

ELECTRONIC MONITORING				
Compiled Public Comments				
9/June/15				
COMMENT SHEET				
Comment #:	Page #:	Line #:	Comment:	Response:
<i>Tracy Kerr</i>				
1	4	1-6	Equipment can change daily. In/out changes on a regular basis. Equipment when set back to 3M is removed from inventory once RMP is issued, why keep tracking that it is gone? Why does it matter the date it came into the office? How long do you store this record?	This is needed to prove our invoices and to ensure adequate record checking.
2	4	25	They tell us when to send it back.	Correct, but if a problem is detected it would require it to be sent back as a proactive measure.
3	5	10-12	Say you have 30 on EM. That means case notes on 30 people each day. 1 note 5 min x 30 = 150 min last thing notes. Is this really a good use of time? <i>Gentry Gerber &amp; Ron Hiett</i>	Documentation requirements are only required for alerts, therefore contact notes would only be required if there was an alert.
1	3	19	180 days seems excessive. EM should not exceed 90 days unless approved by DM.	This has been changed.
2	3	21	After 30 days on EM should be documented in casenote.	This has been changed and clarified.
3	3	23	If offender is taken off of EM early, it should be in a casenote.	This has been changed and clarified.
4	5	1-6	Central in last sentence in paragraph should be core.	This has been changed.
5	General		Review of EM. We would like to see number 10 look similar to number 6 which leaves it up to the DM to designate a PO or CCO the responsibility to review EM everyday. It would be easier for the DM to supervise when there is fewer hands in the pot (EM Access). CCOs have full access and responsibility while the POs have read access only. This works well at Springfield Probation and Parole Office.	Changed to assigned staff person.
6	General		We have a concern regarding the amount of time it takes to review EM daily. As of right now, CCOs receive alerts on: No Connection, Strap and Battery Alerts. It seems if we address alerts as they come in that reviewing EM every other day than daily would seem sufficient and allow CCOs to be in the field.	This has been noted and addressed throughout the directive in a number of changes.
7	5	24-26	DM should be able to designate CCO or PO of their choosing just like #6 and #7.	This doesn't prevent an assigned staff member from reviewing, but decisionmaking is left to PO.
8	General		Really like the updated EM form <i>Sue Gladding &amp; Ron George</i>	Thank you.
1	1	10	Suggest "risk management" be deleted. There are occasions where offenders on response supervision may be monitored via electronics.	EM should not be used on response cases, if EM is necessary on a response case it should be overwritten to risk management.
2	2	6	In Transponder Description Box: Change to It measures alcohol vapors and transmits...	No this is the accurate definition.
3	2	6	GPS Description Box: Change to --supervising officer the offenders location, movement, and timeframes allowing staff to check compliance with condition of supervision.	No this is the accurate definition.
4	2	29	Suggest change to: Explain to the offender how equipment is installed and the offenders daily requirements of its care and use.	Leaving separate.
5	2	30	Delete as not needed with the change above.	Leaving separate.
6	3	3	EM files do not need copies of documents that are already kept in offenders core and OMS files.	This is a catchall while OMS is developing.
7	3	21	Delete as it is not needed. EM is utilized for specific time frames for HC, HD, graduated sanctions, and RF releases. A review is not necessary in those cases. The only other use of electronics is based on furlough supervision plans that are used to manage risk in the community. Those are case/supervision plan based and are subject to review through that process. EM review is not needed, labor intensive, and unlikely that DOC would be compliant. Not a good idea.	See changes.
8	3	46	Suggest changing to: Communicate equipment needs, problems, concerns, and trends to the statewide.	No this falls under needs and problems.
9	4	41	A process for requiring restoration and/or criminal charges need to be created and detailed here.	No this is not a policy need rather procedural.
10	4	46	Change assigned PO to assigned staff. HD may not be assigned to a PO.	Changed to assigned staff person.
11	5	14	Change assigned PO to DOC staff. In most cases CCO's EM person is the one checking not the PO.	Changed.
12	7	28	Concerned about the wording "when outside of your home". We understand that it covers the 2 piece units but may imply that electronic bracelets maybe removed while at home.	Understand concern but feel language is appropriate.
13	General		Thanks for the changes from the initial draft.	Your welcome.
<i>Maria Godlewski</i>				
1	3	4	states "At a minimum these files shall contain associated forms and supporting documentation, including but not limited to a copy of the graduated sanction." Not all offenders are placed on EM on a sanction; for some it is because of their status (HC), for some it is a condition of their release (case staffing) for some it is a tool that is permitted per 430.10 for level 4-5 offenders or a person with a condition where EM can be used to enhance supervision (arrest, no contact) without a sanction needing to be imposed.	Changed to not require inclusion
2	3	28	references case notes which are now contact notes	Changed
3	4	38	what do we do if an offender intentionally damages a unit or throws it away, can they be on EM again?	Yes, they would still have to abide by directive
4	5	34	I would suggest adding cutting off the unit which is different from a tamper	Included in tamper.
<i>Jeff Cobb</i>				
1	3	28	change case note to contact note	Changed
2	5	1	space between "offender" and "will"	Changed
3	General		I do agree with most of the language in the directive. I like how it makes the PO responsible for tracking the movement.	Thank you.
<i>Jeff Leggio</i>				
1	5	10-13	Section #10 (a) where it states that EM compliance shall be reviewed daily and documented in OMS. We have ALWAYS documented EM violations/unit tamper in the database but were recently told we had to document all monitoring even non-violations. This takes anywhere from 3-4 hours depending on how many people are on GPS and SCRAM. The actual monitoring is not that time consuming unless there are several violations you have to look into checking furloughs, case notes, or calling POs to see if the offender had authorization to go anywhere and it just didn't happen to be documented in case notes or on their furlough for some reason. If the movement was truly a violation, then you examine where the offender went for what duration of time and look to see if they have a victim or a no contact person listed and where the victim or no contact might currently reside. Entering case notes into the new OMS system is more time consuming than the two other systems we used to have and entering non-violations is VERY time consuming considering on average we have around 40 offenders on GPS and around 20 on SCRAM. I have learned that some offices have an EM officer who's only duty is electronics and EM. There does not and we've found documenting non-violations as well as the violations eats a LARGE portion of an 8 hour shift. With the need of more and more offenders being placed on electronics due to the department exploring avenues of keeping more offenders in the community and CCO positions NOT being filled when they become vacant, one would hope there could be some priority placed on what type of EM needs to be entered into the OMS system rather than thinking authorized GPS movement and non-consumption SCRAM electronic monitoring requires daily documentation.	This has been noted and addressed throughout the directive in a number of changes.
<i>Lucas Herwin</i>				
1	2	17-25	how are staff accessing database systems for auditing, regular checks and how are they ensure data entry compliance and proper usage? Is there a process to gain access to the system and who gives that access?	This will be handled using other technical guidance means.
2	4	5	Looking under Section 7 for what data the Equipment Coordinator shall track manually in an excel sheet, I have a couple of questions. • Related to section 10, are staff using the excel list to manually check information in the vendors system in order to understand what device matches with individual? Is there any DOC data being stored in the vendor system? If so, what public and nonpublic information? • Related to section 11, what type of information is sent in the sheet? Is this specific inmate information, or information about the device that the DOC PO would again need to check against the excel sheet?	This is a policy document not procedural- each site will be responsible for ensuring they meet the requirements of the directive.
<i>Doug Bickford</i>				
1	2	36	The correct word is "ensure", not "insure" (unless the policy is requiring the Department to purchase compensation policies from the vendor in case of the failure of "tamper functioning").	Changed
2	3	1-3	Misplaced comma. Should be "including, but not limited to, a copy..."	Changed
3	4	8	In reference to "locally maintained spreadsheets" - Will this require rewriting the Directive when/if the centralized database develops the functionality to track this equipment statewide?	Yes.
4	5	1-6	Missing space between words. Also, this paragraph is in a section about what must be done during an intake "before an offender can be placed in the EM program". As such only the first sentence is a pre-placement requirement. The rest of the paragraph is discussing the filing, purging, and transferring of post-placement forms - not a requirement to be met during the intake "before" placement. These issues seem more closely contained in paragraph #9 above ("EM cases shall be documented in the following manner:"). In terms of flow in reading the procedural steps, this paragraph would seem better placed as #4 (after eligibility requirement and before length of EM guidelines).	Thank you.
5	5	8-16	The term "OMS" is not defined in the Directive. Is it supposed to mean something different than the phrase "in case notes" used elsewhere in this document? I.e. is there a "not case note" place "in OMS" for "EM reviews" and the Directive is instructing the staff to use that different functionality and not to enter the EM reviews in case notes? As worded, this establishes an expectation that there will be an entry in the "EM Review section of OMS" every day for every individual on EM - is that correct?	Definitions are no longer in directives but terms will be on website.
<i>Benjamin Meras</i>				
1	General		Interesting that this directive makes no mention of the electronic monitoring done on inmates at a work camp. I understand there is probably another directive that specifically covers that, but I would think there should be a mention.	Withdrawn after clarification from Director of Facilities as to the use of EM within facilities.