



STATE OF WASHINGTON
DEPARTMENT OF CORRECTIONS
OFFICE OF THE SECRETARY
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November 1, 2022

Caitlin Robertson, Ph.D.
Director, Office of the Corrections Ombuds,
Office of the Governor

Dear Dr. Robertson:

The Washington Department of Corrections (DOC) would like to provide a written response to the Office of Corrections Ombuds 2022 Annual Report.

The DOC recognizes the important role the Office of Corrections Ombuds (OCO) plays addressing concerns of those in our care and custody, their families and the public in general. The department is committed to working in partnership with the OCO to improve its delivery of correctional services. The DOC also appreciates the direct and open communication by which the OCO interacts with the department while carrying out this important work that advances a safe and humane corrections system.

Some notable efforts of this past year include; increasing health care access, [retaliation prevention efforts](#), [systemic mail process and policy improvements](#), [transgender, intersex, and gender non-conforming policy and practice improvements](#) and the [incarcerated individual betterment fund \(IIBF\) process reviews](#).

Over this past year, routine meetings have occurred with the OCO that have included internal partners and external stakeholders for the purpose of reviewing recommendations and creating plans of action amidst an ever-changing environment. The department prioritizes resolving agreed upon plans of action based on recommendations provided by the OCO.

While many issues have been resolved this year, there are areas that require work. The following items remain a focus for the department and are mentioned in the annual report by the OCO as unresolved. The department is committed to continued action to resolve these remaining areas of work, some of which require ongoing and additional resources.

Betterment Fund

“Several of the recommendations were addressed by the department. However, this office’s recommendation to “[c]reate better accountability for IIBF through regular oversight review of detailed IIBF expenditure transactions by the IIBF Administrator” has not been addressed.”

“Working Together for SAFER Communities”

Beginning in November 2022, the Department will begin conducting targeted, unannounced monthly audits at facilities and at DOC Headquarters. At the local facility level, business advisors will conduct random audits on several transactions per month. At the headquarters level, the Incarcerated Individual Betterment Fund (IIBF) Administrator will conduct monthly audits of random transactions from each DOC facility. These audits will ensure purchases were made consistent with policy and approved state purchasing guidelines.

Mental Health

“DOC should ensure that staff conducting mental health screenings have caseloads that allow for thorough review of each case and that screenings and assessments occur in suitably confidential areas.”

The department has asked for additional funding to address caseload size and we are hopeful that this will be available in the future. With regard to confidential interview space, in June of 2021, an assessment of confidential interview spaces was conducted. Health Services leadership was given a copy of this assessment and tasked with creating a plan for securing confidential spaces. In 2022 the department received funding for a triple-wide trailer to be provided adjacent to the health services building at three facilities, including WCC. These trailers are currently in the design phase for implementation.

In the time since the initial recommendation, the DOC Health Resources Team has undertaken the transition of “care on demand” to a new model of care, the patient-centered medical home model, and is preparing for a transition to electronic health records which has taken priority over this effort. However, the department continues to utilize existing confidential space. The department also has a capital budget request to remodel the men’s reception center which will include additional confidential space for mental health assessment and interviews.

“DOC should ensure that an individual’s mental health status is considered throughout the disciplinary process, including when reviewing infractions, determining guilt, and imposing sanctions.”

DOC agrees with and is in process of fulfilling this recommendation. A pilot program was completed in December of 2021, for a new disciplinary process at the Washington Correctional Center for Women (WCCW). At the beginning of calendar year 2022, data from this program was compiled and incorporated into a new policy. The most significant change from this initial pilot is that all infractions now go through the disciplinary hearings process. The disciplinary hearings officer is required to consider mental health factors when an incarcerated individual is found guilty and may alternate sanctions. The second pilot started in April of 2022 and is scheduled to be completed by the end of the calendar year. Data and survey results from this pilot will be used for further possible revisions to the disciplinary process.

“DOC should develop comprehensive policies that address Residential Treatment Units (RTUs)”

Due to outbreaks of, COVID-19 across facilities, the Residential Treatment Unit (RTU) workgroup has been unable to reconvene since January of 2020. In April of 2022, a new health services project manager was assigned this project. However, this staff member has transitioned into another career opportunity and the department is again recruiting for a replacement. The department expects there will be policy development as the new project manager redevelops the program with the new RTU communities in CY 2023.

“DOC should develop comprehensive policies that address... Individual Behavior Management Plans (IBMPs)”

The Managing Challenging Mental Health Patient Protocol was updated in June 2021 to advance the multi-disciplinary approach to the Individual Behavior Management Plan process. The department developed guidelines for incentives to be used to improve standardization across facilities. Department Psychologists 4s were trained and updated on the new protocol. The department will include policy revisions as identified as appropriate in upcoming review cycles.

“DOC should develop comprehensive policies that address... Individuals in violator status”

DOC has updated protocols and processes for those in violator status, including the process to monitor people in drug withdrawal or detoxing. The department recognizes this recommendation as an ongoing need and will continue to request additional resources through the budgeting process to advance this work.

“DOC should reduce the frequency of placement and length of stay in any segregated housing for individuals with mental health conditions.”

Work continues to be done to advance several promising pilot projects, such as the transfer pod project, that provides alternatives to restrictive housing and allow incarcerated individuals to be provided alternatives to transitional housing out of traditional restrictive housing. These pilots provide a least restrictive environmental alternative within existing infrastructure and safety concerns. More work has been prioritized to increase the amount of transfer pods and the enhanced closed custody cells, both of which allow for 4 or more hours of out-of-cell-time, and include congregate activities, with reduced restraints use. The department has developed 112 of the 200 transfer pods and enhanced close custody beds statewide, working to get to 200 as soon as possible, pending additional resources and space.

“DOC should provide additional mental health and de-escalation trainings to staff to increase positive and effective engagement with individuals who have mental health conditions.”

In calendar year 2021, the DOC developed a plan to provide voluntary mental health first aid training to correctional officers at Monroe Correctional Complex (MCC) Intensive Management Unit and MCC-Special Offender Unit. The department received Institutional Review Board (IRB) approval for the mental health training at Monroe in January of 2022. To date, 30 correctional officers were able to participate in the training during calendar year 2022. The training has received positive feedback from participants and the DOC is currently putting forth a funding request to train all mental health first aid restricted housing staff.

Administrative Segregation

“DOC should create a hard deadline that persons must be released from solitary confinement within 30 days, whether through release to general population, transfer, or transition to a housing pod that allows for improved conditions.”

The expectation that incarcerated individuals are released from administrative segregation within 30 days already exists in policy.

Reducing the allotted 30-day time frame for all restrictive housing of those in Intensive Management Unit (IMU) status and Protective Custody (PC), regardless of individual circumstance, is not a recommendation the DOC can agree to due because of the commitment to protect staff and the population of incarcerated individuals. It is, however, our goal to encourage staff to strive for a 14-day maximum administrative segregation stay while the department is able to gain more full-time staff and department funding to support additional restrictive housing options. The department is currently expanding existing alternatives such as transfer pods and enhanced closed custody to ensure that there are other restrictive housing options that provide options outside of solitary confinement. Currently the department has secured funding for 9 full-time employees to allow moving maximum custody individuals to allow individuals up to 4 hours of out of cell time per day. The department is committed to working with the Governor’s office, the Legislature, and others to advance the reduction of the use of restrictive housing.

In closing, the department hopes these updates shed light on our commitment to operate a safe and humane correctional system and to partner with the OCO and others to transform lives for a better Washington. The agency is focused on proactively improving the lives for those we house, their loved ones, and the staff who work within our correctional facilities. While there are obstacles that will undoubtedly be in place, the Washington DOC will continue our work with the OCO and other internal and external stakeholders to overcome these obstacles and move forward in the coming year.

Thank you.



Cheryl Strange
Secretary