TO GET AROUND IN A WHEELCHAIR



1 Always make sure to plan your route before you set off.



2 When on the move, keep your knees, elbows and hands within the framework of the chair to prevent being hit by exterior objects.



3 In the case of being unable to navigate forward down a narrow hallway, try approaching in a reverse position.



4 Ensure you are sat upright and comfortable in the wheelchair, with your back straight and feet firmly on the pedals.



5 To turn quickly, rotate the wheelchair on its axis and move one wheel forward and the other in reverse.



6 To execute tight turns, remove the front pedals to shorten the length of the wheelchair and use extra leg strength to execute the turn.



7 Pass smoothly through doorways by first opening the door then lean slightly towards the door, letting it rest against your shoulder to prevent it from hitting your pushing hand.

If you don't wear a **seatbelt**, you're going to need all the help you can get.

www.buckleupintheback.com

JOB EXPECTATIONS

Access Assistant

Name: _____ DOC #: _____

Duties: As an Access Assistant you may be asked to provide assistance in the following areas: (The check marked boxes indicate which duties you are required to assist with).

- Push via wheel chair to call outs, mainline, and functions outside of the living unit as requested.
- Assist with handling meal trays, books or other materials.
- Read call outs, assist with homework and/or writing.
- Assist with basic cell cleaning under direct supervision by staff.
- Ensure oxygen tank is secure.
- Assist blind/low vision individuals navigate the facility by providing voice cues or lightly grasping their elbow
- Other _____

Expectations: You are required to follow the expectations listed below at all times:

- Check in with Supervisor at beginning and end of each work shift.
- Be courteous and polite to the individual you're assigned to assist.
- No racing or tipping wheel chairs, all wheels remain on the ground at all times.
- You are not allowed to use any of the assistive devices for yourself (wheelchair, cane or other equipment).
- Complete tasks assigned by staff when requested.
- Assist individuals as directed by staff to get to and from call-outs (e.g. Medical, property, education, Religious Activity Center (RAC), mainline, visiting, etc.)
- Immediately report any damage to mobility equipment to your Supervisor or available staff.
- No lifting, pulling, or touching your assigned individual, unless directed by staff or as noted above.
- If you receive a major infraction, you will be terminated from your job. Minor infractions will be reviewed on a case by case basis and may also be grounds for termination.
- You are not to request, accept or receive any items/property or other form of payment for work performed from the individual you are assisting.
- Upon discovery of any blood or body fluid, immediately notify your supervisor or staff and follow their direction.

If you are directly assigned a specific individual to assist, their information is provided below:

Name:	DOC #:	Unit/Cell #:
-------	--------	--------------

Access Assistant Signature

Date

Staff Signature

Date

ACCESS ASSISTANT

QUIZ

DATE: _____

NAME: _____ DOC #: _____
Print

1. A main function of your job is to assist individuals with disabilities who need access to programs, services and activities.
 - a. True
 - b. False

2. If a wheelchair user has a cane, the cane should be stowed:
 - a. On the back of the wheelchair
 - b. The wheelchair user should hold it during transport
 - c. You should hold it during transport

3. When you transport a person to their call-out appointment you should:
 - a. Return immediately to your unit after arriving at the destination.
 - b. Wait with the person you transport until directed by staff.
 - c. Leave if the weather is good or if there are a lot of staff around.

4. Some of the duties you may be asked to do include (check all that apply)
 - a. Assisting with Handling meal trays, books or other materials
 - b. Reading call-outs
 - c. Ensuring oxygen tank is secure
 - d. Guiding a visually impaired person
 - e. Picking up their issuable medications for them

5. It is ok to use someone's cane if they give permission.
 - a. True
 - b. False

ACCESS ASSISTANT

QUIZ

DATE: _____

NAME: _____ DOC #: _____
Print

6. In the event of an emergency evacuation you are expected to assist in the evacuation of individuals with disabilities.
- a. True
 - b. False
7. It is ok to assist someone to transfer from their wheelchair to a chair or a bench.
- a. True
 - b. False
8. If you notice the wheelchair is broken or not working properly, you should:
- a. Try to fix it first before you say anything
 - b. Immediately tell your supervisor or staff
 - c. Not say anything because it is the wheelchair user's responsibility
9. Persons with intellectual disabilities may have problems with: (check all that apply):
- a. Thinking clearly
 - b. Problem solving
 - c. Memory
 - d. Persons with intellectual disabilities rarely have memory problems
10. If you are writing something for someone who is blind or low vision:
- a. Write it exactly how they say it – verbatim
 - b. Just get the general idea down on paper
 - c. Use some of their words but add in your ideas too.
11. If someone is hard of hearing yell loudly so they hear better
- a. True
 - b. False

ACCESS ASSISTANT

QUIZ

DATE: _____

NAME: _____ DOC #: _____

Print

12. If someone is deaf or hard of hearing covering your mouth when you talk makes it harder for them to understand you.

- a. True
- b. False

13. Which of the following statements are true regarding oxygen tank safety? Check all that apply.

- a. It is ok to touch or adjust the oxygen bottle/canister
- b. If the canister is not secured, notify staff immediately
- c. Do not bounce or jostle the oxygen tanks when you operate a wheelchair

14. You should always set the brakes on the wheelchair when stopped:

- a. True
- b. False

15. You can use the brake to help stop you if you go down fast on an incline.

- a. True
- b. False

Total Score: _____

Passed: Yes No



Staff Signature: _____ Date: _____



STATE OF WASHINGTON
DEPARTMENT OF CORRECTIONS
P.O. Box 41123 • Olympia, Washington 98504-1123

December 30, 2019

TO: All Health Services Staff

FROM: Mary Jo Currey, Assistant Secretary, 
Dr. Sara Kariko, Chief Medical Officer, 

SUBJECT: Hearing Aid

Hearing care is an essential component of medically necessary care provided by DOC Health Services. Incarcerated individuals living with hearing impairment require quality and timely hearing care to function in the prison environment and access appropriate programming.

Recently revisions were made to DOC policies and procedures that govern the provision of hearing care. First, the [Hearing Aids and Pagers](#) protocol was recently revised to clarify coverage of hearing aid replacement, which is now authorized **every five years or sooner** if the hearing aid is lost or irreparable.

Additionally, the Washington DOC Health Plan section on hearing care is in the process of revision and will specify that hearing aid repair or replacement are covered if they meet the [Washington Medicaid coverage guidelines](#):

L. Hearing Care

- Hearing screening will be performed upon intake into the correctional system with the initial physical examination.
- Hearing assessments are provided when medically necessary.
- Hearing aids are provided when medically necessary, as defined in the attached Levels of Care Directory.
- Lost or damaged hearing aids will be replaced or repaired on a case-by-case basis only if the need for replacement is not due to the patient's carelessness, negligence, deliberate intent, or misuse per [Washington Apple Health \(Medicaid\) guidelines](#).
- Patients may be required to pay for the cost of replacement or repair in cases of willful or negligent damage, destruction, or loss of hearing aids.

December 30, 2019

Hearing Aid

Page 2 of 2

- Cleaning of hearing aids is the responsibility of the patient and should be performed per manufacturer recommendations.
- Servicing and repair of hearing aids are authorized as level 1 to maintain the proper functioning of the device and in accordance with the [Washington Apple Health \(Medicaid\) guidelines](#).

MJC:FJL:jl

cc: Stephen Sinclair, Secretary
Office of Corrections Ombuds



PATIENT NAME:	
DOC NUMBER:	DATE OF BIRTH:

INTELLECTUAL DISABILITY REVIEW

DATE	FACILITY
------	----------

1. **How many serious infractions does the offender have?** Include circumstances surrounding the infractions in your answer.
2. **How often has the offender moved?** Include any background information and reasons for movement in your answer.
3. **Does the offender have difficulty understanding or answering questions?** Include any situations that appear to be more difficult in your answer.
4. **Is the offender easily distracted?** Include any situations that contribute to the distractions or actions that can alleviate distractions in your answer.
5. **Does the offender have difficulty remembering instructions/tasks?** Include any situations that make remembering more difficult or easier in your answer.
6. **Does the offender use immature coping methods such as withdrawal or tantrums?** Include circumstances surrounding these instances in your answer.
7. **Does the offender try hard to please others?** Include a description of applicable behavior in your answer.
8. **Is the offender easily influenced by others?** Include any applicable situations in your answer.
9. **Does the offender need guidance to complete tasks such as cell cleaning, laundry, etc.?** Include any applicable situations and types of guidance needed in your answer.
10. **Is the offender able to advocate for themselves?** Include any applicable situations and responses given in your answer.
11. **Does the offender need help in reading, writing, and preparing documents?** Include type of help needed in your answer.
12. **Can the offender tell time?** Include any attempts or types of errors at time-telling in your answer.
13. **Does this offender have a history of substance abuse?** Include history and substances in your answer.
14. **What Programs does the offender attend?** Include a brief description of the program and any challenges encountered in your answer.



PATIENT NAME:	
DOC NUMBER:	DATE OF BIRTH:

INTELLECTUAL DISABILITY REVIEW

DATE	FACILITY
------	----------

- 15. Has the offender participated in educational programming?** Include a brief description of programs, participation, and outcomes in your answer.
- 16. Does the offender have a job?** Include a brief description of the job and any challenges encountered in your answer.

Completed by: _____
CLASSIFICATION COUNSELOR PRINTED NAME and SIGNATURE

Distribution: **Original** – Health Record **Copy** – Classification Counselor

State law and/or federal regulations prohibit disclosure of this information without the specific written consent of the offender to whom it pertains, or as otherwise permitted by law.



Attachment K.



STATE OF WASHINGTON
DEPARTMENT OF CORRECTIONS
P.O. Box 41123 • Olympia, Washington 98504-1123

December 30, 2019

TO: All Health Services Staff

FROM: Mary Jo Currey, Assistant Secretary, 
Dr. Sara Kariko, Chief Medical Officer, 

SUBJECT: PULHES Coding

Accurate PULHES coding is an essential aspect of the clinical care provided by DOC Health Services as it is the primary method used to communicate the overall health needs of incarcerated individuals to DOC prisons and classification staff. PULHES codes provide the best placement and access to programming for incarcerated individuals and ensure that during transfer decisions, DOC staff have accurate PULHES codes to ensure that the incarcerated individuals transfer to a facility that can meet their health needs.

During a recent review of Washington DOC's compliance with the Americans with Disabilities Act reports of inaccurate PULHES coding were noted. In order to improve accuracy of PULHES codes and ensure proper facility placement and access to programs and health care for incarcerated individuals all DOC Health Services staff in a position requiring assignment of PULHES codes should review the linked PULHES coding guideline. Specific criteria for assigning codes as well as which codes are accepted at each facility are detailed on pages 3 – 11 in the Health Services Departments [PULHES CODING GUIDELINES](#).

Additionally, as required by both the PULHES guideline and [DOC Policy 610.650 Outpatient Services](#), PULHES codes should be reviewed and updated when applicable during all patient encounters.

Thank you for your assistance in improving the care provided to DOC's incarcerated individuals.

MJC:FJL:jl

Cc: Stephen Sinclair, Secretary
Office of Corrections Ombuds

“Working Together for SAFE Communities”

Attachment L.

QUESTIONNAIRE CONCERNING ADA

QUESTION	RESPONSE	NOTES
Is the ADA Compliance Manager position a full-time position?		
Would you be willing to share your job description that describes your duties?		
Do you supervise any staff? If so, what are their positions?		
Do you have a Policy concerning Offenders with Disabilities or similar topic? Would you be willing to share your policy?		
Do you have a full-time position dedicated to deaf incarcerated persons?		
Does your state have ADA Coordinators at each correctional facility? If not, how many do you have in total state-wide?		
Are the ADA Coordinators for each facility full-time or part-time?		
Do your ADA Coordinators have a job description or other document that describes their duties? If so, would you be willing to share this document describing their duties?		
How many training hours of ADA training do you require each year for your ADA Coordinators? Do you provide the training or is it provided by other agencies?		

Your name: _____ Title: _____

State DOC Organization: _____