

Comments Submitted 12/17/2021

**DIRECTIVE:**

I.A. OCO suggests clarifying what “limited information” may be available to all other employees and where in the electronic file it may be available. Although it appears that DOC intends to limit the availability of STG-related information, the proposed revision opens the door to an unnecessarily wide range of STG-related information being shared with all staff.

II.A.3. OCO suggests adding “upon request, as permitted by RCW 72.09.745.” This language would also mirror the statute, which lists ways that STG-related data may be used including “to assist law enforcement agencies and prosecutors in developing evidence for purposes of criminal prosecution upon request.”

III.A.1. OCO suggests clarifying who (job title) is responsible for conducting assessments at entry or upon transfer.

III.B. OCO suggests incorporating language that explains how and when a person will be notified that DOC has assigned them STG Suspect, Affiliate, or Member status.

III.B.1.a. OCO is concerned that it is possible for a person to be determined to be an “STG Suspect” based on any one criterion from the STG Membership Assessment form. Although it appears that DOC intends it to be the least significant label, the STG Suspect label nonetheless remains assigned indefinitely. In fact, once assessed, the label will appear in numerous locations throughout a person’s electronic file and records, available for viewing by any staff with OMNI access.

IV.A.1. OCO is concerned that the policy’s direction “to determine next steps” is very vague. We suggest amending that language to clarify what must as well as what may happen next.

IV.A.3. OCO is concerned that debriefs are evaluated by only one individual. OCO suggests that DOC require debriefing documentation to be considered by a panel that includes at least one member of a facility or headquarters Equity, Diversity, and Inclusion Council. Having a diverse range of perspectives represented on a panel may help to ensure that the policy is applied equitably.