

Comments Submitted 1/13/2023

DIRECTIVE:

I.B.

The OCO is concerned that the changes proposed in this new subsection will significantly impact programming throughout the DOC. Requiring supervision by custody staff for programs to be held will have a devastating impact on the many volunteer-led and peer-led programs that exist within DOC. Programs like these promote skill development across several domains and enrich participants' social and emotional wellness. At this time in particular, after nearly three years of no or minimal programming due to the pandemic, the OCO urges the DOC to forego the imposition of this requirement.

Additionally, the OCO is concerned that the adverse ripple effects of these proposed changes on related policies are considerable. Many of the policies in the 500-series ("Programs") and the 700-series ("Work Programs") will be impacted. The OCO urges the DOC to postpone changes to this policy until the impact on all related policies can be fully understood and commented on by the public.

Finally, if the DOC decides to move forward with this requirement, the wording of the I.B.2. must be clarified. At present, this subsection suggests that contract staff or volunteer staff can provide supervision. If the DOC intends to limit supervision to only custody staff, the policy should state that clearly.

III.A.1

The OCO receives many complaints from individuals sentenced to life without parole who cannot obtain a job working for Correctional Industries because of the limits outlined in this subsection. Several of these complaints are from individuals housed in long-term minimum custody at Stafford Creek Corrections Center. The OCO suggests that the DOC change this policy to eliminate the limit or, at minimum, increase the designated limit.