

Case Management
Field Components (pgs. 49-79)
Public Comment
COMMENT SHEET

Comment #:	Document:	Page #:	Line #:	Comment:	Response:
<i>Saint Johnsbury P&P</i>					
1	Community Supervision	50	21	13. - this is done on all offenders	This is only needed if making a determination of high-risk. DV/SO cases which are automatically going do not need to do this.
2	Community Supervision	50	29	Some of this does not apply to all transfers in state and transfers out of state	Added language.
3	Community Supervision	50	39	Not required for transfers coming into VT	Added language.
4	Community Supervision	50	33	Add transfer instate, VT conditions	Added language.
5	Community Supervision	51	5	Add procedures for to ICOTS cases accepted by VT.	Unclear with what you are looking to add.
6	Community Supervision	49	General	Have a general intake to start with listing everything that the DOC requires at intake to be signed, pictures, DNA, etc. Rather than listing each supervision status and then listing intake paperwork every time because it appeared that each status had things missing or language was different in each one. Its highly recommended that there be one grand list of DOC intake paperwork procedure, then with subsections or parentheses with what is different for different statuses (example: ICOTS cases that VT accepts from another state we do NOT collect DNA).	This break out is intentional so that staff can search by status in the table of contents.
<i>Ellie Breitmaier</i>					
1	Risk Management Supervision	58	26	can this section be reviewed by Lindy Boudreau DCF Juvenile Justice director and Priscilla White our Child Victim Treatment Director?	This is for adult offenders with juvile sexual offenses.
2	Risk Management Supervision	61	20	is partner contact going to be done by VSS staff or PO? Will there be any kind of MOU with local DV/SV Network program?	This is to be done by a PO and no MOU will be done as part of this. Partner contact is not necessary the victim, it could be, but it could also not be.

3	Risk Management Supervision	66	5	Will DV offenders be referred to DV Accountability programs? If not, what is the alternatives?	This is not addressed in this directive, and involves other policies.
<i>Joel Machado</i>					
1	Community Supervision	49-79	General	The Facility and Field sections should be divided better. Pages 1-50 could be all Facility and 50-100 all Field. Mixing the 2 parts together will only lead to confusion. Case in point, page 32, line 37 to page 38 is entirely Field work but it is in the middle of other Facility work. Page 39, line 10 states Facility CSS and expects the reader to know that this title applies to the next 4 pages. Page 43, line 10 states Field CSS but also expects the reader to remember that this one statement applies to the following 5 pages.	This was written this way so that CSS staff could understand the whole case management process including the other work taking place. This walks someone through intake to discharge.
<i>Cullen Bullard</i>					
1	Risk Management Supervision	56 & 57	5	the discription of furlough should include Medical and compasionate furlough. Compassionate furlough is not used often but medical furlough is occurring more often.	Added language.
<i>Shawn Baraw</i>					
1		63	16	thinking error reference is obsolete and not currently trained.	This is a broad term and is accurate.
<i>Kelly Chamberlain</i>					
1		63	7	One of the major “activities” that should take place during a contact session is the review of long and short term goals with the offender.	Added language.
<i>Cassidy Renfrew</i>					
1	Risk Management Supervision	General		Deferred Sentences: states they may be discharged at midpoint. Would this be the case for any charge except sex offenders which would include DVs? At this time, the directive also indicates that CCO’s would be on teams and part of team staffings etc. Since schedules are always changing, would it be better for that to be at the discretion of the local office?? I believe, in the past, Barre has tried this and found it not as effective as working with the whole FSU team versus an assigned individual. In addition, I REALLY like the electronic monitoring is done by “designated staff”. Would this designation be left up to the local office to decide who this should be ?? This is left a little unclear which I believe would go back to the argument of CCO versus a PO.	1. Yes we could, but it is discretionary. 2. This is a conscious policy decision to ensure that the CCO's are part of the risk management of the offender and not just for risk control purposes. CCOs are change agents. 3. Please refer to the electronic monitoring directive which hyperlinked.
<i>Network Against Domestic and Sexual Violence</i>					

	Risk Management 1 Supervision	General		<ul style="list-style-type: none"> We notice a significant difference in supervision requirements between offenders convicted of sex crimes and those convicted of domestic violence. We would encourage some of the supervision requirements for sex offenders to be adopted for high-risk domestic violence offenders – especially residence and weapons checks. 	Thank you for your feedback. The issues raised outside the scope of this policy.	
<i>Seth Page</i>						
			55	20+23	<p>I believe that Risk Management, and Domestic Violence teams should also be able to override a RMSL after staffing it with their team. There are many time we (RM and DV) are seeing offenders rated at a lower level than what we are seeing them for contact standards. And I understand that we can increase our contacts. But this is shown to be unfair as our cases our divvied amongst our team based on the individuals RMSL. Although someone may have a caseload that is full of RMSL's of 1, they will have to do more work than their teammates, as they still need to meet with their offenders more often because of risk related behavior.</p>	Thank you for your feedback, this is a conscious policy decision.
			61	Contact Requirement	<p>The new directive makes it so that Level 3 offenders do not receive contacts. I am opposed to this. I believe that offenders should be contacted even at the lowest level at least once for every time they have a new residence so that we can verify their living situation.</p>	See page 63 Line 30 for explanation
			61	20	<p>Also victim contacts once a month for field CSS's should be considered to be struck. Field CSS's make contact with victims when necessary, and re-victimizing them monthly is insensitive. Some victim's do not want contact with DOC, and if this contact standard is not struck, there should be language about victim's not wanting to be contacted, should not be contacted more than once. A statement from the victim stating they do not want further updates should be enough for the CSS to stop communication with the victim.</p>	Added clarifying language.
			63	42	<p>It should be noted that we have no training, on how to work with children.</p>	These are collateral contacts and the expectation is your professional judgement.
			68	3-12	<p>This direction requires that Field Probation officers are the only ones that are accountable for any errors in case planning. Facility case workers have no accountability whatsoever. Although 10% of incarcerated cases are audited. If there are issues it falls on to the Probation Officer to make the corrections, and supervise facility case workers to make sure corrections are made. This is unfair to probation officers.</p>	This a requirement that is expected of field offices.

6		69	6-20	The wording in this paragraph makes it sound like Probation Officers are in charge of supervising CCO's.	This is not the intent, the intent is to collaborate and develop strategies with CCO's for supervision.
<i>Breanne MacFarland</i>					
1		49	37+38	What is risk control and risk reduction strategies? It is mentioned many times in the document from here on out, but never defined.	See page 64 & 65.
2		50	19+22+24+27	should be struck. Those responsibilities are of the assigned PO or Admin. Line 25 should say "forward the file to the assigned Field CPS" not "CSS".	These are the requirements that must done, and the Field CSS must ensure that they are done.
3		51	6	A #16 should be added: Travel Permit. Line 19 should be struck – a person on SCS doesn't do furloughs	Changed language.
4	Community Supervision	General		Overall, the Intakes section needs to be more consistent ...each one should be similar and they currently aren't.	Thank you for your feedback.
5		58	33+34	Need to be struck. It is not possible to do VASOR/Static on a juvenile for any reason, so you cannot use the SO Supervision Level Grid.	Not for juvenile offenders, rather for SO offenders who have a sex offense from when they were a juvenile.
6		61		Contact Requirements. The new directive makes it so that Level 3 offenders do not receive contacts. I am opposed to this. I believe at a minimum, all level 3 offenders (Risk, DV, Sex) furlougees should be seen in the field.	Thank you for your feedback, this is a conscious policy decision.
7		61	20	Also victim contacts once a month for field CSS's should be considered to be struck. Field CSS's make contact with victims when necessary, and re-victimizing them monthly is insensitive. Some victim's do not want contact with DOC, and if this contact standard is not struck, there should be language about victim's not wanting to be contacted, should not be contacted more than once. A statement from the victim stating they do not want further updates should be enough for the CSS to stop communication with the victim.	Added clarifying language.
8		62		Graph about offender Directs in the field – Level 4 sex offenders should be seen 2x in the field and 1x in the office.	This change is a conscious policy decision.
9		63	42	It should be noted that we have no training on how to work with children.	These are collateral contacts and the expectation is your professional judgement.

10		63		why are only Field CSS's audited? CCO's and Caseworkers should also be held to the same standard. Especially files at the jail – they need to be kept up and kept intact.	This a requirement that is expected of field offices.
11		64	12	should say "Field CSS or CCO's".	Changed language.
12		65	36-37	What is a Case Planning Guidance Document?	It a preceeding document part of the policy as noted in the table of contents.
13		67		What is a Term Probation Midpoint?	It is described in a separate policy that is hyperlinked and driven by law.
14		69	6-20	The wording in this paragraph makes it sound like Probation Officers are in charge of supervising CCO's.	This is not the intent, the intent is to collaborate and develop strategies with CCO's for supervision.
<i>Jonathan Robinson</i>					
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15		58	13	The requirements for S1 and S2 contact standards are completely the same.	This is ok.
16		58	33	This indicates the Sex Offender Supervision Grid should be used when determining a supervision level for someone under age 18, or 16. This can't work because you cannot score anyone under the age of 18 using the VASOR II, which is how this grid works.	Not for juvenile offenders, rather for SO offenders who have a sex offense from when they were a juvenile.
<i>Ethan Bacon</i>					
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8		62		Graph about offender Directs in the field – Level 4 sex offenders should be seen 2x in the field and 1x in the office.	This change is a conscious policy decision.
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<i>Amy Jacobs</i>					
1		55	20-23	Can Risk Management, and Domestic Violence teams also be able to override a RMSL after staffing it with their team, some need to meet with their offenders more often because of risk related behavior.	No, thank you for your feedback.
2		61		Contact Requirements. The new directive makes it so that Level 3 offenders do not receive contacts – some of my Level 3's appear to need more contact then the 4's or 5's	Please note that this is minimum contacts, see page 63.
3		61	20	Graph from line 20-Also victim contacts once a month for field CSS's should be reviewed again – do we want to re-victimizing them monthly?	Have changed language.
4		65	12	change back to keeping offenders getting out of incarceration on schedule for up to 30 days – some need more supervision when coming out to put on curfew immediately could be a set up for failure.	Thank you for your comment, the policy is based on best practice and evidence.
5		68	3-12	This direction requires that Field Probation officers are the only ones that are accountable for any errors in case planning. Both Field and Facility CSS should be held accountable for their work.	This a requirement that is expected of field offices.
<i>SPPP</i>					
1		50	1	add tattoos and/or major scars to all intakes.	Changed language.
2		50	11	add something that says “even if done before”	Thank you for your feedback.
3		50	12	we often get record checks from court, do we want to put a time frame on this? Such as, if over 6 months, order a new one. Or do you want a new record check period?	Thank you for your feedback, but an updated one is required.
4		53	CVS	we didn't think this was required anymore.	Deleted language.
5		54		Is this referring to both response and risk? It is not clear.	This is for all cases.
6		56		It says risk level as determined by the ORAS. Does it matter which assessment is used? SRT/PIT/CST	The current/valid tool based on timing.
7		57	Footnote 11	need training in utilizing the DVSIR.	This is being implemented.
8		60		It doesn't make sense to us that if they have 9 child porn cases they can't go below a S3, but cases with hands on or with victims can be reduced to S2.	The contact standards are derived from risk assessment and best practice.

9	61		#20 – If you're a level 3 offender, you don't get seen in then the victim gets contacted once per month! Doesn't make sense. What if the victim doesn't want contact? Once per month seems excessive for partner contact (what happened to determining this with the victim?).	Added clarifying language.
10	65	16	doesn't make sense. To assist in the supervision where "not" placing an offender on a schedule would be risk related.	Changed language.
<i>Mary Jane Ainsworth</i>				
1	50-53		Why are all the bullets in these sections drastically different. I know there are some items that only apply to certain areas, however I would suggest taking out any of the areas that pertain to all sections and putting into the Intake Generally section.	Will correct formatting
2	50	2-3	Recommend adding the following after the word procedures, "and import all signed documents into OMS"	Added
3	50	7-8 & 27	All of these list items refer to the same area in OMS. I would recommend combining these and use this verbage, "Complete the Booking Info tab in OMS. While completing this, verify the offender's home and work address."	This is a purposeful decision.
4	51	6-27	I believe supervision fees apply to probation cases. Should there be a bullet indicating that the "Payment Contract/Waiver Application" be filled out in OMS?	Added
5	51	9-22	Recommend adding the bullet of: "Complete the Booking Info tab in OMS. While completing this, verify the offender's home and work address."	This has been taken care of at the top
6	51	12	Change "supervision fee work sheet" to "Payment Contract/Waiver Application"	Changed language.
7	51	25-40	Recommend adding the bullet of: "Complete the Booking Info tab in OMS. While completing this, verify the offender's home and work address."	This has been taken care of at the top
8	51	40	Not sure why this list item is only in this section thus far. The note at the beginning covers this. I would recommend deleting or adding to every section.	Changed language.
9	53	19-20	This is no longer applicable. Staff have not been doing this since OMS went live due to change in functionality with OMS.	Deleted language.
10	58	13	What is the RMSL database? Is it the section in OMS?	Deleted language.
11	63	8	What is revisions referring to? Revisions to the case plan?	Changed language.
12	63	All	Where are contact activities being documented? Contact notes and/or case plan?	Contact Notes
13	64	12-14	Would it be better to have this in a form? This way it can be easily audited to ensure that all are doing the same process.	At a later date this may be a possibility but it is not a priority.

14		65	14	Replace "case" with "contact"	Changed language.
15		68	7	Where is the Risk Management Audit Form going to be kept? Does it need to be in OMS	No
16		69	6	Why is the term "as case manager" added here. I would recommend removing it.	Deleted language.
<i>Jill Anderson</i>					
1		55	20-23	I believe that Risk Management, and Domestic Violence teams should also be able to override a RMSL after staffing it with their team. There are many time we (RM and DV) are seeing offenders rated at a lower level than what we are seeing them for contact standards. And I understand that we can increase our contacts. But this is shown to be unfair as our cases our divvied amongst our team based on the individuals RMSL. Although someone may have a caseload that is full of RMSL's of 1, they will have to do more work than their teammates, as they still need to meet with their offenders more often because of risk related behavior.	Thank you for your feedback, this is a conscious policy decision.
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4		63	42	It should be noted that we have no training, on how to work with children.	These are collateral contacts and the expectation is your professional judgement.
5		68	3-12	This direction requires that Field Probation officers are the only ones that are accountable for any errors in case planning. Facility case workers have no accountability whatsoever. Although 10% of incarcerated cases are audited. If there are issues it falls on to the Probation Officer to make the corrections, and supervise facility case workers to make sure corrections are made. This is unfair to probation officers.	This a requirement that is expected of field offices.

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2		61		Contact Requirements. The new directive makes it so that Level 3 offenders do not receive contacts. I believe RMSL 3 should still be checked on in the field. I don't often work with victims but it is unnecessary to re-victimize them. If they want support they can always reach out, it shouldn't be a mandate for once a month.	Thank you for your feedback, this is a conscious policy decision.
3		63	42	It should be noted that we have no training, on how to work with children.	These are collateral contacts and the expectation is your professional judgement.
4			General	It is unfair that the field gets audited for what the facility does or doesn't do for our center cases we have in common.	This is a requirement that is expected of field offices.
<i>Michelle Pisegna</i>					

1		55	20-23	I believe that Risk Management teams should also be able to override a RMSL after staffing it with their team. There are many times are seeing offenders rated at a lower level than what we are seeing them for contact standards. And I understand that we can increase our contacts. But this is shown to be unfair as our cases our divvied amongst our team based on the individuals RMSL. Although someone may have a caseload that is full of RMSL's of 1, they will have to do more work than their teammates, as they still need to meet with their offenders more often because of risk related behavior. Particularly dealing with the women- I have been finding the women are scoring much lower than they were with the LSI and it is making it difficult to supervise them appropriately with our current RMSL levels. Often they are not getting checked on in the field and I am finding things out way later than I would if they had a higher RMSL.	Thank you for your feedback, this is a conscious policy decision.
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2		58	33	This indicates the Sex Offender Supervision Grid should be used when determining a supervision level for someone under age 18, or 16. This can't work because you cannot score anyone under the age of 18 using the VASOR II, which is how this grid works.	Not for juvenile offenders, rather for SO offenders who have a sex offense from when they were a juvenile.
3					
4		70	29	We have a case plan in OMS for response cases. There is no direction around completing it. Should there be? This is contradicting what was built. Please clarify to ease confusion of staff.	It is not a case plan rather it is a supervision contract.
5		73	14	Why is the term "as case manager" added here. I would recommend removing it.	Deleted
6		75	General	General comment about TRSP, this section talks about Offender link. Are there any requirements to document anything in OMS?	Added Language
7		78	19	Change payment contract to, "Payment Contract/Waiver Application"	Changed
8		76	30	Why are we penalizing TRSP clients for not paying sup fees when other statuses do not?	Because it is a privilege and not a right.

Case Management

Facility Case Management

Public Comment

COMMENT SHEET

Comment #:	Document:	Page #:	Line #:	Comment:	Response:
<i>Sharon Strange</i>					
1	Facility Case Management	General		As part of the intake process, high school diplomas and GED's should be verified. Inmates often lie during self-report. (surprise!)	Thank you for the feedback this would be a CHSVT responsibility but not a CSS responsibility.
<i>Jeffrey Poginy</i>					
1	Facility Case Management	11	3	this needs to be done before shipping an inmate from one facility to another to ensure quality case management.	Add in - when possible the 5 day classification will be done before population movement.
2	Facility Case Management	11	4	if this is for all inmates then we may end up doing multiple record checks for Detained and Sentence detained inmates.	We understand this but it is important to have the most up to date criminal record checks.
3	Facility Case Management	12	5	isn't this a court option determined collaterally between P&P and the court.	No, the DOC still has an ability to make a recommendation consistent with the least restrictive environment of supervision.
4	Facility Case Management	14	box	is the expectation that case plans will be reviewed and WILL be updated or is it that they will be reviewed and updated if needed.	Will change to updated as needed.
<i>Joel Machado</i>					
1	Facility Case Management	11	4	Please add in, "5 day classification must be completed prior to transporting said inmate to subsequent male Facilities.	Add in - when possible the 5 day classification will be done before population movement.
2	Facility Case Management	11	4	"Classification" should be changed to "Custody Level". The whole process of the 5 day classification will be confusing on this point.	We no longer refer to it as a 5 day classification per this specific reason.
3	Facility Case Management	11	4	Please add the list of what is considered a "Legal Holding Document". The DOC cannot hold an inmate WITHOUT THIS! (N.O.S. DOES NOT COUNT!).	Add in definition of Legal Holding Documents - DDR, Bail, Mitt, Affidavit, Warrant, Probation Order, Return on Mitt (check with Cullen)

4	Facility Case Management	11	Supplemental Requirements	This item should state "ADA orientation" (The ADA Program Disability Screening survey is done later, as part of the Programming packet, Notification of Requirement to Register with the SOR, eliminate the SSISA, this should be done later.	Changed to ADA orientation from American with Disabilities Act.
5	Facility Case Management	12		How about adding "Order a record check after 30 days from the date an inmate becomes FULLY SENTENCED. All too often I see record checks ordered days after conviction. VCIC can take up to and over 30 days to update new convictions.	Change to inmates with sentence of less than 30 days will have record check immediately, inmates with sentence of over 30 days will have record check after 30 days. (check with cullen on this section)
6	Facility Case Management	13	3	Delete "or transfer". All too often, newly sentenced inmates are shipped prior to intake being completed. This practice is dangerous and leads to mistakes and delays that are unnecessary.	Delete "or transfer"
7	Facility Case Management	13	5	Add in, explain the consequences for "not being case plan compliant", the effects that DRs will have on release plans and case plans. Let's put some of the responsibility on the inmates at the beginning.	Add in points regarding consequences of DRs/not completing mandated programming
8	Facility Case Management	14	6	"For inmates with release date within 2 years". This is about 75% of the inmates at NSCF. This is not a reduction in work load as discussed with Directors for the paperwork reduction task force. Also, Central Office never seems to be able to understand that projected release date is just a guess in some cases. With the way changes to sentence comps are happening due to Serre and the unknown factors such as RF being unstable and RRP/VTPSA changing release timelines, pinning timelines to "PRD" is a waste of time.	It is a reduction from the previous directive requirements.
9	Facility Case Management	15	5	Every 6 months for contact with OOS inmates. This is a bad idea. How can we expect to get OOS B1's out of jail if you only check in twice a year? How can these inmates stay connected with their case plans and accomplish the items listed in this directive if they do not have meaningful contact with DOC?	Please refer to the new OOS Selection directive for eligibility requirements.
10	General			I can tell that different authors had a hand in writing this directive and that they did not start with a common language. In some Facility areas the term "offender" is used while in other sections "inmate" is used. Inmates are in jail, offenders are in the community.	Will check document for consistency.

11	General			Facility CSS vs. Field CSS. Yes, I understand that we are all of the CSS class. The use of Field CSS is not in line with current communication practice. Probation Officer (PO) is the currently used term, please stick to it. This will help with any confusion on job duties and responsibilities.	These are the classified job titles.
12	General			I believe that a disservice was done to the CSS' and PO's in this regard. By only allowing 12 business days to review and evaluate a 109 page directive, Central office is limiting our ability to supply meaningful feedback. This is the very reason I have taken the effort to give as much feedback as possible.	This is the timeline per the PDU process.
13	General			This Directive should have some language that would attempt to limit or curb the current Core File system. Something as simple as "remove all duplicates" or "If possible, scan into OMS instead of add to the core file".	This is a separate policy.
14	General			In my opinion, Co Case Management is a myth. There is unbalanced power in the 50/50 theory. The PO's hold all the cards. They (along with P&P as a whole) decide when inmates are released. All the facility CSS's can do is forward information to P&P. There is no "give and take". The best direct evidence of this that I can provide is this, the RFPLN survey. The CSS fills out section 1, then P&P can do whatever they want with the rest. The CSS is not allowed to contact Central Office to "make your case", the DM gets this luxury.	The new case management directive does not have co case management but rather identifies specific job duties.
15	General			This Directive is the perfect opportunity to incorporate some of the "Interim procedures and revision memos" into a final directive. I do not see this happening. http://doc.vermont.gov/about/policies/rpd/interim-and-memo/interim-procedures-and-revision-memos/	This was done, and if the were not incorporated it because they are going elsewhere.
16	General			1. The change to contact standards is a step in the right direction. An instate inmate with a minimum release date of 2055 does not need to be seen every 14 days.	You are correct.
17	General			2. 5 day classification. This directive takes another step in the right direction with the initial classification and orientation. The tasks preformed at this time are vital to effective case work. Front loading as much as possible will also lead to less changes in case plans. Fewer changes means less work time wasted.	You are correct.
18	General			3. OMS. Adding directions on how to enter data into OMS is a big move forward. This will make staff be more consistent and will lead to fewer communication breakdowns. More could be done in this area, good start. Some language in this directive would be helpful if "all sites would scan and upload Mitts, Affidavits and such, into OMS".	Further direction will be provided as future policies are created.

19	General			4. SMART. Never heard of this. Sounds interesting, however due to the constraints placed on inmates, this is not going to happen. Goals are great, when appropriate. In jail, security trumps almost everything that is “outside the box”.	Larry to draft response.
20	General			5. Who needs a case plan? Short term inmates, less than 6 months, should not need a long case plan. Good change.	This wasn't a change rather short-term inmates have never needed a case plan.
21	General			6. PMD and MPL. Some discussion occurred with Director Touchette about this. It is good to see that this area is identified as having VAST room for improvement.	You are correct.
22	General			7. Mental Health. It is good to see that Central Office is concerned about this area however, CSS staff are not qualified mental health workers. If you want to send me to college to get my Masters, feel free.	We are unsure what you are referencing specifically.
23	General			8. Helping inmate re-enter the community is important. How about adding the RE-ENTRY COORDINATORS to this directive? Give them some official job duties.	Specific job duties are not defined in directive, however the roles of reentry coordinators are being reassessed.
24	General			9. Identify if an inmate owes money in the community. Awesome idea. Making contacts beyond the Restitution unit would be nice. We used to call this “repaying the debt to society” and “returning value to the community”.	Thank you for your comment.
25	General			10. Residence check no less than 30 days prior to release. Good idea. I would also like to see “an approved residence is good for 90 days”. The more time we have prior to release to find out if a primary residence is approvable give the inmate and CSS more time to find backups if the primary is denied.	Dale
26	General			11. ORAS. Adding in some direction on this risk assessment is much better than what we have had to work with i.e.; emails, word of mouth and memos.	Thank you for your comment.
27	General			12. RRP. Adding in language to give the CSS some guidance on RRP is also better than what we have been working with.	Thank you for your comment.
28	General			13. Staffing for Transitional Housing ONLY. This is a good idea. DOC should not allow P&P to dictate housing if approvable residence is available without this staffing. This is in line with DOC policy to use private residences first, to keep the burden off public housing and sober houses.	Thank you for your comment.
<i>Christina Granger</i>					

1	General			This feedback was originally submitted earlier (Joel Machado)- I concur with just about everything written below. Writing big long summaries for a case plan in the facility is unrealistic. I concur that the field should be doing most if not all of the re-entry case plan. I am not aware of all the requirements and or resources in their specific areas and the field would have a better knowledge of this. This directive needs A LOT of work to match practice and give clear direction to define roles and designation of tasks. We just had a meeting to reduce paperwork however this directive doesn't cut much and allow for true casework.	This directive identifies the standard for case management throughout the state. It identifies what practice needs to become in order to meet policy requirements.
<i>Stephen Russell</i>					
1	Facility Case Management	11	3	Is there any way we are able to access this info. In OMS in such a way that we can pull up the scanned document rather than wasting time seeking out different possible locations?	Currently there is not although we hope in the future something can be developed.
2	Facility Case Management	15		In regards to collateral consequences notice...it is not practical to wait until the day the offender maxes out. There may be mitigating factors that does not allow the facility CSS to do this. Therefore the recommendation would be that we review this with them on the last contact. Also, is this in statute that DOC will do this as it is our understanding that it is done by the court as well.	This is a statutory requirement which we are unable to alter.
<i>Shawn Baraw</i>					
1	Facility Case Management	12	12	redundant wording about the facility CSS reviewing the case with the field CSS.	Changed language.
2	Facility Case Management	12	paragraph 1	Projected release date – where is this recorded in OMS? There is a place in facility case management for a projected movement code and date, however there is no section I've found specifically for PRD.	This is being built in as part of the directive process - it will be located where PMD is now in case management tab.
3	Facility Case Management	14		how shall case plan reviews and updates be documented? Is a contact note adequate or does a new facility case plan form need to be completed which will be a lot of work for CSSes as the form does not autopopulate with the existing case plan requiring the entire plan be re-entered, or can changes be made to the existing case plan and a note be entered documenting the change in contact notes, as the created date cannot be changed and there is no way to created a last updated date.	Need to adjust language to add in that the date must be changed at reviews.
<i>Mary Jane Ainsworth</i>					
1	Facility Case Management	11	4	In Row 2 Column 2 of the table. Bullet 1 should read, "Update the Projected Release Code as needed; ensuring the date matches the Projected Release Code." This will conform to the new language in replacing PMD	Changed.

2	Facility Case Management	12		Column 2 Bullet 1: Should it read, "Determine/update the Projected Release Code & Date"? This only advises staff to update the date and not the code.	Changed
3	Facility Case Management	12		Column 2 Bullet 4: Replace "the database" with "OMS"	Changed
4	Facility Case Management	12		Column 2 Bullet 6 & 9: Suggest combining the two bullets into one reading: "Identify the inmate's candidacy for Out of State (OOS) Placement to include completion of the Out of State Prioritization and Out of State Eligibility Points Based Classifications and prepare OOS packet as required"	Delete 9 and relocate to separate section.
5	Facility Case Management	13	4	Replace "the database" with "OMS"	Changed
6	Facility Case Management	14	2	Column 2 of the table: Last bullets should be updated with: Administrative Code & Date; Projected Release Code and Date	Changed
7	Facility Case Management	15	1	Row 1 Column 2 1st Bullet: Add word "to" between arrival and the; Add word "facility" after state.	Changed
8	Facility Case Management	15	1	Row 1 Column 2 2nd Bullet: Suggest replacing "interactive television" with "video conference". The term video conference has been used in other places. Doing this replacement will keep the consistency	Changed to teleconferencing
9	Facility Case Management	15	4	What is the Collateral Consequences Notice that is referenced in this table? Is it something that needs to go into OMS?	Will link into the notice - but it does not need to go in OMS.
<i>Amber Gibbs</i>					
1	Facility Case Management	11	4(R Column #1)	Update the terminology "Projected Movement Date(PMD) to "Administrative Codes"/"Projected Release Code"	Changed
2	Facility Case Management	12	Column #1	Match Terminology from PMD to Admin. Codes/Projected Release Code	Changed
3	Facility Case Management	13	18-20	I would suggest that instead of a face to face within 2weeks, that we keep it as is; and that a letter is sent, which also includes the PREA information; and we could make the standard that on the next trip to the facility the CSS will meet face to face w/ the inmate	This is a conscious change in policy.
4	Facility Case Management	13	25-27	The OOS Facility caseworkers do their own facility orientation; and provide the inmate population with their handbooks.	No this is done by GEO and the policy reflects this.
5	Facility Case Management	13	30-32	OOSU CSS's do not readily have a list of offered Education/Vocational offerings. (there needs to be a process put in place regarding communication of what is offered, and who is attending and a participation update)	The OOSU should have this list.
6	Facility Case Management	14	2	Table #2; Third Bullet point (Terminology needs to be updated to Admin. Code or Projected Release date/code	Changed

7	Facility Case Management	15	1	Table contents: eliminate the 2 week phone call/video conference. Replace with the welcome letter; and the OOSU CSS will meet with the new arrivals face to face at their next rotation in Travel to the Facility.	No, this was a change in policy.
8	Facility Case Management	15	4	Tables first columns; "will max out of a correctional facility" and "will max out from Prison" clarify if these are the same or different; give and example of the differing in terms if they are different.	Will change to a correctional facility.

(Feel free to use additional space as needed)

Case Management

Risk Assessment (pgs. 84-93)

Public Comment

COMMENT SHEET

Comment #:	Document:	Page #:	Line #:	Comment:	Response:
<i>Sharon Strange</i>					
1	Risk Assessment	General		There is an extensive list of assessments, but not clear guidelines of who gets which ones. Personally, I feel that there should be reading and writing assessments done prior to any groups to find out if an inmate is capable of doing groups on their own or may need some help (rather than wait for them to ask since most are embarrassed if this is the case and may not say anything).	Thank you for your feedback, we will be looking at this further as policy develops in the risk and needs reducing services arena.
<i>Joel Machado</i>					
1	Risk Assessment	84	14	If evaluations are going to be conducted by “trained evaluators” outside of DOC, then remove these assessments from our directive. A statement such as “The highest level of Risk will be used no matter the survey...” . If this is true then the opposite must also be true..	Thank you for your feedback, we disagree as the assessments impact case management. The expectation is the CSS understands them broadly.
2	Risk Assessment	84	19	This shows that DVSIR and Sex offender assessments will supersede other risk assessments.	Yes, they will, and this is the intention.
3	Risk Assessment	84	34	A “cohort”? Override the initial risk assessment. Please add in language that would allow the “cohort” to uphold the initial assessment as valid.	Changed language.
4	Risk Assessment	85	16 box 3+4	I do not believe that these items, Furlough Revocations and a yearly PIT review/update are in accordance with our training from the University of Cinn.	These were developed in consult with the University of Cinn.
5	Risk Assessment	87	step 3	Complete an audio tape? Never heard of this requirement.	There is a memo that was previously released.
6	Risk Assessment	90	9-18	VRAG Remove this, we cannot administer this assessment.	This information purposes to assist in case management.
7	Risk Assessment	91	24	Again, not administered, used or needed by CSS’. Useless. Also include SIM, Woodcock, JSAI, BESI, CDM, WFRA and Portfolio assessment. Not used, not needed, and also, useless to CSS’s.	This information purposes to assist in case management.
<i>Cullen Bullard</i>					
1	Risk Assessment	88	7 to 12	CVS is not used for determining future services, it is used for placement within a facility.	Changed language.

2	Risk Assessment	90	9 to 16	VRAG is an instrument not conducted by DOC staff, it should be noted in here.	See Line 18.
<i>Stephen Russell</i>					
1	Risk Assessment	84		Haven't seen where the ORAS breaks down risks into percentages, only low/moderate/high.	Please refer to the ORAS manual.
2	Risk Assessment	86		Do we not do an ORAS who was sentenced to less than one year? And does the amount of time served account for Workcamp Goodtime?	The DOC does not do the Prison Intake Tool on inmate's sentenced less than a year; you will conduct an ORAS reentry tool when they come into their reentry window. Work camp eligibility/day for day is not considered when determining whether or not to do a Prison Intake Tool, the determination is on the sentence.
3	Risk Assessment	88		This would be a good spot for specific guidance in regards to scoring of the CVS.	The intention is to hyperlink as further policy is developed.
<i>Shawn Baraw</i>					
1	Risk Assessment	84	12	replace is with are.	Changed language.
2	Risk Assessment	84	13-14	consider rewording.	Changed language.
3	Risk Assessment	84	17	replace assessed with determined.	These words have two different meanings.
4	Risk Assessment	84	18	reword to "offense specific"	Changed language.
5	Risk Assessment	84	23	remove word "subset"	Changed language.
6	Risk Assessment	84	29	definition of level B offender pertains to those who score at or above the mean score in the moderate risk band of a risk assessment tool. Recommend review with Director Bushey for proper wording.	This will be further flushed out in future policy.
7	Risk Assessment	84	31	remove word "violent"	Removed violence
8	Risk Assessment	85	6	suggest wording "services to address areas of risk... when the inmate is released..."	Changed language.
9	Risk Assessment	85	10	remove word "or" at end of line	Changed language.
10	Risk Assessment	85	11	recommend "The tool(s) selected will depend on the specifics of the offender's circumstances" have situation and circumstances is redundant.	These are different one denotes situational timeline, the other is specific case characteristics.

11	Risk Assessment	85		ORAS table: specify in PIT, RT, and SRT sections that the tool is to be administered by an ORAS certified CSS.	Will do.
12	Risk Assessment	85		PIT – how is sentenced to 1 year defined? Are we considering total sentence, sentence structure, or real time to serve after credit? For example do we do a PIT for a 6 m to 3 year sentence as the total sentence is greater than one year? Or for a 18 m to 5 year sentence with 12 months of credit so real time is only 6 months but the minimum sentence was over a year?	The DOC does not do the Prison Intake Tool on inmate's sentenced less than a year; you will conduct an ORAS reentry tool when they come into their reentry window. Work camp eligibility/day for day is not considered when determining whether or not to do a Prison Intake Tool, the determination is on the sentence.
13	Risk Assessment	89	DVSIR	what about facility CSS staff?	Changed language.
<i>SPPP</i>					
1	Risk Assessment	84	23+24	Line 23/24 – we do not know what the subset correctional program means.	Changed language.
<i>Mary Jane Ainsworth</i>					
1	Risk Assessment	84	4 & 8	In both lines Screening & Assessments is written two different ways. Should they be written the same way?	Will change to screenings and assessments throughout.
2	Risk Assessment	84	9	What is the definition of status in this case? I ask because most of the time staff think of legal status when they see the word status.	Please refer to the example that follows.
3	Risk Assessment	85	6	Add "is" after inmate	Changed language.
4	Risk Assessment	85	10-11	What does "various cohorts of offenders or at various times" mean?	Changed language.
5	Risk Assessment	85		Column 2 Row 1 Replace "probation officer" with CSS. I believe the rest of the document has been using CSS.	Changed language.
6	Risk Assessment	87	2	Move to line 3 on page 86. Seems like this should come before the chart.	Leaving so staff recognize the importance of the table.
7	Risk Assessment	88	7-9	I thought this tool was used to determine an offender's security classification within a facility. This does not state that.	Changed language.
8	Risk Assessment	89	36	Replace probation officer with CSS	Changed language.
9	Risk Assessment	90	5	Replace probation officer with CSS	Changed language.
10	Risk Assessment	91	24-25	This line should be bolded as this is a title of an assessment.	No this is formatted.
11	Risk Assessment	92	1	This line should be bolded as this is a title of an assessment.	No this is formatted.
12	Risk Assessment	92	13-14	This line should be bolded as this is a title of an assessment.	No this is formatted.
13	Risk Assessment	92	26	This line should be bolded as this is a title of an assessment.	No this is formatted.
14	Risk Assessment	92	29	This line should be bolded as this is a title of an assessment.	No this is formatted.
15	Risk Assessment	93	1	This line should be bolded as this is a title of an assessment.	No this is formatted.

16	Risk Assessment	93	5	This line should be bolded as this is a title of an assessment.	No this is formatted.
17	Risk Assessment	93	16	This line should be bolded as this is a title of an assessment.	No this is formatted.
18	Risk Assessment	93	22	This line should be bolded as this is a title of an assessment.	No this is formatted.
<i>Jeanne Smith</i>					
1	Risk Assessment	General		<p>1) Has it been considered to access special education backgrounds? CHSVT does this when necessary, but I am wondering if it was considered to be done earlier in the process and listed in the directive?</p> <p>2) Was it discussed to use the CASAS and SIMS assessments for all individuals, those with and without diplomas? We often see students who have diplomas, but have with substandard skills. Taking these tests is already a part of the workforce readiness program, but in general there are very likely more individuals remain at risk due to poor skills. Perhaps we could offer the tests sooner to see if they would be interested in classes to help improve their chances of employment.</p> <p>3)After line 27/28 re JSAI, BESI, CDM on page 92 add: Interpretation of results is explained for each test.</p>	1+2) This will be considered in the risk and needs reducing services policy. 3) Changed language.
<i>Network Against Domestic and Sexual Violence</i>					
1	Risk Assessment	General		<ul style="list-style-type: none"> We recommend that the DVSIR is the risk assessment tool used to evaluate risk of domestic violence offenders. Our understanding is that the DVSIR has been adopted but is not being used by the DOC currently. We encourage the DOC to norm the tool and begin using the DVSIR for all domestic violence cases as soon as possible. The DVSIR (as opposed to the ORAS) will provide the most accurate information on the risk to domestic violence victims. 	The tool is being used and the DOC is preparing to resume training and direction.

Case Management
Case Planning (pgs. 16-38)
Public Comment
COMMENT SHEET

Comment #:	Document:	Page #:	Line #:	Comment:	Response:
<i>Saint Johnsbury P&P</i>					
1	Case Planning	33	23	Missing Probation and ICOTS	Changed
<i>Sharon Strange</i>					
1	Case Planning	General		The timing of the case plan and how it is created is a bit confusing. In one spot, it says that within 5 days the case worker begins writing the case plan, but in another spot it says they meet with the inmate within 5 days and review the case plan with them. How can you review a case plan before it is completed? It also says that the inmate is involved (along with others who are part of a case management team) in creating the case plan, which is great, but I can't imagine that the case plan can actually be put together and finished within 5 days of the inmates incarceration. I don't see anything anywhere else that says how soon after beginning the case plan process a meeting needs to be scheduled to develop it with the team or when it needs to be actually completed by.	Within 5 days they should begin writing the case plan and then once completed review with the inmate.
2	Case Planning	General		Also, it states that a program referrals should be made based on assessments, but prior to the case plan. My understanding is that the case plan is actually supposed to dictate the program referrals. For instance, assessments may say they need multiple things, but realistically they can't all be addressed at once. How can referrals be put in before this is determined by the case plan?	Referrals should be made based on the assessments. Remove program referrals.
3	Case Planning	General		I don't see anything about whether the inmate would be kept from transports once they are participating in RRP (including education), but I would assume that will be part of it. Currently, they don't ship them anywhere while they are participating in groups, but they do ship them when they are in education, which can make it extremely difficult to complete anything.	This is a separate policy issue.
4	Case Planning	General		I don't see guidelines for caseplanning regarding how to balance multiple needs. If they need group, but they also need education and/or work, there should be something about this in the directive.	This is based off of responsivity, but there are guidelines regarding the big 4.
5	Case Planning	General		I don't see anything about when an inmate would begin RRP (including education). Currently if they are referred for group they don't participate until near the end of their incarceration. If they need education, it should begin to be addressed immediately. They typically can't improve their skills or get a diploma in only a few months' time.	This is a separate policy issue.

6	Case Planning	General		Is there somewhere in OMS that documents who was part of the case management team that created the case plan? I didn't see a reference to that.	The guidance specifies that the CSS and the offender create the case plan. This does not limit the CSS obligation to reach out as needed other parties.
<i>Jeffrey Poginy</i>					
1	Case Planning		16	this page is completely worthless. Case planning in jail is never able to reach these "pie in the sky" goals. Facility case plans are as simple as this. Criminal History-Stop getting DR's, Education, Employment and Financial, Go to CHSVT if you do not have a diploma, Apply for work, and save your money for release. Family and Social, use mail, phone, visiting and Jpay in a pro-social manner with your family and support system. Substance Abuse and Mental Health, Remain substance free, engage with MH as needed. Criminal Attitude and Behavior, Remain DR free, stop breaking the law. Everything that has to do with an inmate's ability to get out of jail is considered a "time line". Serve to PE date, Complete programming, Get out. Keep it simple. Focus on what an inmate needs to do to get out of jail. None of page 16 is useful. Think I am wrong, come to NSCF.	Thank you for your feedback, DOC CSS will be required to engage the offender and meet these expectations.
2	Case Planning		17	OOS Criteria "OOS Criteria". Whoever wrote this has no idea how OOS selection works. Neither do I. It seems like Central Office makes up a list out of thin air, sends the CSS's this list to review, then picks completely different inmates to send and demands OOS packets ASAP. Central Office never sends the inmates that we want to go OOS. VAST DISCONNECT HERE.	Please review the new OOS Selection directive which clearly outlines how OOS Selection is made.
3	Case Planning		18	Holds CSS staff do not track holds. This is done at a much higher level. I do not even know who on my case load has a hold.	Please review the new OOS Selection directive which clearly outlines how OOS Selection is made.
4	Case Planning		18	packet completed would never complete a full OOS packet on an inmate that I refer for OOS. I would never waste my time, we wait until Central Office puts out a list. Then a packet is completed. 14. Page 18, Med Clears. Whoever wrote this has no clue about the process for obtaining a med clear for OOS or the Work camps. I send the name to my LUS, He sends the name to Sean O'Connell, S.O. then sends the name to someone else who then sends the name to the Medical Company, who then sends the name through their channels to the local medical department. When the med clear is complete the notification follows the same route back but, it never makes it all the way to me. Most of the time the inmate will disappear on a transport before I ever know he was cleared.	Please review the new OOS Selection directive which clearly outlines how OOS Selection is made.

5	Case Planning	18	med clears	Whoever wrote this has no clue about the process for obtaining a med clear for OOS or the Work camps. I send the name to my LUS, He sends the name to Sean O'Connell, S.O. then sends the name to someone else who then sends the name to the Medical Company, who then sends the name through their channels to the local medical department. When the med clear is complete the notification follows the same route back but, it never makes it all the way to me. Most of the time the inmate will disappear on a transport before I ever know he was cleared.	Please review the new OOS Selection directive which clearly outlines how OOS Selection is made.
6	Case Planning	18	28	We have even stopped worrying about the U23 population and truancy.	The U23 expectation defined in statute that must adhered to.
7	Case Planning	17-19		Do you really need to give an example of what a date looks like? Really?	This is necessary for consistency
8	Case Planning	19-30		This entire grid detailing MPL/PMD codes is more appropriate for a supporting document. 12 pages of code descriptions is not efficient.	The entire case planning section is a supporting document for the directive.
9	Case Planning	31	7	Insert a summary of the inmate's criminal history. This is not useful. This information is in OMS under the Arrest Charges tab, in his record check and on the Sentence comp.	The OMS Arrest charges tab is limited to information relevant to the current sentence and pending charges and may not include all criminal history information. If a CSS has knowledge (from record check) it should be entered here.
10	Case Planning	31-32		Typing in long summaries about the risk areas is not a good use of my time. How about this idea, we make the inmates do the work, like we did with the old ORP? Then we could just scan their work into OMS. Make the inmate put in the effort.	Thank you for your feedback, DOC CSS will be required to engage the offender and meet these expectations.
<i>Cullen Bullard</i>					
1	Case Planning	19	6	when the administrative Code and Administrative Date are "none" it should be "NA" or Not Applicable.	Will change.
<i>Stephen Russell</i>					
1	Case Planning	17	14	Does an inmate serving a sentence of 6 months or more mean 6 months incarcerated time or 6 months maximum. Example; is a caseplan required on a zero min. and 6 month maximum?	Changed
2	Case Planning	18	13	will LUS be working directly with medical dept. or will they still be required to go through Central Office, Sean Oconnell?	Still through Central Office.
3	Case Planning	19		does not match OMS applications. We are only aware of PMD Code and the Projected release date. We do not have option to enter administrative code, administrative date, etc. Will OMS be change to reflect this?	Yes OMS will be adjusted.
4	Case Planning	21		of there are PMD codes that are no longer relevant to the direction in OMS then we should remove those codes as options to avoid confusion. The chart itself is confusing and can be simplified.	Yes OMS will be adjusted.
5	Case Planning	28		specify credit for time served counts towards RF calculations	Changed

				understand that caseplans need to include specific ways to address criminogenic need they also needs to be in simple, objective terms so the offender understands. These appear to be case summaries instead of a case plan. The concern with the example is that it sounds like a professional summary provided by a qualified health care professional versus a CSS with no clinical experience or degree. Also, the example sound more like a conversation in 3rd party versus conversation with the offender.	
6	Case Planning	31-32			These will be rewritten
<i>Shawn Baraw</i>					
1	Case Planning	16		refers to addressing an offenders top 4 to 6 criminogenic needs, what about offenders with fewer needs or whose sentence structure is such that they will not have a risk assessment completed prior to a re-entry assessment resulting in not being able to identify their criminogenic needs. For example: offender is convicted of Domestic Assault and sentenced to 11 months to 3 years. A PIT is only completed on offenders sentenced to a year or more in prison, as he is eligible for release in as little as 11 months the person will not be assessed until 6 – 8 weeks prior to re-entry. As there are more than 6 months to serve the inmate is required to have a case plan but no risk assessment has been completed to inform of the criminogenic need areas. How does a SMART plan get completed in an informed manner?	This will be addressed as part of implementation.
2	Case Planning	17	4	refers to “triggers” – what are triggers? This is not common terminology.	This is referring to activating event.
3	Case Planning	17	11	refers to the case management team – who makes up this team?	Change to Facility CSS
4	Case Planning	18	13	does not accurately reflect current practice. The CSS forwards the name of the potential work camp eligible inmate to the CLUS who reviews eligibility and submits the name, if eligible to Sean O’Connell, who then submits the name to medical for clearance. Medical then informs O’Connell of the clearance decision who then informs the facility.	Check with Cullen
5	Case Planning	19-31		contain Administrative codes/dates and Projected release codes/dates with an explanation. Where is this recorded in OMS? I have not observed an place for administrative code and date entry or projected release code and date entry. All there is that I’ve found is a place for “projected movement” codes and dates. If we only use PMDs the guidance documents should reflect the practice. This whole section serves to confuse current practice, especially when referring to partnering the various codes. Will there be changes to OMS to allow for administrative codes and projected release codes/dates instead of the current PMD codes used by the system?	This will be added to OMS.
<i>Kelly Chamberlain</i>					

1	Case Planning	31	4-5	Since the ORAS does not specify individual criminogenic needs in the results; we should change the verbiage to match that of the ORAS. Such as “These sections shall identify a plan/response to the inmate’s moderate and high risk areas as identified by the ORAS –Prisoner Intake Tool.” I think it is unfair to specify top 4-6 criminogenic needs when that is not how the information will be presented.	Thank you for your feedback, the evidence is very clear that we should address the top 4 needs which may differ based on multiple assessment tools.
2	Case Planning	31	4	It needs to be specified which ORAS tool used to inform which plan. Just as here we would specify the PIT – page 36 line 35 should indicate that the community case plan is informed by the Community Supervision ORAS Tool. If we follow this pattern, then page 44; line 8 should indicate the use of the Re-Entry tool here. We may also need further clarification on when to use the Re-Entry Supplemental tool to inform a case plan.	Thank you for your feedback, the evidence is very clear that we should address the top 4 needs which may differ based on multiple assessment tools.
3	Case Planning	31	9	It needs to be specified which ORAS tool used to inform which plan. Just as here we would specify the PIT – page 36 line 35 should indicate that the community case plan is informed by the Community Supervision ORAS Tool. If we follow this pattern, then page 44; line 8 should indicate the use of the Re-Entry tool here. We may also need further clarification on when to use the Re-Entry Supplemental tool to inform a case plan.	Thank you for your feedback, the evidence is very clear that we should address the top 4 needs which may differ based on multiple assessment tools.
4	Case Planning	32	37	Is there a “due date” for the Community Case Plan? Or a time when it needs to be started by? I realize this is a living document, but should there be some date in which the initial plan should be complete? When do some initial SMART Goals need to be set by?	Added language.
<i>Seth Page</i>					
1	Case Planning	34		Only Sex offender cases can be overridden with a Supervisors approval. Risk Management and Domestic Violence should have that option as well.	This was a conscious policy decision based on best practice and evidence based research.
2	Case Planning	35	1-8	This needs to be a check off not a drop down menu in OMS.	This will be discussed as part of OMS request.
3	Case Planning	35	17-25	The current format on OMS does not allow to place multiple restrictions. This needs to change to a format that we can give someone Travel restrictions, and contact restrictions.	This will be discussed as part of OMS request.
<i>Breanne MacFarland</i>					
1	Case Planning	16	7-13	How are we to handle when our goals differ? As the PO, I want someone to be sober, but as the offender, they often want to (for example) quit using heroin, but want to still use BUP off the street and marijuana.	The goals on the case plan need to be consistent with the risk level and the identified risk/need areas.
2	Case Planning	19		I do not see where in the directive it says that the Facility case worker is responsible for the facility case plan	Will spell it out.
3	Case Planning	35	1-8	This needs to be a check off not a drop down menu in OMS. Sometimes all of these are options, sometimes 2 or 3. Typically more than one and less than all.	This will be discussed as part of OMS request.

4	Case Planning	35	17-25	The current format on OMS does not allow to place multiple restrictions. This needs to change to a format that we can give someone Travel restrictions, and contact restrictions, for example.	This will be discussed as part of OMS request.
<i>Jonathan Robinson</i>					
1	Case Planning	16	7-13	How are we to handle when our goals differ? As the PO, I want someone to be sober, but as the offender, they often want to (for example) quit using heroin, but want to still use BUP off the street and marijuana.	The goals on the case plan need to be consistent with the risk level and the identified risk/need areas.
2	Case Planning	19		I do not see where in the directive it says that the Facility case worker is responsible for the facility case plan	Will spell it out.
3	Case Planning	35	1-8	This needs to be a check off not a drop down menu in OMS. Sometimes all of these are options, sometimes 2 or 3. Typically more than one and less than all.	This will be discussed as part of OMS request.
4	Case Planning	35	17-25	The current format on OMS does not allow to place multiple restrictions. This needs to change to a format that we can give someone Travel restrictions, and contact restrictions, for example.	This will be discussed as part of OMS request.
<i>Ethan Bacon</i>					
1	Case Planning	16	7-13	How are we to handle when our goals differ? As the PO, I want someone to be sober, but as the offender, they often want to (for example) quit using heroin, but want to still use BUP off the street and marijuana.	The goals on the case plan need to be consistent with the risk level and the identified risk/need areas.
2	Case Planning	19		I do not see where in the directive it says that the Facility case worker is responsible for the facility case plan	Will spell it out.
3	Case Planning	35	1-8	This needs to be a check off not a drop down menu in OMS. Sometimes all of these are options, sometimes 2 or 3. Typically more than one and less than all.	This will be discussed as part of OMS request.
4	Case Planning	35	17-25	The current format on OMS does not allow to place multiple restrictions. This needs to change to a format that we can give someone Travel restrictions, and contact restrictions, for example.	This will be discussed as part of OMS request.
<i>Amy Jacobs</i>					
1	Case Planning	34		Only Sex offender cases can be overridden with a Supervisors approval. Risk Management and Domestic Violence should have that option as well.	This was a conscious policy decision based on best practice and evidence based research.
2	Case Planning	35	17-25	OMS does not allow to place multiple restrictions	This will be discussed as part of OMS request.
3	Case Planning	36+37	32-36; 1-42	are we only concerned with addressing Moderate/high needs area's from the ORAS in the case plan?	No - We are considering with addressing the moderate/high need areas to all their assessment tools aswell as responsivity factors that prevent barriers to addressing the moderate/high need area targets.
<i>SPPP</i>					
1	Case Planning	33		Why do we need this "investigation" tab on the case plan form as we don't do case plan when clients are pending investigation?	This is where it is located in OMS.

				<p>We feel there should be discretion for overrides for cases other than SO offenders as we often have difficult cases that require more supervision. This would be with supervisor's approval.</p> <p>Is there any way to show the history of RSML levels?</p> <p>Would also like to see a comment section where the PPO could describe the reasoning behind the change.</p>	This is a conscious policy decision. Talk to MJ
2	Case Planning	34			
3	Case Planning	35		<p>1d. – we were of the understanding that risk reduction was not treatment.</p>	This encompasses more than RRP
4	Case Planning	36		<p>Admin Type</p> <p>d. – What is Unsup-unsupervised</p> <p>36 Admin – refers to offender</p> <p>Programming 1 – refers to inmate</p> <p>36 Programming 2 line 26/2</p> <p>You ask that notes be in full sentences but then you use acronyms in your example. Is this contradictory?</p> <p>37 Programming 9 line 4/5</p> <p>The expectation is that Mr. Doe remain in RRP until he maxes out his probation term (not a good example because we would request an extension or file a VOP).</p>	Changes made
5	Case Planning	37		Examples provided are not SMART objectives.	Will be rewritten
<i>Mary Jane Ainsworth</i>					
1	Case Planning	17	28-29	<p>We had some changes to the OOS holds the parentheses should read, "(i.e., Court; Facility Worker Hold; Hold Expired; Hold Removed; Medical/Mental Health; VCI Hold)"</p>	Changed
2	Case Planning	33	14-23	Missing type of Probation	Changed
3	Case Planning	32-38	Community Case Plan	<p>This section does not reference the Response Supervision case plan that is in OMS. Will this be referenced in the Response Supervision directive?</p> <p>This case plan was built at the directive of field services and there is no guidance on its use anywhere.</p>	Yes it is.
<i>Jill Anderson</i>					
1	Case Planning	34		<p>1. Only Sex offender cases can be overridden with a Supervisors approval. Risk Management and Domestic Violence should have that option as well.</p>	This was a conscious policy decision based on best practice and evidence based research.
2	Case Planning	35	1-8	This needs to be a check off not a drop down menu in OMS.	This will be discussed as part of OMS request.
3	Case Planning	35	17-25	<p>The current format on OMS does not allow to place multiple restrictions. This needs to change to a format that we can give someone Travel restrictions, and contact restrictions.</p>	This will be discussed as part of OMS request.
<i>Amber Charbonneau</i>					
1	Case Planning	General		All cases should have the option to override.	This was a conscious policy decision based on best practice and evidence based research.

				The current format on OMS does not allow to place multiple restrictions. This needs to change to a format that we can give someone Travel restrictions, and contact restrictions.	This will be discussed as part of OMS request.
2	Case Planning	35	17-25		
3	Case Planning	General		Facility case worker should be responsible for the facility case plan. There is a lot of confusion over this currently. Most of the time it does not get done regardless, yet when the field is being audited, it is an expectation that it is done. On Page 43 and 44. The responsibilities of the field CSS in the Reentry Case Plan. Many of the things that is required of the Field CSS are beyond our scope. Such as finding out if the offender owes child support, and other debt. In the third row it states "Consulting with the CSS on the Developmental Services survey with the offender." I am unsure as to what this survey is. In row four it says "Identifying the offender's transportation options when supervised in the community." I feel that this takes away accountability for the offender. It should be noted Probation officer do not have access to child support issues. This is also mentioned on Page 45 Line 20. Row 5 states that Residence approval shall be done "No less than 30 days prior to release." How is this possible when the residence investigation is required to be done within 30 days? Plus, why do there have to be so many case plans?? Case plans are excessive and exhausting. The offender does not buy into them and quite often their plan or goal changes as soon as they walk out the door.	Changed language.
<i>Michelle Pisegna</i>					
1	Case Planning		general	I do not see where in the directive it says that the Facility case worker is responsible for the facility case plan	Updated.
2	Case Planning	34	general	Only Sex offender cases can be overridden with a Supervisors approval. Risk Management and Domestic Violence should have that option as well.	This was a policy decision.
3	Case Planning	35	17-25	The current format on OMS does not allow to place multiple restrictions. This needs to change to a format that we can give someone Travel restrictions, and contact restrictions.	This will be discussed as part of OMS request.
<i>Amber Gibbs</i>					
1	Case Planning	16	14	"specific Criminogenic Needs" The case plans in OMS do not match this request.... The BIG 4 Primary are: Antisocial Attitudes; Anti. Social peers; Antisocial Personality and His. Of antisocial Behavior. The Secondary Risk Factors are: Family; Prosocial leisure; Education/employment and Substance Abuse. The Currently Case Plan does not address the Big 4 Primary Risk Factors.....	Changed language.
2	Case Planning	16	17-18	Take out "Target the offender's top Four or Six Criminogenic Needs" Replace with "Identify Dynamic Risk Factors and develop interventions for Risk Reduction"	Thank you for your feedback.

3	Case Planning	16	34	LIKE THIS NOTE: Maybe BOLD TEXT would help it stand out more.	Thank you for your feedback.
4	Case Planning	19	1	Make this a Section title that Matches the rest; or Replace it with "Management and Administrative Codes&Projected Release Codes/Date"	Change
5	Case Planning	22	Column #1;row 3	Replace "Program Eligible" With "RRP Program Eligible "	This was intentional for VTPSA, but program eligible could incorporate more then RRP.
6	Case Planning	22	Column#1;row 3	2years prior to the inmates Min. Release Date: Change to "15 months prior to Min. Release date" Explanation: The RRP length can be up too 9 months long; plus if the RF window is approved that moves the Min. Release Date up 180 days sooner. 9months + 6months =15 months.	This was a conscious decision.
7	Case Planning	25	1st Column	"Program Refusal" Change too "RRP Program Refusal"	Language has been changed to further clarify.
8	Case Planning	25	2nd Column	Remove "and then every 6 months" B/C the Explanation states that the "codes partnership would remain until such time the i/m decides to program.	Will adjust explanation
9	Case Planning	19-31	TABLE	Some how make the PRC Deferral more clear; i.e.(CR; Min. Release; Max Release; Parole; Pre-Approved Furlough; Probation Rel.; RF; etc.) b/c I though there was a duplicate until I looked closer and realized its different PRC Codes.....	This is to be inclusive of all scearious.
10	Case Planning	31	4	Does this mean the Primary Dynamic Risk Factors (Big 4) or the Secondary Risk Factors(Small 4)?	You address the top 4-6 for the offender.
11	Case Planning	32	36	Put the Transitional Re-Entry Case Plan Section here. It shows the order that it should be completed in..... Then put the Community Case Plan Section to follow.	This was a conscious decision.

(Feel free to use additional space as needed)

Case Management
Victim Notification ... (pgs. 102-109)
Public Comment

COMMENT SHEET

Comm	Document:	Page #:	Line #:	Comment:	Response:
<i>Cara Cookson, Vermont Center for Crime Victim Services</i>					
1	Integration of Victim Notification and the Victim Services Unit	104	4	What is the relationship between an offender's SFI designation and the need for more specialized or dedicated victim services? What is the lag time between SFI or High Needs Designation and the victim services referral? Why does the "High Needs Case" category not expressly mention high risk domestic violence cases? In the event DVSIR is not implemented to identify high risk DV intimate partner cases, we suggest Victim Services referrals for any incarcerative-sentence DV cases as a means of funneling higher risk cases to victim services for specialized victim work.	SFI designation is resulting from severe mental health issues. These tend to produce a need for intensive victim coordination of services. This is why it falls into the referral category. These designations are internal and can be referred at any time once a CSS or criteria warrants a referral. We recognize the importance of DV cases and anticipate that many will fall in the high needs category for referrals. This will be highly trained to staff.
2	Integration of Victim Notification and the Victim Services Unit	107	3	Because under state law, Vermont is a right-to-request notification state instead of an opt-out state, we suggest that attempts to contact victims not listed in VANS be limited in order to minimize state's attorney victim advocate involvement in seeking out contact information. We recommend only seeking victim contact information where a victim is not registered in VANS for listed crime cases. We also urge the use of other DOC, state government (DCF, FSD, tax dept, etc) or community resources prior to contacting State's Attorneys for victim contact information.	Changed.
3	Integration of Victim Notification and the Victim Services Unit	106	Chart	Assuming final enactment of H.533, as of July 1, 2016, termination or discharge from probation will be among the statutory notifications that victims have a right to request.	Changed.
4	Integration of Victim Notification and the Victim Services Unit	108	19	A State's Attorney Victim Advocate might be a suitable alternative support person for PSA interviews in the event a VSS cannot be present or has not had an opportunity to develop a relationship with the victim or the victim's family.	This is not within the scope of this directive.
<i>Ellie Breitmaier</i>					

1	Integration of Victim Notification and the Victim Services Unit	104	1	Why are domestic violence cases or stalking cases not included here for referral to VSS. The DCF DVU is frequently contacting with VSS staff on these shared cases.	They fall under high needs cases and this will be further elaborated in training.
<i>Joel Machado</i>					
1	Integration of Victim Notification and the Victim Services Unit	102	22	Case Assignments. Keep it simple. When the person is in the community, the PO is responsible. When the person is in jail, the CSS is responsible. Making a transition to the PO prior to release (which is pinned to a release date) is not needed. Release dates often “appear” with less than 60 days’ notice. This is an area that Central consistently misses. Release dates are a moving target and can appear with little to no notice.	This decision was conscious to ensure that the victim would have a point of contact moving forward as part of release planning and reentry back into the community. This decision was made to ensure adequate time for safety planning and inclusion of necessary information that may impact release planning.
2	Integration of Victim Notification and the Victim Services Unit	103	6	This section is going to lead to confusion. If you have the body, the Victim is yours too. Keep it simple.	This decision was conscious to ensure that the victim would have a point of contact moving forward as part of release planning and reentry back into the community. This decision was made to ensure adequate time for safety planning and inclusion of necessary information that may impact release planning.
3	Integration of Victim Notification and the Victim Services Unit	104	4	Referring cases to VSS. I will reach out to VSS any case that I want to. Period. If I believe that I need the help of VSS, I will seek it. This entire section is useless.	Thank you for your feedback however referrals are limited for higher need cases that involve more victim specific knowledge, experience, and practice. These referrals will be monitored to ensure adherence to the directive and to inform training and capacity building needs.
4	Integration of Victim Notification and the Victim Services Unit	105	1	I have never reached out to VSS and been denied help from them. Please do not make a referral process. A simple phone call or email work every time when I reach out for assistance from VSS.	The referral process is necessary for quality assurance.

5	Integration of Victim Notification and the Victim Services Unit	107		9	I have never reached out to VSS and been denied help from them. Please do not make a referral process. A simple phone call or email work every time when I reach out for assistance from VSS.	The referral process is necessary for quality assurance.
6	Integration of Victim Notification and the Victim Services Unit	105	Grid		The statute for victim notification is very limited. 13 V.S.A. § 5563, 13 V.S.A. § 5410, 33 V.S.A. § 5233. Why does DOC need to add situations where victim notification must occur? Why does DOC add confusing timelines for notifications? Keep it simple. Stick to the Statute. We do not need 2+ pages of notification requirements when one sentence will do.	These notifications follow statute and timelines were established to meet best practices and to ensure public safety and risk reduction.
7	Integration of Victim Notification and the Victim Services Unit	107		2	This is a waste of time. If a victim wants to register on VANS, perfect. Statute does not require that DOC go out and “beat the bushes” looking for victims. The States attorney office VSS give the VANS contact info to victims. The DOC website has a link to VANS. It should not be the responsibility of the CSS class to hunt down victims. I have found that most victims do not want to be contacted by DOC. This is one of the reasons that only a small percentage of victims register on VANS. Searching the phone books and Google.com is not a good use of CSS time.	We have edited this section to limit extensive research to listed cases.
8	Integration of Victim Notification and the Victim Services Unit	107		3	If VANS is not to be “counted on”, and staff will be required to make manual notifications, then why does DOC spend the millions of dollars on VANS?	VANS is only one part of meeting victim notification and best practice. This practice reflects the DOC's goals, mission, and philosophy.
9	Integration of Victim Notification and the Victim Services Unit	107		3	6months to 1 year prior. Again, moving target and not always workable. Also, this paragraph is confusing. The “DOC liaison for Victims” will make the contact with the victim, record any issues and then forward this to the Facility CSS. According to this directives own chart, these two people are actually one person, the Facility CSS.	This is consistent with the new transition and reentry timelines and the Facility CSS may be the liaison or may not be.
10	Integration of Victim Notification and the Victim Services Unit	109		7	This is a waste of time for the CSS. VANS should be used to send this information to the victim upon registration with VANS. Why manually do something when there is an automatic system already in place?	This is best practice which reflects the DOC's mission.
<i>Cullen Bullard</i>						
1	Integration of Victim Notification and the Victim Services Unit	105		3	category for Death, section one identifies only the field notifying the VSS within 24 hours of a death, this should be for both field and facility as inmates do die while incarcerated and the field CSS may not know of the death until late in the process.	Changed.

<i>Tina Heywood</i>					
1	Integration of Victim Notification and the Victim Services Unit	109	7-10	<p>The directive says that the field/facility CSS shall send an initial introduction letter introducing themselves with necessary contacts and DOC's duties and obligations to the victims. I think this is a terrible idea to have a specific name associated to one of these initial letters because movement is constant. I don't want the victim to think that I am the contact person as the offender is moving from facility to facility. I think it is going to be frustrating for the victim, confusing too because this, "contact" person is going to change constantly depending on what facility the inmate is at and then once again when the offender is released to the community.</p>	The letter shall be sent at the initial contact.
2	Integration of Victim Notification and the Victim Services Unit	108	10	<p>it talks about whether the offender has a relief from abuse order, parental rights, visitation...etc...these are all family court matters that are not identified on the court calendar that we utilize nor in VCAS. So unless the order has made it to the core file we would have no way of knowing unless we literally called the court on every single case. These types of cases don't show up on the court calendar under identifiable means because some of them are associated with either victims or minors.</p>	These are general guidelines if dealing with the victim directly that you can ask and that would be helpful for supervision and release planning.
3	Integration of Victim Notification and the Victim Services Unit	108	31	<p>it says that victims of, "listed" offenses have the right to participate in parole board hearings. Perhaps I have it incorrect but I thought listed offenses implies a very specific group of offenders. It is my understanding that anybody can participate in parole board hearings...not just victims of, "listed" offenses.</p>	This is per statute, but parole board hearings are public and anyone can participate, however we do not provide notification for everyone.
4	Integration of Victim Notification and the Victim Services Unit	General		<p>we have always been taught, over and over, that we do not want to put victim information in our DOC database because it is NOT confidential, it can be subpoenaed. Are we no longer concerned about this?</p>	This is being dealt with the APA rulemaking and victim information and confidentiality will be maintained.

5	Integration of Victim Notification and the Victim Services Unit	General		<p>I am very concerned about the limitations this directive puts on facility and field CSS. This directive is diminishing our capacity to utilize VANS and the VSS to effectively manage a case where there are significant victims issues. Its actually offensive that someone would say that in order for us to confer with a VSS that I need to get approval first. Its offensive that someone would identify very specific criteria when we can only utilize a VSS for problem cases. I think this is sending the wrong message. I personally have never been told by a VSS that I should have handled something by myself and not to call them. They have always been informative, helpful and appreciative that I reached out to them. Its not that I was attempting to, "pass the buck" it was that I was trying to practice diligence with the victim at the center of my plan to address them as professionally and efficiently as possible.</p>	Thank you for your feedback.
6	Integration of Victim Notification and the Victim Services Unit	General		<p>When we are making statements about the facility/field CSS reaching out to victims that encompasses a large number of people. More times than not you can always find a, "victim"; GL, PL, PSPM, DC, LSAM....not just listed, violent offenses have, "victims". Typically victims of non violent misdemeanor offenses are not registering in VANS. So if I interpret the directive correctly we are now saying that I must try every means possible to track down one of these people using google, white pages, etc. There isn't possibly enough hours in the day to do this.</p>	This has been changed to limiting the extensive outreach to listed offenses.
7	Integration of Victim Notification and the Victim Services Unit	General		<p>If nothing changes and this directive goes through with these new mandates then I suggest that at any time if a victim says to us that they do not want to be contacted that we document that somewhere and we don't contact them....period. We need to give the victims back power, something they lost during the crime against them. If they want to be contacted that the Department of Corrections has an obligation to that person and I absolutely make the connection between best practice. But in the next breathe, if the victim does not want to be contacted and feels like they are being victimized all over again or end up reliving the crime each and every time they are contacted then we are doing more harm than good. Let them choose.</p>	The DOC recognizes this and it should be documented in a victim contact note.
Stephen Russell					

	Integration of Victim Notification and the Victim Services Unit	102-109		<p>There was a lot of discussion in regards to communication with victims when VANS was brought online. Also, the VSS positions were created so we would have staff that were specifically trained to deal with this sensitive subject. The procedures outlined on these pages duplicate services, increase work load, and increase the chances of untrained staff revictimizing and traumatizing the people it is intended to help. Victims have the option of requesting notification but they also should be empowered to make the personal choice not to as well. This is a decision that we should not be making, nor assuming for them. We have spoken with victim services and they do not support these new procedures either. What we are proposing to do here is eliminate two valuable resources, VANS and VSS. VANS has the capability of printing reports that will confirm with 100 percent accuracy that victims were/were not notified. VANS will also notify victims when offenders are w/in 30 days of a scheduled Parole Board hearing. To ensure victims have input in the case planning process, they should be provided the CSS's contact information by the contact method of their choice. If a victim has not registered in VANS as a direct victim these people have the right to decide whether they want to be contacted or not.</p> <p><input type="checkbox"/></p>	The DOC recognizes this and it should be documented in a victim contact note if the victim explicitly states that they do not want to be contacted. However the DOC recognizes that lack of registration does not correlate with desire for notifications/participation.
<i>Shawn Baraw</i>					
1		102	4	"take" not "takes"	Changed.
2		102	23-28	seems like a long winded way to say the assigned facility or field CSS will be the responsible for ensuring statutorily required notifications are completed and to act as a liaison for victims. A VSS may act as the liaison for victims in some circumstances.	Thank you for feedback.
3		103		under facility CSS "straight detainees" should say "detainees" a detainer is a document, a detainee is the person being detained.	Changed.
4		103		The chart "staff roles" does not clearly define who will complete statutorily required notifications for the cases identified or what the staff role is. Is it labeled incorrectly?	Added clarifying language.
5		104	25	wording, recommend using "liaison" instead of staff member for consistency.	Changed.
6		106		should there be more specificity on how the notification should be made? Email, phone, certified letter?	Email or phone per victim's request.

7		107	4	historical practice was the victim of a crime who wanted notification had to inform the DOC of their desire for notification. This served two ends, it allowed victims a choice to be notified as many do not want to be informed as it can re-traumatize them, and it saved staff a lot of time trying to identify who and where victims are to complete notification. Imagine trying to track down the John Smith who was a burglary victim in Chittenden or Rutland Counties.	This new standard aligns with current victim service best practice.
8		107	13	16 limits staff access to VSSes. This is concerning.	Thank you for your feedback.
9		107	17	encourages jumping chain of command. CSSes should not be encouraged to go directly to the director level. This should be channeled through a supervisor.	This is for consultation only, the referral process requires supervisor approval. Consultations however want to account for timely responses and to reduce barriers between CSS staff and VSS staff.
10		108	40	“reasonable efforts” is very subjective.	This is not subjective as it will be outlined what the expectation and standard is through training.
11		108	General	General victim question: how are victim’s identified? VANS allows interested parties to register for notifications. How will staff tease apart who is a direct victim and who is a interested party?	Direct victims or affected persons are registered in VANS as such. This can always be verified through affidavit.
<i>Network Against Domestic and Sexual Violence</i>					
1	Integration of Victim Notification and the Victim Services Unit	General		<ul style="list-style-type: none"> • We appreciate the DOC’s willingness to share these draft directives and provide opportunities for stakeholder comment. • Victims’ wishes regarding notification and communication (both through the VANS system) and by Victim Services should be honored. Effective procedures should be put into place to ensure that victims who would like additional services and notifications have their needs met. Conversely, the privacy and self-determination of victims who do not wish to have notifications should be honored. It is difficult to discern from these directives how this will be achieved. 	The DOC recognizes this and it should be documented in a victim contact note if the victim explicitly states that they do not want to be contacted. However the DOC recognizes that lack of registration does not correlate with desire for notifications/participation.
2	Integration of Victim Notification and the Victim Services Unit	General		<ul style="list-style-type: none"> • We recommend that high risk domestic violence cases be referred to DOC’s Victim Services. High risk could be determined using the DVSIR or by referring all victims of incarcerated domestic violence offenders to victims services. 	This falls under high need cases which are able to be referred. This will be extensively trained.
<i>Seth Page</i>					
1		103+104	10-24	This is too much responsibility for us field officers. And causes unnecessary work that is done by the VANS system. This could victimize the victims by having us contact them too often. Also 3 days is too short of time to notify the victim.	Thank you for your feedback.

<i>Breanne MacFarland</i>					
1		103	10-24	This is too much responsibility for us field officers. And causes unnecessary work that is done by the VANS automated system already. If the victim is registered in VANS then a notification should not be necessary for the CSS's to complete. This could victimize the victims by having us contact them too often. Also 3 days is too short of time to notify the victim. This officer would suggest or request 5.	Thank you for your feedback.
2		107		This page talks a lot about victim notification and how VANS may, or may not work, so we still need to make those calls. If VANS is operating so poorly, then why are we not seeking alternative automated systems?	VANS is only one part of meeting victim notification and best practice. This practice reflects the DOC's goals, mission, and philosophy.
<i>Jonathan Robinson; Ethan Bacon</i>					
1		103	10-24	This is too much responsibility for us field officers. And causes unnecessary work that is done by the VANS automated system already. If the victim is registered in VANS then a notification should not be necessary for the CSS's to complete. This could victimize the victims by having us contact them too often. Also 3 days is too short of time to notify the victim. This officer would suggest or request 5.	Thank you for your feedback.
2		107		This page talks a lot about victim notification and how VANS may, or may not work, so we still need to make those calls. If VANS is operating so poorly, then why are we not seeking alternative automated systems?	VANS is only one part of meeting victim notification and best practice. This practice reflects the DOC's goals, mission, and philosophy.
<i>Jill Anderson</i>					
1		103	10-24	This is too much responsibility for us field officers. And causes unnecessary work that is done by the VANS automated system already. If the victim is registered in VANS then a notification should not be necessary for the CSS's to complete. This could victimize the victims by having us contact them too often. Also 3 days is too short of time to notify the victim. This officer would suggest or request 5.	Thank you for your feedback.
<i>Amy Jacobs</i>					
1		103+10 4	10-24	This a lot of notification – will it be too much for the victims – and is 3 day enough notice?	Notification is determined by statute and victim best practice.
<i>Rae Hirst</i>					
1		103	10-12	What's the rationale behind using the field CSS to make the contact 60 days prior to release and not the facility CSS?	This decision was conscious to ensure that the victim would have a point of contact moving forward as part of release planning and reentry back into the community. This decision was made to ensure adequate time for safety planning and inclusion of necessary information that may impact release planning.

2		104	1-2	Is there a way to say this differently where staff won't feel devalued for asking for VSS assistance?	Changed.
3		106	Death Notification	Death Notification – ? if should be a trained professional or should be done in person?	No we are required to give this notification.
4		107	5	add Law Enforcement.	Changed.
<i>Mary Jane Ainsworth</i>					
1		106	6	I would recommend replacing "the booking officer" with VANS.	No, this is to account for timeliness.
2		107	8	Add word "Victim" after OMS's	Changed.
3		107	26-28	Should something be placed in this line indicating that all of this will be documented in the Victim Contact Note? Or a separate section about documenting information in the Victim Contact Note?	This information will be added.
<i>Jess Dorr</i>					
1				<p>I had some last minute thoughts that I wanted to submit about the guidance doc before the public comment period closes today:</p> <p>When staff make a referral to VSU (case referral, RSN, case staffing assistance, etc...) we would like to develop an actual referral form that will contain the various pieces of information that we need in order to follow up in a timely way. This would be housed in the overall Victim Contact Manual that I would like to develop. Should there be anything in the guidance doc about additional resources that will be made available in that manual?</p> <p>I am also wondering how VSS will become involved with cases where the original charge would have constituted VSS involvement, but due to defense tactics or legal maneuvers the conviction is much less. Can we create some language that will account for that dynamic?</p> <p>Will we be going back into the directive to change language in the contact notes section to account for the development of a distinct victim case note in OMS?</p>	Will discuss with Director of Victim Services.
<i>Timothy Simoneau</i>					

1			General	<p>I would request that extensive training be provided on how to speak with victims, as from the facility point of view, talking with inmates every day is not like talking with victims every now and then. This should also be completed prior to implementation of this section of Directive #371.02. This is a big change from current practice</p> <p>Where will the information be kept for when inmates are transferred from site to site. Meaning, when I have found a victim through a search and then the inmate is transferred to another facility for population management purposes?</p>	This will all be done with training.
2		103	10-12	<p>Change 60 days prior to release from facility the field CSS becomes the "DOC liaison for victims" and is responsible for all victim notifications, contact, updated and communication requirements. --> 60 days prior to Projected Release Date (PRD) from facility the field CSS becomes the "DOC liaison for victims" and is responsible for all victim notifications, contact, updated and communication requirements.</p> <p>(Reasoning) This will tie victim transition to PRD so that a firm date is set and both field and facility CSS have something to work off of.</p>	Changed.
3		105	3	<p>Change "Facility CSS notifies VSS at 60 days prior to release" to "Facility CSS notifies VSS at 60 days prior to PRD" (Reasoning - sets a firm date to work off of)</p>	Changed.
4		106	6	<p>Change in timeline column "45 days prior to release" to "45 days prior to PRD" (Reasoning - sets a firm date to work off of)</p>	Changed.
5		107	2-5	<p>How will this be completed as most victims are listed as initials? Where will this confidential information be logged so that others who need it will have access? Victim notifications from the State's Attorney's Office are no longer in the core file.</p>	There will be further details surrounding victim information and entry into OMS.

Case Management
 Contact Notes ... (pgs. 80-83)
 Public Comment
COMMENT SHEET

Comr	Document:	Page #:	Line #:	Comment:	Response:
				<i>Joel Machado</i>	
1	Contact Notes	80	18	“Supervision: Supervisors monitor contact notes to support staff”. Let’s be honest here, reviews of Case notes are a training tool for supervisors.	Thank you for your feedack.
2	Contact Notes	80	30	“Please note the DOC does have a policy which governs staff access to offender information”. Why just a reference, with 109 pages, might as well put that in here also.	Thank you for your feedack.
3	Contact Notes	80	35	“Do not make your own diagnosis or conclusions. –Staff are trained to assess inmates based on many factors to arrive at conclusions that may be considered opinion. I would document a “conclusion” with a statement like “I believe John Doe is lying to me based on him telling me this when in fact, it is that.” or “I believe John Doe is minimizing his sex offender summary base on the differences between his report and the affidavit”. By not allowing staff to express their professional opinions (with evidence) you are limiting our usefulness and not allowing staff to communicate with other staff effectively.	This is for documenting substantiated facts, and not opinions.
4	Contact Notes	80	37	There should be allowable acronyms that are not considered “short hand”. Things such as NSCF, P&P, DM, PO and CSS should be allowed.	By acronyms we mean none established DOC acronyms.
5	Contact Notes	81	17	“Date of Contact: The date and time will auto-populate”. This is untrue, OMS does not auto-populate this in case notes.	Any OMS functionality will be there for the effective date.
6	Contact Notes	83	3	“Victim Services/Contact” VSS staff in Central office have been directing staff to NOT put victim issues into Case notes. Case Notes are not confidential and can be obtained by the offender. Victim issues should be kept in accordance with direction from and at the VSS office. See page 107 line 26 to 28.	This is changing and the DOC is ensuring victim confidentiality.

				Missing from Directive - Case notes such as “Attended unit REC meeting” or “Refused meds” or “Issued C-Pap Machine” should be eliminated. Also, staff have been using Case Notes to document minor DR sanctions, “Completed ORAS”, updated visiting list or other items that are documented in OMS in different areas.	Any category not listed has been intentionally eliminated. The new contact note is different then the historic contact note usage. Much of the information that use to be contact notes is not located in other areas and needs to be placed in there as such.
7	Contact Notes	80	General		
<i>Shawn Baraw</i>					
1	Contact Notes	81	9	recommend replacing observational with observable.	Changed.
2	Contact Notes	81	15	remove “which” for readability.	Changed.
3	Contact Notes	82	39+40	replace one of the “related” with pertaining for readability.	Changed.
<i>Kelly Chamberlain</i>					
1	Contact Notes	82	2	It’s a little unclear which location is being referenced. Is it the location where the contact took place or the location where the author of the note is at the time they enter the note?	Where the author is when the contact took place.
2	Contact Notes	82	12	It’s a bit unclear how the contact notes will interact with the case plan. Given that some information from the contact notes will influence the case plan; should casework staff enter that same information again in the case plan or just reference the notes? I realize duplication is not wanted, but if entries are to be uniform, there needs to be more specification on this.	There should be no duplication between case plan and contact notes, rather the contact notes should discuss progress of the case plan, and the case plan should be updated based on that progress.
3	Contact Notes	83	12	Shouldn’t there be some sort of categorization for a held appointment with the offender? Even if the case plan is discussed; there should be a contact note stating, “Appointment held with John Doe. We discussed and updated his case plan. Please see Case Plan updated on XX/XX for details.” I think this would also allow a clearer interaction between the contact notes and the case plan when reviewing a file.	We have provided additional language surrounding motivate/treat.
<i>Breanne MacFarland</i>					
1	Contact Notes	80	3	Strike the word “and” in “with and state or federal”	Changed.
2	Contact Notes	81	17	OMS does not auto populate the date and time. Line 34-35 – there is a Co-case Management, but no Management. Please add Management which can be used when talking with a Supervisor about the case or checking GPS points.	Any OMS functionality will be there for the effective date.
<i>Jonathan Robinson</i>					

1	Contact Notes	81	17	OMS does not auto populate the date and time. Line 34-35 – there is a Co-case Management, but no Management. Please add Management which can be used when talking with a Supervisor about the case or checking GPS points.	Any OMS functionality will be there for the effective date.
2	Contact Notes	84	25	List out “big 4”. We don’t need to coin a new term.	
<i>Ethan Bacon</i>					
1	Contact Notes	81	17	OMS does not auto populate the date and time. Line 34-35 – there is a Co-case Management, but no Management. Please add Management which can be used when talking with a Supervisor about the case or checking GPS points.	Any OMS functionality will be there for the effective date.
2	Contact Notes	84	25	List out “big 4”. We don’t need to coin a new term.	
<i>Mary Jane Ainsworth</i>					
1	Contact Notes	81	17	Remove, "The date and time will auto-populate.....of the contact" this is no longer true. Replace with, "Enter the actual date and time of the contact."	Changed.
2	Contact Notes	81	36-37	These are the types of contact not a categorization. Should they be referenced above.	Changed.
3	Contact Notes	82	6	This is labeled as "Jail" in OMS. Should it be changed to reflect what's on this line?	Yes.
4	Contact Notes	83	3-8	Suggest removing this as we are moving to a separate victim contact note.	This is still a contact notes.
5	Contact Notes	83	9-11	Work crew is CRP. It was referenced as Community Resitution Program earlier. Should this be changed to Community Restitution Program?	No because its generic.
<i>Amber Gibbs</i>					
1	Contact Notes	80	12	Remove "behavior" as it seems to reference Misconduct which should be noted to be documented in the Incident Report section of OMS.	Changed.
2	Contact Notes	80	18	"Supervisors monitor contact notes to provide support for staff.	Changed.
3	Contact Notes	80	33-34	Use Bold Lettering for " Be Specific and Objective; "	No for formatting requirements.
4	Contact Notes	80	35-36	Use Bold Lettering for " Do not make your own diagnosis or conclusions "	No for formatting requirements.
5	Contact Notes	80	39-40	Use Bold Lettering for " Author can reference Something in OMS Such as noting an incident report # or assessment was completed "	No for formatting requirements.

(Feel free to use additional space as needed)

Case Management
Case Staffings
Public Comment
COMMENT SHEET

Comment #:	Document:	Page #:	Line #:	Comment:	Response:
<i>Joel Machado</i>					
1	Case Staffings	94	Case Staffings	I believe that the Case Staffing report is a complete waste of time. All the information on the report is in OMS. This report allows Central office to avoid the effort of looking up the case in OMS. I have even participated in Central staffing's were staff from Central ask questions that were already answered on the staffing report. This shows that they did not even bother to read the report that was submitted. The rational/narrative portion can simply be typed into Case Note for viewing at the staffing. Please eliminate case staffing reports and create a case staffing case note summary.	Thank you for your feedback. This is a legal document that is necessary and provides a history of efforts and accountability.
2	Case Staffings	94	Checklist	Several points about this check list. I was always told that a PSI is the property of the court and that all copies should be returned at or near sentencing? Record Checks. I have been told repeatedly that record checks should not be faxed, email or mailed. I have been told that this is a law? Affidavits and Mitts. If I am going to scan these documents for any purpose, I will upload them to OMS. Staff should be using this practice state wide for all purposes to include reviewing them for staffing's.	The checklist is to ensure necessary documents are provided for the staffing.
3	Case Staffings	94	18, item 5	This statement is too vague. If the field and facility disagree, then who requests a staffing? If neither request, who wins? If the PO and I both think the other is wrong and there is stalemate, how do you resolve this? This statement will not help in this type of situation. When the inmate is in jail, the Facility CSS will have to do the staffing to get some movement on the case. This will dictate that Facility staff will be requesting a majority of the staffing's, all the PO needs to do is deny and sit back. No effort required.	Whom ever is responsible for the staffing completes the forms as stated, if differing opinions these can be presented at the time of the staffing.
4	Case Staffings	95	8	Case Staffing for a CVS override. Bad idea and wasteful.	Thank you for your feedback.
5	Case Staffings	96	35	If the case (parole revocation) needs to be centrally staffed... Why would a PV ever need to be staffed? PV cases are HWOB on the VOP.	A parole violation would not have to be staffed, a parole revokation as written needs to be staffed in order to determine other release options.

				<p>If a Furlough revocation is staffed locally and the local staffing result is longer than 15 days, then the case must be staffed by Central Office. This does not work. The local staffing should be completely skipped. This can be done because the PO knows what they are going to ask for in the local staffing with the DM. With the time frames of the local staffing, then the wait period for a central staffing to be held, we are looking at 30 days plus just to get the case to the CO staffing. If CO denies the PO request for more than 15 days, the door is being closed after the horse has already fled. All P&P has to do is refer a case for Central Staffing and it will be an automatic 30 day hit for the inmate due to time frames.</p>	<p>Local staffings can only hold someone for 15 days, no one can remain incarcerated past this time without direct approval from Central Office.</p>
6	Case Staffings	97	11		
				<p>Direct Community Placement. This staffing process is backwards. A staffing should be requested to approve a DCP case. Most Max out cases are either not case plan compliant, do not want to participate in FSU, have no residence or burned all their bridges with community supported housing or are too dangerous to release. These cases need approval by Central not denial.</p>	<p>Changed.</p>
7	Case Staffings	100	30		
				<p>Community Notification. This entire process should be merged with the RSN and here is why. The type of inmate that would be staffed for CN are, High risk sex offender, RSN, and Level C. These cases should all be automatic "if you are a (blank) then you will be CN also. If we are going to take the time to do the staffing for RSN, HRSO and "C" staffings, why double our efforts?, Automatically notifying the community is a good idea anyway. DOC will never have bad press from too much communication with the community. We are constantly in the media for lack of notification.</p>	<p>Thank your for your feedback.</p>
8	Case Staffings	101	5		
<i>Cullen Bullard</i>					
				<p>Custody Classifications needs to be removed from this override process. We are creating a separate custody classification override process.</p>	<p>This will be able to change once the new process is effective.</p>
1	Case Staffings	95	5 to 15		
				<p>If the plan is to take the person directly out on furlough does case staffing process need to be held or can the PO take the person directly out on furloug?</p>	<p>As long as it is less then 15 days then it is a local decision.</p>
2	Case Staffings	96	27-34		
				<p>Level C dsignation process outlined does not follow the current directive.</p>	<p>This is the expected process.</p>
3	Case Staffings	99	33-40		
<i>Shawn Baraw</i>					
				<p>"This is where approvals, reviews, and determinations are made for cases requiring a decision." A decision about what? For what purpose? Is it outside of the norm or not covered by other policy or directive?</p>	<p>Changed.</p>
1	Case Staffings	94	3		

2	Case Staffings	94	Central office director staffing	recommend adding “requires” specific director approval.	Changed.
3	Case Staffings	94	Central Office Case Staffing	what is the criteria or threshold of need that warrants a CO staffing? Why do we go here?	See further descriptions later in the document.
4	Case Staffings	94	8	replace “on” with “for”	Changed.
5	Case Staffings	95		why is a central office director staffing required for a parole revocation? Was the intent for sex offender parole recommendation?	It is only required if the local site plans to keep the offender in for more than 15 days.
6	Case Staffings	96	28-34	Does a staffing need to be conducted prior to filing a violation with the parole board or does this occur after parole has been revoked to determine the best course of action, such as release on furlough, retain incarcerated for a punitive sanction, or refer to RRP? This section is not clear. What is the intent?	No, this section is only for revocation.
7	Case Staffings	101	7	“high risk offenders” does this mean all offenders who score as high risk on a risk assessment or those who are designated RSN or Level C?	See lines 12-13 for details.
8	Case Staffings	101	21	appears to have been cut and pasted from page 100 line 25.	Changed.
<i>Seth Page</i>					
1		95	Local Determinations	This has limited the scope at which we can incarcerate offenders that have committed serious offenses. I believe Local determinations should be allowed to hold offenders for 30 days of incarceration. 15 Days is not enough time for us to complete the central office paperwork, and to complete the local determinations. For example John Smith goes to jail on 5/11. John Smith would need to be seen for a Central Staffing on 5/25, any time further would be in violation of the new directive, and Central Case Staffing’s are only every 2 weeks. So we have 4 business days to complete the NOS hearing, then an additional 3 business days to complete the local determination. That brings us to 5/19, where we are already less than one week away from when the central case staffing is. We are also required to get the central case staffing form to central a week before the case staffing. As I stated not only are we less than a week from the case staffing by 5/19, but the case staffing form is very lengthy, and requires much time to complete. They sometimes need 3 days, to investigate, and gather information. The point is with all these factors, which regularly occur, it would be impossible not to pass the 15 day mark while trying to hold someone for a central level case staffing.	Furlough violation staffings are weekly to accommodate these timelines. The fifteen days is to ensure best corrections practice.

2		95		Holding offenders on new charge, we should have the power in local determinations to hold offenders for any violent offense. It currently states "violent listed". This means that locally we would not be able to hold offenders for Violent Misdemeanors, such as Simple Assault, or Assault on Law Enforcement Officer, Lewd Act, Unnecessary Restraint, etc... We are putting the community at risk for allowing many of these offenders out in the community.	Thank you for your feedback this is a conscious decision.
1		95		It is also of my opinion that the Central office case staffing form is entirely too lengthy. It takes too much time to fill out, time that we do not have. Is it possible to have a form that is not as lengthy so that we can hold offenders in jail for up to 90 days?	The form is going into OMS and there will be changes. And no, there is no ability to make a local determination to hold an offender beyond 15 days.
<i>Breanne MacFarland</i>					
1		95		Local Determination. This has limited the scope at which we can incarcerate offenders that have committed serious offenses. I believe Local determinations should be allowed to hold offenders for 30 days of incarceration. 15 Days is not enough time for us to complete the central office paperwork, and to complete the local determinations. For example John Smith goes to jail on 5/11. John Smith would need to be seen for a Central Staffing on 5/25, any time further would be in violation of the new directive, and Central Case Staffing's are only every 2 weeks. So we have 4 business days to complete the NOS hearing, then an additional 3 business days to complete the local determination. That brings us to 5/19, where we are already less than one week away from when the central case staffing is. We are also required to get the central case staffing form to central a week before the case staffing. As I stated not only are we less than a week from the case staffing by 5/19, but the case staffing form is very lengthy, and requires much time to complete. They sometimes need 3 days, to investigate, and gather information. The point is with all these factors, which regularly occur, it would be impossible not to pass the 15 day mark while trying to hold someone for a central level case staffing.	Furlough violation staffings are weekly to accommodate these timelines. The fifteen days is to ensure best corrections practice.
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3		95	<p>It is also of my opinion that the Central office case staffing form is entirely too lengthy. It takes too much time to fill out, time that we do not have. Is it possible to have a second form? A smaller form for incarceration requests under 90 days and then the normal Central Staffing form for more than 90 days?</p>	<p>The form is going into OMS and there will be changes. And no, there is no ability to make a local determination to hold an offender beyond 15 days.</p>
4		98	<p>This talks about central case staffings for sex offenders and what will be attached to these. Two documents are listed which I've never heard of. One is the Sex Offender Risk and Needs Form? The other is Reducing Service Plan. I've been supervising sex offenders for six years and never heard of either of these two documents. If they are adding more forms and reports to the case staffing that is probably not needed. We already attach all psychosexual evaluations and treatment summaries to them, which tell their story well enough.</p>	<p>These forms have been updated and will be part of the signed directive.</p>
5		99	<p>This indicates we still need to get central office approval to give a sex offender a positive recommendation for parole. I've always wondered why we needed this approval as a sex offenders supervision status doesn't determine their supervision level. Our grid is determined by the VASOR II and SOTPS scores. Basically when a sex offender makes parole, not much really changes. They are allowed to leave the state with a travel permit, but that is about it. Their supervision level stays the same.</p>	<p>This is law.</p>
<p><i>Jonathan Robinson</i></p>				

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<i>Ethan Bacon</i>					
1		95		<p>Local Determination. This has limited the scope at which we can incarcerate offenders that have committed serious offenses. I believe Local determinations should be allowed to hold offenders for 30 days of incarceration. 15 Days is not enough time for us to complete the central office paperwork, and to complete the local determinations. For example John Smith goes to jail on 5/11. John Smith would need to be seen for a Central Staffing on 5/25, any time further would be in violation of the new directive, and Central Case Staffing's are only every 2 weeks. So we have 4 business days to complete the NOS hearing, then an additional 3 business days to complete the local determination. That brings us to 5/19, where we are already less than one week away from when the central case staffing is. We are also required to get the central case staffing form to central a week before the case staffing. As I stated not only are we less than a week from the case staffing by 5/19, but the case staffing form is very lengthy, and requires much time to complete. They sometimes need 3 days, to investigate, and gather information. The point is with all these factors, which regularly occur, it would be impossible not to pass the 15 day mark while trying to hold someone for a central level case staffing.</p>	Furlough violation staffings are weekly to accommodate these timelines. The fifteen days is to ensure best corrections practice.
2		95		<p>Holding offenders on new charge, we should have the power in local determinations to hold offenders for any violent offense. It currently states "violent listed". This means that locally we would not be able to hold offenders for Violent Misdemeanors, such as Simple Assault, or Assault on Law Enforcement Officer, and Lewd Act. We are putting the community at risk for allowing many of these offenders out in the community.</p>	Thank you for your feedback this is a conscious decision.
3		95		<p>It is also of my opinion that the Central office case staffing form is entirely too lengthy. It takes too much time to fill out, time that we do not have. Is it possible to have a second form? A smaller form for incarceration requests under 90 days and then the normal Central Staffing form for more than 90 days?</p>	The form is going into OMS and there will be changes. And no, there is no ability to make a local determination to hold an offender beyond 15 days.

		98		This talks about central case staffings for sex offenders and what will be attached to these. Two documents are listed which I've never heard of. One is the Sex Offender Risk and Needs Form? The other is Reducing Service Plan. I've been supervising sex offenders for six years and never heard of either of these two documents. If they are adding more forms and reports to the case staffing that is probably not needed. We already attach all psychosexual evaluations and treatment summaries to them, which tell their story well enough.	The form is going into OMS and there will be changes. And no, there is no ability to make a local determination to hold an offender beyond 15 days.
		99		This indicates we still need to get central office approval to give a sex offender a positive recommendation for parole. I've always wondered why we needed this approval as a sex offenders supervision status doesn't determine their supervision level. Our grid is determined by the VASOR II and SOTPS scores. Basically when a sex offender makes parole, not much really changes. They are allowed to leave the state with a travel permit, but that is about it. Their supervision level stays the same.	This is law.
<i>Amy Jacobs</i>					
1		95		Local Determination. Recommendation to change back to 30 day interrupt at the local level.	Thank you for your feedback, this was a conscious decision.
2		95		Holding offenders on new charge, local staffing should be able to determine to hold an offender if the new charge is risk related	Thank you for your feedback, this was a conscious decision.
<i>SPPP</i>					
1		94		If we can only give 15 days, why would we go through the NOS process when you could offer a grad sanction and get 15 days? #5 – The CSS that isn't responsible for the staffing should be able to provide input into the case staffing from before it is submitted.	A grad sanction can only be for 5 days per current policy. Per #5 you can and you should.
2		96	3	What is the case staffing checklist and approval form?	This is a new form being developed.
3		96	32-34	need clarification as it is not clear.	Changed.
4		97	10-12	same as page 96, not clear. Maybe separate into 2 sentences?	Changed.
<i>Mary Jane Ainsworth</i>					
1	1	95	6	Should this line be bolded?	No, this is formatted.
2	2	95	9	What is a custody classification override?	When it doesn't follow process.
3	3	94-101	General	There may need to be some wording changes in this section with the creation of the staffing form in OMS. Once I have it built, I will be more than happy to make the changes necessary.	Sounds great!
4	4	98	3	Should this line be bolded?	No, this is formatted.
<i>Jill Anderson</i>					

1		95	<p>Local Determination. This has limited the scope at which we can incarcerate offenders that have committed serious offenses. I believe Local determinations should be allowed to hold offenders for 30 days of incarceration. 15 Days is not enough time for us to complete the central office paperwork, and to complete the local determinations. For example John Smith goes to jail on 5/11. John Smith would need to be seen for a Central Staffing on 5/25, any time further would be in violation of the new directive, and Central Case Staffing's are only every 2 weeks. So we have 4 business days to complete the NOS hearing, then an additional 3 business days to complete the local determination. That brings us to 5/19, where we are already less than one week away from when the central case staffing is. We are also required to get the central case staffing form to central a week before the case staffing. As I stated not only are we less than a week from the case staffing by 5/19, but the case staffing form is very lengthy, and requires much time to complete. They sometimes need 3 days, to investigate, and gather information. The point is with all these factors, which regularly occur, it would be impossible not to pass the 15 day mark while trying to hold someone for a central level case staffing.</p>	<p>Furlough violation staffings are weekly to accommodate these timelines. The fifteen days is to ensure best corrections practice.</p>
2		95	<p>Holding offenders on new charge, we should have the power in local determinations to hold offenders for any violent offense. It currently states "violent listed". This means that locally we would not be able to hold offenders for Violent Misdemeanors, such as Simple Assault, or Assault on Law Enforcement Officer, Lewd Act, Unnecessary Restraint, and Stalking. We are putting the community at risk for allowing many of these offenders out in the community.</p>	<p>Thank you for your feedback this is a conscious decision.</p>
3		95	<p>It is also of my opinion that the Central office case staffing form is entirely too lengthy. It takes too much time to fill out, time that we do not have. Is it possible to have a form that is not as lengthy so that we can hold offenders in jail for up to 90 days?</p>	<p>The form is going into OMS and there will be changes. And no, there is no ability to make a local determination to hold an offender beyond 15 days.</p>
<p><i>Amber Charbonneau</i></p>				

1		General		<p>-Local case staffings still should be able to interrupt for 30 days, not 15. It is a lot of work to prepare a central case staffing to try to get more time that is warranted. The case staffing paperwork should also be shortened and streamlined. Between local case staffing form and central case staffing form it should be one with just a drop down menu to choose which one you are doing.</p> <p>-We should be able to hold people when they are picking up new charges, especially if they are risk related, or they continually are picking up new charges that may be minor but are causing harm to the community such as retail thefts/petty larcenies etc.</p>	Furlough violation staffings are weekly to accommodate these timelines. The fifteen days is to ensure best corrections practice.
<i>Michelle Pisegna</i>					
1		95		<p>Local Determination. This has limited the scope at which we can incarcerate offenders that have committed serious offenses. I believe Local determinations should be allowed to hold offenders for 30 days of incarceration. 15 Days is not enough time for us to complete the central office paperwork, and to complete the local determinations. For example John Smith goes to jail on 5/11. John Smith would need to be seen for a Central Staffing on 5/25, any time further would be in violation of the new directive, and Central Case Staffing's are only every 2 weeks. So we have 4 business days to complete the NOS hearing, then an additional 3 business days to complete the local determination. That brings us to 5/19, where we are already less than one week away from when the central case staffing is. We are also required to get the central case staffing form to central a week before the case staffing. As I stated not only are we less than a week from the case staffing by 5/19, but the case staffing form is very lengthy, and requires much time to complete. They sometimes need 3 days, to investigate, and gather information. The point is with all these factors, which regularly occur, it would be impossible not to pass the 15 day mark while trying to hold someone for a central level case staffing.</p>	Furlough violation staffings are weekly to accommodate these timelines. The fifteen days is to ensure best corrections practice.
2		95		<p>Holding offenders on new charge, we should have the power in local determinations to hold offenders for any violent offense. It currently states "violent listed". This means that locally we would not be able to hold offenders for Violent Misdemeanors, such as Simple Assault, or Assault on Law Enforcement Officer, Lewd Acts, etc.. We are putting the community at risk for allowing many of these offenders out in the community.</p>	Thank you for your feedback this is a conscious decision.

3		95	It is also of my opinion that the Central office case staffing form is entirely too lengthy. It takes too much time to fill out, time that we do not have. Is it possible to have a form that is not as lengthy so that we can hold offenders in jail for up to 90 days?	The form is going into OMS and there will be changes. And no, there is no ability to make a local determination to hold an offender beyond 15 days.
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(Feel free to use additional space as needed)

Case Management
Transition and Reentry (pgs. 39-49)
Public Comment

COMMENT SHEET

Com#	Document:	Page #:	Line #:	Comment:	Response:
<i>Cara Cookson, Vermont Center for Crimin Victim Services</i>					
1	Transition and Reentry	40	General	DVSIR instrument should be used as the risk assessment tool for domestic violence cases. The ORAS does not evaluate lethality risk. Lethality risk assessment is vital to transition and re-entry case planning with victims and for planning with respect to other family and social relationships.	The tool is being used and the DOC is preparing to resume training and direction.
2	Transition and Reentry	44	General	the DVSIR should be considered in domestic violence in order to consider additional risk-reducing measures for high risk cases	The tool is being used and the DOC is preparing to resume training and direction.
<i>Joel Machado</i>					
1	Transition and Reentry	39	5	Again, Central Office and the authors of this draft Directive do not understand that "Projected Release Date" is completely dynamic and always subject to change. Attaching timelines to some future date that may or may not change is futile. Often times, inmates that complete VTPSA are shipped to NSCF with no release planning done. Inmate that come back from OOS with less than 6months do not fit into any of these timelines. Inmates that have convictions overturned, additional credit applied, work camp removals, Major DRs' and many other factors change the PRD. Case planning at the Facility level is often done, "day to day". This is something that Central Office never fully grasps.	Please refer to the case planning section for an explanation of the PRD. Note that the PRD should change and be updated as the case changes and therefore the timelines will still apply.
2	Transition and Reentry	39-40	10-19; 1-10	These things (items 1-7) should be established at intake and orientation. Waiting for release planning to check into ADA, 504, victim issues, and other factors should be done at the beginning of a sentence, not toward the end.	These are done at intake aswell, this is merely a double check to ensure that the case is fully up-to-date.

3	Transition and Reentry	40	22	“Identify any risk reducing accommodations available to the offender in the community.” This should not be the job of facility staff. This is the providence of the field sites. Or, even better, how about making the re-entry coordinators do this. They are supposed to be the local experts in services. I know were Bennington is on a map, never been there. How am I going to accomplish this task?	This is meant to ensure that if the offender requires any risk reducing accomodations that these are in place prior to release. As part of the reentry planning case workers are expected to resonably assits and they can use reentry coordinators as a resource if they get stuck.
4	Transition and Reentry	41	Bottom of page	“Conduct the Developmental Services survey” What is this?	Please refer to page 48.
5	Transition and Reentry	42	Top of page	Determine whether or not the offender has designated MH needs. CSS staff are not trained nor licensed to do this.	CSS staff shall review reports and consult with MH staff.
6	Transition and Reentry	43	2	Identifying local services such as a Primary care provider, dental care and pharmacy locations etc. should be the task of local staff. Again, I know were Bennington is on a map...	CSS need to use available resources (reentry coordinators, 211, etc) to ensure that this is in place.
7	Transition and Reentry	43	2	No one in the department, to my knowledge, refers to Field CSS. They are Probation officers (PO). Please switch all references of “Field CSS” to “PO”. This will clear up any confusion about who is responsible	This is the classification therefore it is the job title.
8	Transition and Reentry	44-46		Writing summaries on the same need areas that are already done in other areas of OMS is wasteful. These summaries should be self-authored and only need to be done one time.	This is part of corrections best practice to ensure case plans are adequate.
9	Transition and Reentry	48	a-e	I have never heard of these waivers. These things, if they do exist, should be done closer to intake to establish special conditions that the inmate may have. It would be better to find this stuff out at the beginning of a sentence.	This is part of the reentry checklist and has been in practice for 2 years.
<i>Cullen Bullard</i>					
2	Transition and Reentry	40	1	this is also defined in statute	Thank you.
3	Transition and Reentry	40-44		The chart should be organized by when something needs to be done.	Changed.
<i>Stephen Russell</i>					

1	Transition and Reentry	39	12	should say, the facility and field CSS will make reasonable effort through co-case management, in conjunction with offender, to ensure he/she has housing at the PRD. This change is necessary because community CSS's because the field CSS has more direct knowledge of possible residence options than the facility.	This is the responsibility of the Facility CSS as the Department has moved away from joint responsibilities of case-co management. However, the Facility CSS shall utilize available resources (Field PO's, transitional housing, reentry coordinators) if there is a housing struggle.
2	Transition and Reentry	40	4-6	these types of evaluations are beyond the scope of most CSS staff and will require increased communication with the CHSVT. This type of communication does not exist at all sites. If education is already identifying and addressing these issues this would be a duplication of work. Furthermore, if they have access to this information, at the very least, provide us with that documentation, and/or recommendations.	This is the responsibility of the Facility CSS to use necessary efforts (this could be reading the file to see if other agencies have been involved). Additionally, Facility CSS shall utilize available resources (CHSVT, centurion etc).
3	Transition and Reentry	40	22	Again, the field CSS will need to coordinate with the facility CSS to ensure all accommodations are accessed as they will be privy to more accommodations in the community.	This is the responsibility of the Facility CSS as the Department has moved away from joint responsibilities of case-co management. However, the Facility CSS shall utilize available resources (Field PO's, transitional housing, reentry coordinators) if needed.
4	Transition and Reentry	41		Due to turnaround and last minutes release plan being a common occurrence the directive should state that Non employee ID's will be completed w/in 60 days of their release. In addition, the three squares application is only good for 30 days, therefore, it should read that the application be completed no more than 30 days prior to their release.	This was a conscious decision to ensure that all necessary services were in place.
5	Transition and Reentry	41		Facility CSS does not have the power to assure that housing is approved 30 days prior to release.	Changed.

	Transition and Reentry	42		Facility caseworkers are not going to have the resources available to choose a primary care providers for offenders who are to be released throughout the entire state. Transfer of health records should not be handled by CSS and should be handled by medical who are qualified healthcare professionals, not caseworkers. They are already providing these services and it is a duplication of services. In addition, it is recommended that we review the Centurion contract to determine whether this already exists under the current contract as it applies to continuity of care.	CSS need to use available resources (reentry coordinators, 211, etc) to ensure that this is in place. The request of medical records is per the Health Services procedures.
	Transition and Reentry	42		In regards to transportation 60 days is too early to look for transportation. Inmates support people are unable to confirm that far out. Release intake dates are seldom formalized at this time. In regards to graduated sanctions and short term furlough revocations it is recommended that the field CSS could assist the facility in identifying transportation. What happens if they don't have transportation? What requirement is placed on the field to help?	This is an identification of whether or not transportation is going to be an issue so that can be resolved prior to release.
	Transition and Reentry	46		(Pre-release report) This should be completed by VTPSA staff, not facility CSS.	This is per VTPSA procedure.
	Transition and Reentry	48		please add to OMS (Developmental Survey)	Have changed language.
<i>Shawn Baraw</i>					
1		48	Developmental Services Survey	This seems to be out of place. Should this be incorporated into the facility CSS responsibility chart that begins on page 40?	We are hyperlinking.
<i>Kelly Chamberlain</i>					
1		44	3	Same for the Re-Entry and Transition Plan; I realize this is an ongoing document that will be updated throughout the time the offender precedes and goes through re-entry, but is there a due date when the SMART Goals need to be done and everyone understand what the plan is for this offender?	The chart has individual timelines for components, in terms of ORAS it is 45 days out.
<i>Seth Page; Jill Anderson; Amber Charbonneau</i>					

1		43-44	<p>The responsibilities of the field CSS in the Reentry Case Plan. Many of the things that is required of the Field CSS are beyond our scope. Such as finding out if the offender owes child support, and other debt. In the third row it states "Consulting with the CSS on the Developmental Services survey with the offender." I am unsure as to what this survey is. In row four it says "Identifying the offender's transportation options when supervised in the community." I feel that this takes away accountability for the offender. It should be noted Probation officer do not have access to child support issues. This is also mentioned on Page 45 Line 20. Row 5 states that Residence approval shall be done "No less than 30 days prior to release." How is this possible when the residence investigation is required to be done within 30 days?</p>	<p>These are part of case management where the Field CSS should be talking to the offender about their individual circumstances - it is not expected that the Field CSS call the courts to find out about debt obligations but is expected that they ask the offender if they have any.</p>
2		44	<p>32 It is unnecessary for field CSS's to find out whether or not the offender has any debt owed in the community. Are we expected to run a credit report? If it's just a matter of asking about the debt that should be done by the facility CSS.</p>	<p>These are part of case management where the Field CSS should be talking to the offender about their individual circumstances - it is not expected that the Field CSS call the courts to find out about debt obligations but is expected that they ask the offender if they have any.</p>
<p><i>Breanne MacFarland</i></p>				

1		43+44	<p>The responsibilities of the field CSS in the Reentry Case Plan. Many of the things that is required of the Field CSS are beyond our scope. Such as finding out if the offender owes child support, and other debt. In the third row it states "Consulting with the CSS on the Developmental Services survey with the offender." I am unsure as to what this survey is. In row four it says "Identifying the offender's transportation options when supervised in the community." I feel that this takes away accountability for the offender. It is also confusing ... are you saying we need to find them transportation from jail to the community or once they are in the community transportation to different appointments/work/etc? It should be noted Probation officer do not have access to child support documents, nor are we involved with Family Court issues unless we have to be. This is also mentioned on Page 45 Line 20. Page 44 Line 32. It is unnecessary for field CSS's to find out whether or not the offender has any debt owed in the community. Are we expected to run a credit report? If it's just a matter of asking about the debt that should be done by the facility CSS.</p>	<p>These are part of case management where the Field CSS should be talking to the offender about their individual circumstances - it is not expected that the Field CSS call the courts to find out about debt obligations but is expected that they ask the offender if they have any.</p>
2		45	<p>I am not comfortable being giving an offender Narcan as I am not a medical professional. They can purchase it over the counter at Rite Aid if they feel they need it.</p>	<p>This is the law and the Department was expected to do this.</p>
3		45	<p>23-24 This should be the responsibility of the caseworker at the jail and the field staff should only have to follow up and ensure the offenders follow through.</p>	<p>This is the responsibility of the Facility CSS hence why it is not in green - please see page 40 line 20.</p>
<i>Jonathan Robinson</i>				

1		43+44	<p>The responsibilities of the field CSS in the Reentry Case Plan. Many of the things that is required of the Field CSS are beyond our scope. Such as finding out if the offender owes child support, and other debt. In the third row it states "Consulting with the CSS on the Developmental Services survey with the offender." I am unsure as to what this survey is. In row four it says "Identifying the offender's transportation options when supervised in the community." I feel that this takes away accountability for the offender. It is also confusing ... are you saying we need to find them transportation from jail to the community or once they are in the community transportation to different appointments/work/etc? It should be noted Probation officer do not have access to child support documents, nor are we involved with Family Court issues unless we have to be. This is also mentioned on Page 45 Line 20. Page 44 Line 32. It is unnecessary for field CSS's to find out whether or not the offender has any debt owed in the community. Are we expected to run a credit report? If it's just a matter of asking about the debt that should be done by the facility CSS.</p>	<p>These are part of case management where the Field CSS should be talking to the offender about their individual circumstances - it is not expected that the Field CSS call the courts to find out about debt obligations but is expected that they ask the offender if they have any.</p>
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3		45	23-24 <p>This should be the responsibility of the caseworker at the jail and the field staff should only have to follow up and ensure the offenders follow through.</p>	<p>This is the responsibility of the Facility CSS hence why it is not in green - please see page 40 line 20.</p>
4		49	37+38 <p>What is risk control and risk reduction strategies? It is mentioned many times in the document from here on out, but never defined.</p>	<p>Refer to the individual sections on risk control and risk reduction,</p>
<i>Ethan Bacon</i>				

1		43+44	<p>The responsibilities of the field CSS in the Reentry Case Plan. Many of the things that is required of the Field CSS are beyond our scope. Such as finding out if the offender owes child support, and other debt. In the third row it states "Consulting with the CSS on the Developmental Services survey with the offender." I am unsure as to what this survey is. In row four it says "Identifying the offender's transportation options when supervised in the community." I feel that this takes away accountability for the offender. It is also confusing ... are you saying we need to find them transportation from jail to the community or once they are in the community transportation to different appointments/work/etc? It should be noted Probation officer do not have access to child support documents, nor are we involved with Family Court issues unless we have to be. This is also mentioned on Page 45 Line 20. Page 44 Line 32. It is unnecessary for field CSS's to find out whether or not the offender has any debt owed in the community. Are we expected to run a credit report? If it's just a matter of asking about the debt that should be done by the facility CSS.</p>	<p>These are part of case management where the Field CSS should be talking to the offender about their individual circumstances - it is not expected that the Field CSS call the courts to find out about debt obligations but is expected that they ask the offender if they have any.</p>
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3		45	23-24 <p>This should be the responsibility of the caseworker at the jail and the field staff should only have to follow up and ensure the offenders follow through.</p>	<p>This is the responsibility of the Facility CSS hence why it is not in green - please see page 40 line 20.</p>
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<i>Amy Jacobs</i>				

1		43+44		The responsibilities of the field CSS in the Reentry Case Plan. Many of the things that is required of the Field CSS are beyond our scope. Such as finding out if the offender owes child support, and other debt. In the third row it states "Consulting with the CSS on the Developmental Services survey with the offender." I am unsure as to what this survey is. In row four it says "Identifying the offender's transportation options when supervised in the community." I feel that this takes away accountability for the offender. It should be noted Probation officer do not have access to child support issues. This is also mentioned on Page 45 Line 20. Row 5 states that Residence approval shall be done "No less than 30 days prior to release." How is this possible when the residence investigation is required to be done within 30 days?	These are part of case management where the Field CSS should be talking to the offender about their individual circumstances - it is not expected that the Field CSS call the courts to find out about debt obligations but is expected that they ask the offender if they have any.
<i>SPPP</i>					
1		39		Offender Type – who's identifying these types of offenders.	This is a heading for the two categories that follows.
2		39		#6 – not clear on what "eligible for other outside programs" means.	Examples include CRT, outside agency support, DS, etc. this will be further explained in training.
3		39		Line 10 – we feel something should be added around this being the beginning of co-care management. -CSS should be working hand-in-hand with PPO around appropriateness of residence. Footnote 8 – add in PPO (as they would both be involved)	We have eliminated case co-management and are now have direct responsibility with consultation between the CSS's.
4		40	13	we are thinking efforts should be tracked in case notes and specific places lived tracked in case plan.	Contact notes are only to be used for specific purposes, case plans should be more encompassing documents.
5		40	13-22	The transition and re-entry case plan (lines 13-22) It appears like you are using CSS interchangeably. Why not use PPO/CSS? Sometimes you say field, sometimes facility and sometimes it just says CSS.	Will provide clarification.
<i>Mary Jane Ainsworth</i>					
1		40	6	What section of the case plan should this be documented in?	Added in Family & Social Supports section

2		40		Column 3 Row 1 This is a little vague by just saying where. It appears that this is where it is documented.	Changed.
3		40		Column 1 Row 2 1st Bullet: Should is specifically state which ORAS? I know we are having trouble with staff filling out the wrong ones.	This is the correct title.
4		41		Column 1 Row 2 Italics: Is staff giving the offender a Non-Employee ID in all cases or only when the attempt was unsuccessful? If it's just when unsuccessful, it may make sense to replace the and with "if the attempt was unsuccessful...."	Changed.
5		41		Column 1 Row 3 Parentheses: Remove the word "for"	This is correct, they are separate applications.
6		41		Column 1 Row 6: Does the Developmental Services Survey need to go in OMS?	No have changed title.
<i>Michelle Pisegna</i>					
1		44	32	It is unnecessary for field CSS's to find out whether or not the offender has any debt owed in the community. Are we expected to run a credit report? If it's just a matter of asking about the debt that should be done by the facility CSS.	These are part of case management where the Field CSS should be talking to the offender about their individual circumstances - it is not expected that the Field CSS call the courts to find out about debt obligations but is expected that they ask the offender if they have any.

(Feel free to use additional space as needed)