



STATE OF WASHINGTON
DEPARTMENT OF CORRECTIONS
P.O. Box 41100 • Olympia, Washington 98504-1100

August 12, 2021

Joanna Carns
Office of Corrections Ombuds
2700 Evergreen Parkway NW
Olympia, WA 98505

Dear Ms. Carns:

The Washington Department of Corrections (DOC) appreciates the opportunity to respond to the Office of Corrections Ombuds' (OCO) June 2021 "Transgender, Intersex, and Gender Non-Conforming Systemic Review" report. As noted in the report, information for the review was received "from 2019 through early 2021."

While the department is somewhat limited in its ability to respond to items presented in the OCO's report due to "on-going policy and protocol negotiations with the Trans In Prisons (TIP) Justice Project of Disability Rights Washington (DRW)" as noted in the OCO report, the department did want to provide the following information as support for the ongoing progressive efforts by its administration and staff throughout the state as well as to highlight the identified specific concerns and/or feedback, many of which appear to be historic with improvements in many areas in the most recent four years.

INTRODUCTION

The DOC's values include cultivating an environment of integrity and trust, respectful and inclusive interactions, people's safety, positivity in words and actions, and supporting people's success. As such, there has been much work done in recent years to increase efforts in equity, diversity, inclusion, and respect, as well as in ensuring specialized populations are treated fairly and equitably.

According to the United States Department of Justice (DOJ) Office of Justice Programs (OJP), Office for Victims of Crime (OVC), "the most common estimates" of the transgender population in the United States is 0.3 to 3.0 percent, and that between 0.5 and 1.0 percent of the population have a medical condition that falls under the intersex umbrella. The percentage of the DOC population that currently self-identifies as transgender, intersex, or gender non-confirming is just over 1.1 percent¹. This suggests that the DOC prison population mirrors the general population.

Beginning in 2017, the DOC began working on creation of an agency-wide policy

¹ https://ovc.ojp.gov/sites/g/files/xyckuh226/files/pubs/forge/transgender_numbers.html

regarding the housing and supervision of transgender, intersex, and gender non-conforming individuals under the jurisdiction of the agency. This was a coordinated effort between the DOC, labor partners, and DRW, and included reviewing nationally accepted best practices (at the time) for how they could be implemented in Washington state facilities. As is the case with any brand-new policy, there have been gaps and inconsistencies identified, and the next policy update will include many changes, to include updated processes and forms to be in better alignment with other policies and practices.

The department acknowledges that best practices continue to evolve around the unique needs of these populations. There have been many updates to practices and protocols over the past several years, prior to the DOC's work with external agencies. For instance, property items for transgender individuals have been topics of meeting discussions since at least 2015, with current practice allowing for items such as makeup and hygiene items to be ordered for any individual housed at any facility, which is a vast difference from just six short years ago.

This change in policy, practice and culture has been recognized by individuals that have been housed in Washington state prisons facilities on numerous occasions as noted by correspondence received. One example was a kiosk message received in May 2021 by an individual housed at Monroe Correctional Complex, which stated, "I as a trans inmate would love to thank you and DOC in general with the progress that has been made with policies for us trans inmates since my last release from TRU in 2018. Keep up the good work. Thank you."

The department has been identified consistently by the DOJ PREA Resource Center as an agency demonstrating best practices in trainings and presentations for the way it has implemented and improved upon PREA practices over the years. It is important to note that the DOC provides annual PREA reports on its external website at <https://www.doc.wa.gov/corrections/prea/resources.htm#reports>. These reports, dating back to 2013, show clear progression in how the agency has worked to advance its practices regarding PREA in general, as well as with the transgender, intersex, and gender non-conforming populations. Additionally, all department prisons and work releases are subject to federal PREA Audits conducted by a formally DOJ-certified auditor every three years, beginning in 2014. To date, 28 prison audit reports and 29 work release reports have been finalized, all of which have final reports indicating 100% compliance with all DOJ PREA standards and can be found at the same link noted above. This is a testament to the ongoing dedication by the department to ensure the sexual safety for all individuals in prisons and work releases in Washington state.

It is noteworthy that the last DOJ PREA Audit for the Washington Corrections Center for Women (WCCW), finalized on June 10, 2020, WCCW was found to have "exceeded" the provisions of DOJ PREA Standard 115.42, Subsections (c), (d), and (e), which directly relate to the housing placement and programming assignments for those individuals who identify as transgender or intersex².

² <https://www.doc.wa.gov/corrections/prea/docs/audit-2020-prison-wccw.pdf>

Within the past four years, the DOC transferred the first trans man from WCCW to a men's prison and, within the past 18 months, transferred the first trans woman from a men's facility to WCCW. Additionally, approximately two years ago, the DOC saw its first individual who had previously been housed in men's facilities during previous incarcerations now being housed at the women's facility upon re-admission.

Providing education to staff about the unique and sensitive needs of these populations are integral to the department's success. As such, the department has contracted with two separate consultants specifically to work with the staff and incarcerated population at WCCW since that facility appears to have the current highest need. One consultant has provided training and facilitated discussions specifically with health services staff and management teams, and the other has recently began providing "Transgender 101" type facilitated training discussions with WCCW line staff in two-hour increments with the goal of providing these discussions with all WCCW staff by the end of 2021. These Transgender 101 discussions are being scheduled to accommodate line staff on all shifts and in all job categories.

The department will continue to work with stakeholders, both internal and external, to ensure the safety of all under its jurisdiction, and to continue to be progressive in its handling of specialized populations.

OCO REPORTED CONCERNS & SYSTEMIC FEEDBACK

1. *Transgender women report being housed at prisons for men and feel they cannot honestly report when they are unsafe in that setting. They also reported being targeted and harassed after coming out as trans and/or non-binary.*

A. Since the onset of the federal Prison Rape Elimination Act (PREA) in 2003, DOC has provided individuals multiple venues to report safety and PREA concerns. Currently:

1. Reports can be made verbally to any staff
2. Reports can be made via third party
3. Reports can be made via the resolution process
4. Reports can be made in writing
5. Reports can be made via the toll-free hotline
6. Reports can be made to external agencies, to include DOC's contracted third-party reporting agency, the Colorado Department of Corrections

** All reports can be made anonymously

** All reports are thoroughly investigated

B. All individuals who self-report to be transgender, intersex, and/or gender non-conforming receive twice-yearly housing and programming reviews.

1. Upon an individual's initial disclosure of transgender, intersex and/or gender

non-conforming identity at a facility, a facility Multidisciplinary (MDT) Review Committee meets every six months to conduct a housing and programming review (*DOC 02-384 Housing Protocol for Transgender, Intersex, and Gender Non-Conforming Individuals* and *DOC 02-385 Housing Review for Transgender, Intersex, and Gender Non-Conforming Individuals*) to consider factors such as risk for victimization or predation, medical or mental health concerns, security considerations, and the individual's own views regarding their safety. The facility MDT includes representation from facility management, the PREA Compliance Manager/Specialist, assigned counselor, and representatives from both medical and mental health. The MDT makes their recommendation to HQ whether to retain the individual at the current facility, or to transfer to another facility. If the recommendation is to retain and there are no concerns noted, the facility submits *DOC 02-385 Housing Review for Transgender, Intersex, and Gender Non-Conforming Individuals* to HQ. HQ will then review and approve the MDT's assessment, and no further action is taken until the next biannual review.

2. If a transfer to any other facility is recommended, regardless of whether to a men's or women's facility, the facility first confers with HQ Classification to determine placement options without keep separates, prohibitions, and that can meet medical and/or mental health needs, and will submit *DOC 02-384 Housing Protocol for Transgender, Intersex, and Gender Non-Conforming Individuals* to HQ.
3. If the recommendation is to transfer to a like-facility (for instance, from one men's prison to another), HQ will review the request, and if supportive, will forward the form to the receiving facility, which will hold its own MDT (to include the individual via phone/virtual attendance) to discuss issues such as showering options, and any concerns. The receiving facility will complete their portion of the form and return it to HQ. HQ will then approve or deny transfer and finalize the decision.
4. If the recommendation is to transfer from a men's prison to a women's prison, or vice versa, the HQ MDT will meet to review the case. The HQ MDT is chaired by a Deputy Prisons Director, and includes DOC's Chief Medical Officer, Chief of Psychiatry, Director of Mental Health, Security Operations Program Manager, and PREA Coordinator, and may include Superintendents of both the sending and potential receiving facilities. The group reviews programming history, infraction history, involvement with medical and mental health practitioners, how long an individual has identified and/or lived as a transgender individual, participation in hormone replacement therapy and/or other transitional treatment plans, federal legal requirements, past housing while in other confinement jurisdictions, risk of vulnerability or predation, and several other factors.
5. The HQ MDT then completes *DOC 02-422 Transgender, Intersex, and Gender Non-Conforming Housing Multi-Disciplinary Team*, which includes decision of the HQ MDT. Additionally, the HQ MDT Chair then completes *DOC 02-385 Housing Review for Transgender, Intersex, and Gender Non-Conforming Individuals* with final housing determination. If a transfer is approved,

consideration is also given to potential needs such as single cell assignment, particular housing unit/area, etc.

** There have been HQ MDTs that result in denial of transfer requests; there have been HQ MDTs that result in approval of transfer requests. Each case is reviewed independently and separately. No decision is made lightly.

2. *Transgender and gender non-conforming persons report being disproportionately placed in restrictive housing, such as solitary confinement or close observation areas.*
 - A. The department clearly understands that transgender individuals are at a higher risk for sexual victimization, as noted by the PREA Resource Center, Vera Institute of Justice, National Institute of Corrections, and other respected organizations. As such, DOC takes housing of these individuals seriously to ensure the safety of all.
 - B. The DOC has been completing twice-annual housing reviews to ensure safe and appropriate housing since 2014.
 - C. Per DOJ PREA Standard 115.43(a), those at high risk for sexual victimization shall not be placed in involuntary segregated housing unless an assessment of all available alternatives has been made, and a determination has been made that there is no available alternative means of separation from likely abusers. Further, DOJ PREA Standard 115.43(c) indicated the facility shall assign such individuals to involuntary segregated housing only until an alternative means of separation from likely abusers can be arranged, and such an assignment shall not ordinarily exceed a period of 30 days. There are also requirements that must occur if such housing is determined to be the only option available until there is no longer such a need for separation.
 - D. Per DOC Policy 490.820 PREA Risk Assessments and Assignments, if a transgender individual arrives at a facility without an approved housing determination, they will be housed in the facility infirmary or extended observation area until housing determination is made to ensure safety. PREA risk assessments are completed within 72 hours of intake to all department facilities. However, an individual who indicates they feel safe in general population via the DOC Preferences Form may be allowed to be housed in general population pending final housing determination with approval of the Prisons Deputy Director. To date, no requests for housing in general population have been denied by the Prisons Deputy Director.
 - E. At any time, an individual can request protective custody by providing a written confidential statement. Those individuals would be placed into administrative segregation pending investigation into their concerns, per DOC Policy 320.200 Administrative Segregation.
 - F. As noted by a transwoman who has been housed in several Washington facilities and is currently housed in a men's facility, "My experience has been good. I feel safer than I ever have here. I've seen many improvements over the years. DOC has worked hard to create protocols and has come a long way."
3. *The gender dysphoria assessment through DOC mental health services is lengthy and*

the standards for evaluation are unclear.

- A. The evolution of knowledge and skills of the mental health and psychiatric staff at the department has come a long way in recent years. Through consultation with community subject matter experts, department processes have been revised and refined to better meet the needs of the population. This has included sending a department psychologist through a certification program in Transgender HealthCare to provide internal expertise.
 - B. Since 2018, there has not been a requirement of medical necessity associated with a diagnosis of gender dysphoria required for treatment with Hormone Replacement Therapy (HRT). At many locations, the Primary Care Provider will prescribe HRT without a consultation from mental health providers. At those locations where a mental health consultation is requested, the process is much more streamlined than in the past with a focus on confirming a person's identification as transgender without having to meet criteria for gender dysphoria.
 - C. The department utilizes consultation from a psychologist in the community to assess a person's readiness for gender affirming surgery and if they meet criteria for medical necessity, consistent with HCA guidelines.
 - D. A person's appearance is not considered during this assessment nor is it a criterion for accessing services.
4. *Incarcerated individuals report inadequate mental healthcare for gender dysphoria, anxiety, depression, and other mental health needs. OCO received several reports of individuals experiencing suicidal ideation, suicide attempts, and self-harm.*
- A. Mental health staff at DOC are skilled in the assessment and treatment of mental health concerns. When a patient presents or is referred for services, the therapist works with them to understand their concerns and treatment needs. There are opportunities for consultation with supervisors and subject matter experts if a therapist needs additional support to provide the most effective care for an individual.
 - B. There have been various training opportunities over the past several years to improve the knowledge and skills of the MH staff working with our transgender population. Our staff are increasingly able to help those experiencing distress associated with being transgender. We are in the process of identifying specific individuals at each major prison who will participate in a consultation group to support their work with transgender clients.
 - C. Thoughts of self-harm and suicide are taken very seriously by the department, and thorough assessments of such symptoms are conducted when made known.
5. *Patients report delays in access to hormone replacement therapy (HRT), gender affirming surgery, and other gender-responsive healthcare. They also report not receiving adequate follow up appointments, monitoring, and timely lab work once starting HRT.*
- A. The health care protocol revisions will address many of the concerns noted above to

- include schedules for follow-up lab work and other monitoring.
- B. The DOC takes self-harm very seriously and will intervene immediately when aware of a person's distress.
 - C. Steps are being taken to standardize the care provided from both medical and mental health staff.
6. *Trans individuals report not being provided strip searches by staff of the gender identified on their preference form, as required by both DOC policy and the Department of Justice PREA Standards.*
- A. Historically searches are conducted according to DOC Policy 420.310 Searches of Offenders (published 2014). According to the policy guidelines strip searches of incarcerated individuals are conducted by male staff in male facilities and female staff in female facilities in accordance with DOJ PREA Standard 115.15.
 - 1. In February of 2020, the DOC implemented DOC Policy 490.700 Transgender, Intersex And/or Gender Non-Conforming Housing and Supervision which provides the trans population the ability to identify the gender of the staff member they prefer to be searched by, if available.
 - 2. To ensure compliance with DOJ PREA Standard 115.15, staff training was developed to train employee volunteers to conduct searches of transgender individuals.
 - 3. In March of 2020, the DOC suspended all staff training to mitigate risk associated with COVID-19. Although the curriculum was made available, only a minimal number of staff received training prior to the suspension of staff training.
 - 4. Some training of employee volunteers was completed in 2020 prior to the enactment of department wide training restrictions. As training restrictions have lifted, the number of staff trained to conduct searches according to an individual's gender continues to increase.
 - 5. As staff training efforts continue, the DOC remains in compliance with DOJ PREA Standard 115.15 by requiring staff to document and report all searches that occur not in accordance with preferred gender.
 - 6. In addition, the DOC continues to seek information regarding best practices from the National Institute of Corrections, the department of Justice PREA Resource Center, and other state corrections agencies to develop a revised and more progressive search policy. It is the DOC's intent to provide a search process consistent with security needs and humanistic values, and which respects the dignity and privacy of all incarcerated individuals. The DOC expects to fully update DOC 420.310 Searches of Offenders with revised guidelines and publish a new policy once negotiations with Disability Rights of Washington are complete.
 - B. The DOC remains in compliance with DOJ PREA Standard 115.15. The DOJ [PREA Resource Center](#) does not specifically direct female staff to search transwomen or male staff to search transmen. However, the department is committed to transforming search guidelines and agency culture necessary to

conduct searches based on the identified gender rather than the biological sex of a transgender person and will continue collaborative efforts to develop formal policy and associated guidelines with internal and external stakeholders.

- C. Per DOJ PREA standards, all staff are required to be trained in conducting searches of transgender and intersex individuals in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs. The DOC does this and has been found to be compliant in every DOJ PREA Audit to date in this area.
7. *Prisoners report experiencing anti-trans discrimination and targeted harassment by DOC staff, as well as lack of assistance when they are targeted and/or harassed by other incarcerated persons.*
- A. The department's Resolution Program (previously known as Grievance Program) underwent a complete evaluation via a co-chartered workgroup with the OCO starting in 2019, and included stakeholders from Disability Rights Washington, Statewide Family Council, OCO, DOC, and formerly incarcerated persons. The results of that workgroup included an updated Resolution Program policy and Resolution Program Manual (RPM) in 2021.
 - B. The DOC recognized there had been a historical gap in identifying concerns brought forth that may or may not have met requirements for investigation under the DOJ PREA standards, which led to individuals' concerns not being investigated appropriately.
 - C. In the 2021 update, the RPM now clearly defines what resolution requests are unable to be processed through the Resolution Program and must be referred as a PREA allegation.
 - D. For those requests referred as a PREA allegation that are determined to not meet DOJ PREA standards for investigation, the RPM instructs the individual is to submit a new Resolution Request with the written notification received by the PREA Compliance Manager/Specialist, and their concern will be processed and handled in accordance with the Resolution Program guidelines.
 - E. This process was put into place to ensure PREA reports were handled appropriately and was vetted through the national PREA Resource Center.
 - F. For example, DOC Policy 490.700 Transgender, Intersex, Gender Non-Conforming Housing and Supervision requires employees/contract staff/volunteers to use an individual's preferred pronoun (when known) or their last name. A staff person's failure to use an individual's preferred pronoun (when known) is not a violation of DOJ PREA standards and therefore would not be investigated as a PREA complaint; however, a staff person's failure to use an individual's preferred pronoun (when known) or their last name would be considered a violation of policy and therefore accepted as a Resolution Request. If the actions are found to have merit and could result in disciplinary action against the employee/contract staff, the Appointing Authority is immediately notified to determine whether a separate administrative review is warranted. The individual will be notified of this, as well as of any outcomes of such a review.
8. *Transgender and gender nonconforming individuals reported facing burdensome*

restrictions on otherwise normal friendships and feel their interactions are often sexualized by DOC staff, increasing their sense of isolation.

- A. The department values people's safety, respectful and inclusive interactions, positivity in words and actions and supporting people's success. Staff are encouraged to communicate with the incarcerated population if they observe potentially harmful or risky behavior or actions taking place. Behavior observations are recorded to share information with staff and maintain continuity of staff communication. We acknowledge more focused training needs to occur in order to educate staff on best practices for communicating with and understanding the needs of the transgender population. We also anticipate as training efforts continue and policies are put into place, communication will be better delivered by staff and better received by the transgender population.
 - B. DOJ PREA standards and an obligation to report observations and/or confidential information can create unintended adverse impacts. DOC investigates PREA related reports according to DOJ PREA standards with the intent to ensure the incarcerated population remains safe and is not subjected to sexual violence. DOC acknowledges staff have a heightened awareness to reporting and preventing PREA related incidents and will encourage staff to continue to positively communicate concerns directly with the population whenever possible to prevent unnecessary restrictions while carefully following all reporting, response, and prevention standards.
9. *DOC staff misgender individuals and use incorrect pronouns, including in witness statements, medical & mental health reports, BOEs, and their own database tracking.*
- A. The department expects all staff to be respectful and professional in their interactions and communications, both verbally and in writing.
 - B. In attempts to be respectful, at a male facility for instance, staff may refer to an individual as "Mr. X". However, once notified that the individual prefers to be referred to as "Ms. X," the expectation is that staff will refer to the individual as such, or by their last name only. At larger facilities where staff may interact with hundreds of individuals on any given day, it would not be unusual to sometimes forget the request to refer to someone in their preferred manner, and accidentally refer to them again against their preferred pronoun.
 - C. However, if the individual feels the staff is intentionally misgendering them, the individual could, and should, submit a Resolution Request to ensure the behavior is looked into and addressed, if determined to be intentional.
 - D. Certain processes have been on-hold pending ongoing work between the DOC and DRW, which includes certain policy revisions and updates.
 - E. Current DOC Policy 400.280 Legal Name Change requires individuals who have received a legal name change to still use their committed name for all written and verbal communication and matters relating to their incarceration (such as their identification cards).
 - F. DOC Policy 400.280 Legal Name Change is currently under review and will include changes to allow those who have legally changed their name to be recognized in all manners by their legal name only, to include being noted as the

only name on their identification cards. Once this policy is finalized, new identification cards will be issued to those who have legally changed their name to reflect this as their identified name for all purposes within the DOC.

10. *Clothing policies and protocols do not fully meet the needs of gender diverse prisoners.*

- A. In 2018, the department gathered feedback and recommendations from the transgender population and enacted comprehensive changes to clothing processes in effort to better meet the needs of the population. The DOC began issuing gender affirming under garments, pajamas and expanded availability of gender affirming hygiene products such as deodorants, soaps, hair care products, razors, and personal property clothing items.
- B. The DOC continues to communicate with the population and enact progressive changes to clothing and property policies. For example, Correctional Industries recently converted its entire shirt production line to change the color of the state issued t-shirt to better accommodate individuals who wear a bra. The previous approved state issued t-shirt was white in color and created a feeling of being “outed” due to the visibility of the bra through the white t-shirt.
- C. On June 14, 2021, written notification was given to all facility Superintendents, Associate Superintendents and Captains that the department was now formally transitioning to gray t-shirts and to exhaust their supply of white t-shirts. Additionally, they were directed to take immediate action to issue gray t-shirts to the transgender population housed in their facilities. Many transgender individuals have already received their gray t-shirts, and some have chosen not to take them until they are available to the entire population.
- D. In addition, the DOC added long sleeved gray t-shirts to the personal property program, allowing incarcerated individuals to purchase and retain personal clothing for the first time in over 15 years.
- E. In April of 2021 the department expanded the state issued clothing policy to provide more flexibility and choice to the transgender population regarding the type of undergarments they choose to wear and increased clothing options.
- F. The department will continue to communicate and listen to the concerns shared by the transgender population regarding state issued clothing and personal property. In addition, conversations continue with DRW to help us better understand specific and individual needs as well as general population, standard issue clothing guidelines.

11. *DOC bathrooms and showers present ongoing concerns and safety risks for transgender individuals.*

- A. DOJ PREA standard 115.15(d) states: “The facility shall implement policies and procedures that enable inmates to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures shall require staff of the opposite gender to announce their presence when entering an inmate housing unit.”

- B. DOJ PREA standard 115.42(f) states: “Transgender and intersex inmates shall be given the opportunity to shower separately from other inmates.” This is also in DOC Policy 490.820 PREA Risk Assessments and Assignments (Section VII.F.), and DOC Policy 490.700 Transgender, Intersex, and/or Gender Non-Conforming Housing and Supervision (Section VII). As such, all facilities have created Operational Memoranda to indicate how they comply with these requirements. For some facilities, this is accomplished via private shower stalls; at other facilities where that is not feasible, transgender and intersex individuals are allowed to shower at alternative times such as during count when others are not in the area. Many choose to continue to shower with the general population as well.
- C. All Washington facilities have consistently been found in compliance with DOJ PREA standards 115.15 and 115.42.
- D. Without more specific information, the department is unable to investigate or examine the safety risks noted.

12. Transgender prisoners report failures in the PREA reporting and investigation process. They feel the PREA system does not adequately protect them and that reporting incidents results in greater danger and harm. They also report that DOC does not offer enough support recovering from a reported PREA incident.

- A. DOJ PREA standards and DOC policy require those conducting sexual abuse investigations be specially trained to do so, and that these investigators shall complete specific tasks, such as gathering and preserving direct and circumstantial evidence, and interviewing known alleged victims, suspected perpetrators, and witnesses. While the OCO report does mention that individuals have reported “It often makes things worse by DOC going directly to their abusers for incident interviews...”, this is a requirement. All known alleged victims, just as all alleged abusers have the right to be interviewed about allegations. Completing an investigation without interviewing all known parties would be inappropriate and irresponsible.
- B. DOJ PREA standards and DOC policy also protect the “right of inmates and employees to be free from retaliation for reporting sexual abuse and sexual harassment.” Each report of retaliation is taken seriously and investigated independent of any associated PREA investigation.
- C. Mental Health providers will continue to respond to individuals’ requests to meet with a mental health provider within 14 days of receiving a DOC 13-509 *PREA Mental Health Notification* form. Treatment plans will be developed to address the needs expressed by the individuals.

13. Transgender, intersex, and gender conforming individuals also have overlapping identities that add to the level of harassment and discrimination they report experiencing.

- A. Many facilities within the DOC have created support groups and peer groups for the LGBTI populations. Unfortunately, as is the case with most programs, the COVID-19 worldwide pandemic has caused the department to suspend the ability for the

majority of these groups to meet. However, the department is hopeful these groups will resume in the near future as opportunities for cohorted programs continue to increase.

The information provided by the OCO was useful to ensure the DOC is doing everything it can to ensure an incarcerated person's time in the agency's custody is fair for all incarcerated individuals. The department also appreciates the OCO's understanding for the unique processes across the correctional system and the addition of policies and procedures being put in place to address them. The department is working toward proactively improving quality assurance processes throughout the department.

Moving forward, the DOC will continue to collaborate with the OCO to strengthen procedures and practices that positively impact individuals' health, safety, and welfare.

Sincerely,



Melena Thompson, Director
Executive Policy Office

MT:kr

c: Cheryl Strange, Secretary
Sean Murphy, Assistant Secretary, Health Services
Patrick Glebe, Assistant Secretary, Prisons
Dr. Sara Kariko, Chief Medical Officer
Dr. Karie Rainer, Director, Mental Health
Charlotte Headley, Chief of Security