

DOC Policy 470.540 Group Violence Reduction Strategy

Comments Submitted 5/21/2021

OCO continues to have serious concerns regarding the use of GVRS within DOC, specifically as it relates to the disparate impact it may have on incarcerated people who are also Black, Indigenous, and/or People of Color.

OCO strongly opposes any changes to the policy that would allow it to be used at additional facilities.

II. B. -- DOC should ensure that facilities include their diversity/equity/inclusion representative[s] as on their local Group Violence Reduction Committees.

IV. B. 2. and IV. B. 3. -- OCO is concerned that the process by which associates and close associates are identified appears vulnerable to misinformation, retaliation, discrimination, and other problems.

IV. B. 4. A. 1) a) – Assistant Secretary approval should be required for imposition of restrictions on more than 4 close associates.

DOC should add to this policy a requirement of an annual analysis of the implementation of GVRS, to include:

- analysis of violence that justifies the use of GVRS
- analysis of racial/ethnic impact of GVRS (analysis of the rate of use of GVRS on individuals who are Black, Indigenous, or People of Color, analysis of the number and types of restrictions applied via GVRS to individuals who are Black, Indigenous, or People of Color, etc.)