



DISTRICT OF COLUMBIA DEPARTMENT OF CORRECTIONS

Program Statement

OPI: DIR
Number: 4030.1H
Date: January 6, 2012
Supersedes: 4030.1G (3/09/10)
Subject: Inmate Grievance
Procedures (IGP)

1. **PURPOSE AND SCOPE.** To update administrative procedures through which inmates of the District of Columbia Department of Corrections (DOC) may seek resolution of complaints.

2. **POLICY**
 - a. It is DOC policy to provide an administrative means for expression and resolution of inmate issues and complaints through informal resolution. Many matters can and should be resolved directly and promptly between the inmate and authorized institutional staff and resolution shall be the primary goal.
 - b. If informal resolution does not provide a successful solution for the complaint or in the event of an emergency grievance, inmates may use the formal grievance process.
 - c. The grievance process has at least one level for appeal.
 - d. All complaints and grievances shall be considered and resolved in a fair and impartial manner.
 - e. Grievances are considered legal correspondence. Staff shall not open or inspect a sealed envelope that is labeled "Grievance" and addressed to the Grievance Coordinator or the Director.
 - f. DOC employees, contractors, interns and volunteers shall not retaliate or allow one inmate to retaliate against another inmate for the good faith use of, or participation in, the inmate grievance process.

3. APPLICABILITY

- a. This Program Statement (PS) applies to any DOC facility and to contractors who house or provide services to inmates under the care and custody of the DOC.
- b. Inmates housed in contract facilities shall use the contractor's grievance process, noting the contractor to be responsible for day-to-day operations within the affected facility. Upon exhaustion of the contractor's grievance process, the inmate may send a written appeal to DOC officials as outlined in Section (20) of this directive.
- c. *Grievance Issues.* Inmates may request informal resolution and/or grieve the following matters through the grievance process.
 - 1) Matters relating to the conditions of safety, care and supervision;
 - 2) Matters relating to inmate programs, activities and services;
 - 3) Matters relating to inmate property;
 - 4) Matters relating to individual staff treatment and inmate actions;
 - 5) Matters relating to sentence computations, good time and jail credits, detainers, and late release;
 - 6) Denial of access to the informal resolution or IGP processes;
 - 7) Reprisals against inmates for utilizing the IGP process;
 - 8) Matters pertaining to inmate treatment and legal rights established by federal and local law and regulations; and
 - 9) The application of DOC rules, policies and/or procedures except those listed in § d ¶1 below (those matters have established appeal procedures).
- d. *Non-Grievable Issues.* In accordance with this directive the following issues cannot be grieved under this process.
 - 1) Institutional or Court Ordered Work Release decisions, decisions of the Adjustment or Housing Boards, Classification Committee decisions and requests under the Freedom of Information Act and HIPAA *can not be grieved under this procedures but can be appealed through the Warden in accordance with related policy;*

- 2) Inmate class action grievances or petitions;
- 3) Final decisions on grievances;
- 4) Inmate Accident Claims, Tort Claims;
- 5) Complaints filed on behalf of other inmates;
- 6) Federal and local court decisions, laws and regulations; and
- 7) Policies, procedures, decisions or matters to include but not be limited to transfers, sentence computations, and parole/probation/release treatment decisions issued by the Bureau of Prison, Immigration and Customs Enforcement (ICE) or other states and jurisdictions.

4. NOTICE OF NON-DISCRIMINATION

- a. In accordance with the D.C. Human Rights Act of 1977, as amended, D.C. Official Code §2-1401.01 et seq., (Act) the District of Columbia does not discriminate on the basis of race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, familial status, family responsibilities, matriculation, political affiliation, genetic information, disability, source of income, status as a victim of an intrafamily offense, or place of residence or business. Sexual harassment is a form of sex discrimination that is also prohibited by the Act. Discrimination in violation of the Act will not be tolerated. Violators will be subject to disciplinary action.

5. PROGRAM OBJECTIVES. The expected results of this program are:

- a. Open lines of communication will identify, prevent or resolve matters and reduce the need for complaints and grievances.
- b. Inmate grievances will be resolved through formal procedures when informal means have failed.
- c. Written responses based upon full investigation and resolution when appropriate, including the reasons for the decision, shall be given to all inmate complaints and grievances within the prescribed time limits.
- d. Inmates will use this procedure and pursue claims in court only if dissatisfied with resolutions obtained from the IGP.

6. **DIRECTIVES AFFECTED**

a. **Directive Rescinded**

PS 4030.1G Inmate Grievance Procedure (IGP), (03/09/10)

b. **Directives Referenced**

- a. PS 1300.1 Freedom of Information Act (FOIA)
- b. PS 2000.2 Retention and Disposal of Department Records
- c. PS 4020.1 Inmate Orientation Program
- d. PS 4070.1 Inmate Telephone Access

7. **AUTHORITY**

- a. DC Code § 24-211.02 Powers; Promulgation of Rules
- b. Prison Litigation Reform Act (PLRA), 42 U.S.C. § 1997e.
- c. D.C. Code § 2-531, et seq., D.C. Freedom of Information Act

8. **STANDARDS REFERENCED.** American Correctional Association (ACA) 4th Edition Standards for Adult Local Detention Facilities 4-ALDF-2A-05, 4-ALDF-2A-27, 4-ALDF-6B-01, 4-ALDF-4C-01, 4-ALDF-4D-22-07 and 4-ALDF-6A-07.

9. **RESPONSIBILITIES**

- a. Wardens shall ensure that an appropriate investigation is conducted and an adequate response is prepared for each grievance in accordance with the procedures set forth in this directive.
- b. The Deputy Director shall ensure that an appropriate investigation is conducted and an adequate response is prepared for each appeal to a grievance in accordance with the procedures set forth in this directive.
- c. Each facility shall maintain a sufficient supply of Inmate Request Slips and Inmate Complaint – Informal Resolution forms.
- d. Each facility shall maintain a sufficient supply of IGP forms for formal resolution and submission of appeals.

- e. Each facility shall maintain a sufficient supply of the other institutions IGP forms for formal resolution and submission of appeals.
- f. Each Housing Unit and Community Correctional Center (CCC) supervisor shall ensure that sufficient forms are available and accessible on the unit during his or her tour of duty.
- g. The inmate grievance procedures shall be available to inmates regardless of any disciplinary, classification, or other administrative or legal conditions affecting them.

10. **INMATE NOTIFICATION**

- a. The Warden or the Office of Community Corrections (OCC) Administrator shall ensure that this Program Statement (PS) and any other written directives pertaining to the Inmate Grievance Procedure (IGP) are readily available to all inmates/offenders.
- b. The inmate grievance procedure is outlined in *PS 4020.1, Inmate Orientation*, and further notification of the procedures shall also be given to each inmate during intake orientation.
- c. This PS shall be readily available in the law library, case manager offices, posted on inmate bulletin boards, and as appropriate, shall be described in inmate handbooks.
- d. The Warden shall ensure that non-English speaking inmates, inmates who cannot read or are otherwise impaired (physically or mentally), receive assistance in order to understand and access the inmate grievance procedures.

11. **STAFF NOTIFICATION/TRAINING**

- a. The Deputy Director shall ensure that this PS and any other written directives pertaining to the IGP are made available to all staff assigned to DOC and DOC contract facilities.
- b. The Department's Training Academy shall include a discussion of the IGP PS as part of its Pre-Service, Basic Correctional Training (BCT) and In-Service training curriculum for employees.
- c. Staff members shall have an opportunity to ask questions regarding the IGP and will be given an opportunity to have these questions answered orally.

- d. The Training Administrator shall maintain the signed acknowledgements indicating that staff members have reviewed a copy of the IGP Program Statement.

12. **SUPERVISION AND MANAGEMENT**

- a. The Warden, Deputy Wardens and designated program managers shall visit housing units and inmate activity areas at least weekly to encourage informal contact with staff and inmates and to informally observe living and working conditions.
- b. Chief Case Managers, Case Managers, Correctional Supervisors and Housing Unit Officers shall make every attempt to keep the channels of communication open between staff and inmates and shall informally resolve issues expeditiously whenever possible.
- c. When managers determine that the results of an inmate grievance point to systemic deficiencies, appropriate action shall be taken. This action may include recommendations for procedural changes to correct systemic problems, refresher training, or counseling or discipline when an investigation finds this to be the appropriate action.

13. **INVESTIGATING GRIEVANCES.** Managers shall investigate and respond to grievances. Persons implicated or involved in a grievance are prohibited from investigating that grievance.

14. **CONFIDENTIALITY.** Records concerning an individual's participation in the IGP are considered confidential. These records shall be made available in accordance with the established procedures for confidential records and information, as contained in the D. C. Freedom of Information Act and agency *PS 1300.1, Freedom of Information Act (FOIA)*.

15. **INMATE GRIEVANCE ADVISORY COMMITTEE (IGAC).** The CDF shall establish and maintain an IGAC, composed of five (5) inmates, the IGP Coordinator, one program manager and one uniformed supervisor. The IGAC shall meet monthly and has the following responsibilities:

- a. Discussing general inmate concerns and grievance matters as defined in this directive;
- b. Providing recommendations and comments to the Warden/Office of Community Corrections (OCC) Administrator regarding the operation, effectiveness, and credibility of the IGP process;

- c. Providing recommendations to the Deputy Director and the OCC Administrator for improved activities and conditions;
- d. Reviewing the IGP Program Statement during annual reviews, and
- e. Preparing and forwarding minutes of IGAC meetings to the Warden for review and other appropriate action.

16. INMATE GRIEVANCE PROCEDURE (IGP) COORDINATOR

- a. The Warden shall appoint an IGP Coordinator who shall:
 - 1) Coordinate activities and operations associated with informal complaint resolution and IGP retrieval, distribution, tracking, database entry, monitoring and establishment of resolution suspense dates (the dates given by the IGP Coordinator to the Office Chiefs for response).
 - 2) The IGP Coordinator or designee shall collect informal complaints and grievances from each housing unit IGP mailbox on a daily basis (excluding Saturdays, Sundays and legal holidays).
 - 3) Ensure informal resolution has been attempted (excluding emergency grievances).
 - 4) Assign and forward informal and formal grievances to the appropriate program manager for response/resolution.
 - 5) Maintain the JACCS electronic data input and tracking.
 - 6) Apprise the affected Warden on the next business day when suspense dates are not met.
 - 7) Ensure the inmate receives a copy of the completed informal response or grievance.
 - 8) If the inmate is transferred to the Central Treatment Facility (CTF) the IGP Coordinator shall forward the CDF response to the IGP Coordinator at the CTF.
 - 9) The IGP Coordinator where the inmate is located shall ensure that the response to the grievance is forwarded to the inmate and a copy is placed in the inmate's official institutional record.

- 10) Not less than quarterly, conduct a random sample of grievance decisions and document whether the assigned manager took appropriate action by the imposed deadline.
 - 11) Bring matters of concern or potential problems to the Warden's and/or other appropriate manager's attention.
- b. The Director and Deputy Director shall assign staff to perform the above stated duties at the respective appeal levels.

17. INMATE REQUEST SYSTEM

- a. *Request Slip.* Inmates shall continue to use the DOC Inmate Request Slip (Attachment E) system when seeking routine assistance.
- b. *Sick Call.* Inmates shall request non-emergency medical care by using the ITS system on the housing units in accordance with *PS 4070.1, Inmate Telephone Access* or by completing a manual sick call slip.
 - 1) In the event of a lockdown, the Warden's office shall notify medical. Medical staff shall ensure that manual sick call slips are available on all affected units and are collected and triaged daily until the lockdown is over.
- c. *Environmental Safety and Sanitation Inspections.* During cell inspections on the #2 Shift and #3 Shift, inmates shall demonstrate that cell plumbing works and shall report broken fixtures and repair. Inmates shall inform correctional staff at any time when more urgent breakdowns such as clogged plumbing occur.

18. INFORMAL COMPLAINT PROCESS

- a. With the exception of emergency grievances, inmates/residents are required to utilize the informal resolution process concerning disputes, or complaints that were not reasonably addressed after submission of a request slip.
- b. Informal Complaint Submission
 - 1) Inmates shall be able to request informal resolution seven (7) calendar days after submitting a request slip that has not been answered by a staff member who is authorized to respond.
 - 2) Inmates may request the Inmate Complaint – Informal Resolution Form(Attachment A) from any staff member who is assigned to his or

her housing unit and the staff member shall give the inmate the form during his or her shift or tour of duty.

- 3) The inmate shall place the complaint in the grievance box that is located in the housing unit.
 - 4) The IGP Coordinator or designee shall collect inmate complaints from each CDF housing unit locked grievance box daily, Monday through Friday.
 - 5) The IGP Coordinator shall generate an inmate receipt using the Crystal Reports *Informal Resolution Request Receipt*.
 - 6) The IGP Coordinator shall forward the inmate receipt to the inmate via institutional mail.
 - 7) The IGP Coordinator shall assign the complaint to the appropriate program manager or staff member and establish a response due date.
 - 8) The IGP Coordinator shall log the complaint and make appropriate entries into an informal complaint tracking system.
 - 9) Unless an extension is granted due to extenuating circumstances, the inmate shall receive a response within fifteen (15) calendar days of submission.
- c. Informal Resolution Meeting. The staff member assigned to complete the informal resolution process shall:
- 1) Conduct an initial meeting with the inmate to discuss the issue;
 - 2) Meet with all staff members involved with the issue when needed;
 - 3) Research necessary information to determine if a remedy is possible;
 - 4) Develop a response to present to the inmate in an attempt to resolve the issue informally;
 - 5) Ensure the inmate and the IGP Coordinator receive a copy of the completed informal grievance form at the time the response is provided;
 - 6) Obtain the inmate's signature upon resolution of the complaint, and
 - 7) Ensure any remedies agreed upon are completed.

19. INMATE GRIEVANCE PROCESS

- a. An inmate may file a formal grievance when:
 - 1) The inmate is not satisfied with the results of the informal resolution process, in which case the inmate shall file the formal grievance within five (5) calendar days of receipt of the informal resolution response, or
 - 2) The inmate has not received a response within fifteen (15) calendar days of filing the complaint.
- b. Each grievance must pertain to one specific incident, charge or complaint.
- c. Inmates/offenders shall not submit duplicate copies of the same grievance.
- d. Inmates may request IGP Form 1 *Grievance* (Attachment B) from any staff member who is assigned to his or her housing unit and the staff member shall ensure that inmates who request an IGP Form are provided a form during his or her shift or tour of duty.
- e. Inmates may also obtain grievance and appeal forms during visits to the law library.
- f. If an IGP Form 1 *Grievance* cannot be obtained, an inmate may submit his or her grievance on standard, letter-sized paper. This grievance should contain the following information:
 - 1) The name and DCDC number of the inmate filing the grievance;
 - 2) The name of the institution or community correctional center where the inmate is housed;
 - 3) The nature of the complaint or grievance, date of occurrence, and the remedy sought;
 - 4) The inmate's signature; and
 - 5) The date.

20. PROCEDURES FOR FILING AN INMATE GRIEVANCE

- a. The inmate shall place the IGP Form 1 *Grievance* in the locked grievance box marked "GRIEVANCES." IGP collection boxes are located in each housing unit.

- b. Inmates housed in segregation units shall deposit the grievance form in the locked box marked "GRIEVANCES" during their individual recreation time or may also submit the grievance to their assigned case manager or a supervisor, having first placed the grievance form in a sealed envelope. The case manager or supervisor shall then place the grievance form in the locked box marked "GRIEVANCES".
- c. The Grievance Coordinator shall log all grievances into the JACCS system and forward the grievance to the appropriate manager for a response.
- d. The manager responsible for responding to the grievance shall ensure that the Grievance Coordinator receives the original grievance with the response and any corresponding documentation to ensure that the grievance is appropriately logged.
- e. The response to the grievance shall afford the inmate the opportunity for a meaningful remedy which shall cover a broad range of effective but reasonable solutions.
- f. Unless an extension is granted due to extenuating circumstances, the inmate shall receive a response within fifteen (15) calendar days of submission.

21. PROCEDURES FOR FILING AN EMERGENCY GRIEVANCE

- a. Emergency grievances shall be defined as matters in which an inmate would be subjected to substantial risk of personal injury or serious and irreparable harm if the inmate filed the grievance in the routine manner with the normally allowed response time.
- b. The inmate must prominently label and identify the grievance as an "Emergency Grievance" at the top of the IGP Form 1 *Grievance* and state the nature of the emergency.
- c. The inmate shall file the emergency grievance in a sealed envelope and shall mark the envelope as an emergency grievance. The inmate shall address his or her emergency grievance to the lowest administrative level at which an appropriate remedy can be achieved (i.e., OCC Administrator, Warden, or Director).
- d. If it is necessary for an inmate to file an emergency grievance on the weekend or a holiday the sealed envelope shall be given to the Shift Supervisor. The Shift Supervisor will ensure that the Duty Administrative Officer is notified upon receipt of the emergency grievance.

- e. If an inmate's/offender's grievance is of a sensitive nature and he/she has reason to believe that he/she would be adversely affected if it was to become known at the institutional level, he/she may file the grievance directly with the Director. All such emergency grievances may be placed in the locked grievance box or forwarded via regular institutional mail.
- f. The IGP Coordinator shall immediately review and consult with the Warden, or Administration/OCC Administrator to determine if the complaint is of an emergency nature as defined in this directive.
- g. The inmate shall be informed if the grievance is not accepted as an emergency grievance and informed that the grievance shall be treated as a regular grievance.
- h. The following special provisions shall apply to emergency grievances:
 - 1) An emergency grievance shall be responded to within seventy-two (72) hours of its receipt.
 - 2) Within forty-eight (48) hours of receiving a response to the emergency grievance, an inmate may appeal to the next level of the IGP appeal process.

22. **EXCESSIVE FILING OF GRIEVANCES.** If it is documented by the Warden/Administrator that an inmate is deliberately abusing the grievance system through excessive filing of grievances and/or repeated refusal to follow procedures, the Warden/Administrator will notify the inmate, in writing, that additional grievances will not be considered until all pending grievances have been resolved.

23. **FILING AN APPEAL**

- a. Central Detention Facility
 - 1) If an inmate is not satisfied with the CDF Warden's response to a grievance, he or she may file an appeal to the Deputy Director.
 - 2) This appeal shall be filed within five (5) calendar days of receipt of the grievance response from the Warden, using IGP Form 2 Appeal Level 1 – Deputy Director (Attachment C). The appeal shall be accompanied by a copy of the original grievance and the Warden's response and supporting documentation. If an IGP Form 2 *Appeal Level 1 – Deputy Director* cannot be obtained, an inmate may submit the grievance on standard letter-size paper.

- 3) The Deputy Director shall respond to an appeal within twenty-one (21) calendar days following its receipt.
- b. Corrections Corporation of America Correctional Treatment Facility
- 1) Inmates housed in the CTF shall exhaust all provided remedies in the affected facility to include formal and informal resolution efforts.
 - 2) The CCA Warden shall ensure that sufficient grievance and appeal forms are available on the housing units at the CTF.
 - 3) If the inmate is not satisfied with his or her response from the CTF Warden he or she may file an appeal to the Deputy Director or designee within five (5) calendar days, using IGP Form 2 *Appeal Level 1 – Deputy Director* (Attachment C) or plain letter-size paper. The inmate must attach copies of the informal complaint/resolution and response, and any supportive documentation from the CCA/CTF Warden.
 - 4) The Deputy Director or designee shall investigate and respond to the appeal within twenty-one (21) calendar days following its receipt.
 - 5) The Deputy Director or designee shall input required data into JACCS *Appeal Log*.
- c. Contract Community Correctional Center
- 1) If an inmate/offender housed in a contract community correctional center is not satisfied with his or her response from the contract CCC Administrator he or she may file an appeal to the Deputy Director within five (5) calendar days, using IGP Form 2 *Appeal Level 1 – Deputy Director* (Attachment C). If an IGP Form 2 *Appeal Level 1 – Deputy Director* cannot be obtained, an inmate may submit the grievance on standard letter-size paper. This appeal must be accompanied by copies of the original grievance and responses, and appropriate supporting documentation from the OCC Administrator.
 - 2) The Deputy Director or designee shall respond to the appeal within twenty-one (21) calendar days of receipt.
 - 3) The Deputy Director or designee shall input required data into JACCS *Appeal Log*.

- d. Final Appeal to the DOC Director
 - 1) As a final appeal an inmate/offender housed at the CDF, CTF or a contracted facility who is dissatisfied with an appeal decision rendered by the Deputy Director may submit his or her grievance to the Director within five (5) calendar days following the receipt of a grievance appeal response.
 - 2) The IGP Form 3 *Appeal Level 2 – Director (Attachment D)* shall be used for filing an appeal to the Director.
 - 3) Appeals to the Director must be accompanied by the original grievance along with the corresponding responses. If an IGP Form 3 *Appeal Level 2 – Director* cannot be obtained, an inmate may submit the grievance on standard letter-size paper.
 - 4) The Director shall respond to an inmate's/offender's appeal within twenty-one (21) calendar days of receipt of the appeal.
 - 5) The Director shall be the final level of appeal for each inmate/offender who files a grievance consistent with the DOC Inmate Grievance Procedure.
 - 6) The Director's designee shall input required data into JACCS Appeal Log.

24. DOC PROCEDURES FOR PROCESSING A GRIEVANCE

- a. IGP Coordinator
 - 1) The IGP Coordinator or designee shall collect inmate grievances from each CDF housing unit grievance box daily, Monday through Friday.
 - 2) The IGP Coordinator shall inform the inmate in writing:
 - a) When a non-emergency grievance will receive informal resolution because the inmate failed to follow this step of the process;
 - b) When the matter cannot be grieved under the IGP and/or should be otherwise appropriately addressed.
 - 3) The IGP Coordinator shall generate an inmate receipt using the Crystal Reports Informal Resolution Request Receipt or *GP Grievance Receipt*.

- 4) The IGP Coordinator shall forward the inmate receipt via institutional mail.
 - 5) The IGP Coordinator shall input required complaint data into the respective JACCS *Informal Resolution Request* or *Grievance Data Entry Screens* to include:
 - a) Grievance Entry Information - The IGP Coordinator shall enter the *JACCS Grievance Type Code* to indicate the subject of each complaint in order to permit efficient reporting, tracking and monitoring of informal resolution requests and grievances.
 - b) Review of Information
 - c) Whether the complaint was referred for Investigation
 - d) Whether an extension of time to respond was requested and the new date that a response is due if the inmate consents
 - e) Final Appeal Ruling (when applicable)
 - 6) The IGP Coordinator shall scan the original complaint/grievance into PaperClip.
 - 7) The IGP Coordinator shall then forward the complaint/grievance to the appropriate manager for investigation and resolution.
 - 8) The IGP Coordinator will monitor response due dates for grievances filed at the CDF using the Crystal Reports *IGP Grievances Due Next 7 Days* and *IGP Overdue Grievances features*.
 - 9) The IGP Coordinator shall communicate with the CTF IGP Coordinator to ensure that CDF Informal Complaint Forms are available to inmates housed at the CTF to ensure the appropriate staff member has respond to each inmate grievances.
 - 10) The IGP Coordinator will make notification to the appropriate managers identified in step 9.
- b. Investigation. The manager shall impartially investigate each grievance and make every effort to reach a reasonable resolution.
- c. Response to Grievances
- 1) The manager shall provide a written memorandum of response to the IGP Coordinator within ten (10) calendar days following receipt of the grievance.

- 2) The Warden shall review and approve/disapprove or otherwise revise the response.
- 3) The IGP Coordinator shall forward written notice of the findings and the decision to the inmate.
- 4) In any instance when the IGP Coordinator, in consultation with the Warden and the investigating manager, determines that a sufficient response to a grievance cannot be rendered within the prescribed time limitation, the following shall occur:
 - a) The affected inmate must be notified in writing of the need for the extension and of the specific length of the extension.
 - b) The inmate must agree in writing to the extension.
 - c) Otherwise, when a grievance does not receive a response within the prescribed response time, as established in this PS, the inmate may proceed to the next step in the grievance procedure.

25. TRANSFERS/RELEASES

- a. If a grievance is submitted for response and the inmate is transferred or released from DOC custody, resolution of the grievance will continue. It will be the responsibility of the inmate to inform the IGP Coordinator of the pending release or transfer and to provide a forwarding address for the response to be sent to. The IGP Coordinator will make every effort to forward the IGP response to a transferred or released inmate.
- b. If an inmate wishes to file a grievance against CTF after transfer to CDF, he/she can do so by following the CDF grievance process posted in all housing units. The inmate can request, from the CDF IGP Coordinator, a copy of the CTF Informal Complaint Form and submit the completed form to the CDF IGP Coordinator to be processed into JACCS and sent to the CTF IGP Coordinator utilizing the timeline of fifteen (15) days.
- c. CDF Informal Complaint Forms will be made available to inmates housed in CTF. The inmate can request from the CTF IGP Coordinator a copy of the CDF Informal Resolution Form and submit the completed form to the CTF IGP Coordinator to be processed into JACCS and sent to the CDF IGP Coordinator utilizing the timeline of fifteen (15) calendar days.

26. REPORTING

- a. The IGP Coordinator shall print the *Crystal Report IGP Complaint Log* that records all formal grievances entered in JACCS under the IGP. Not later

than the 10th day of each month, a copy of this log, reflecting grievances filed during the previous month, shall be forwarded through the Deputy Director to the Director.

- b. Each DOC official who renders a decision on an Inmate Grievance Appeal shall enter required data in the JACCS IGP screen.
- c. The IGP Coordinator shall print the *Crystal Report Unresolved Grievance Log* that tracks and monitors the progress of grievances remaining unresolved more than twenty-two (22) days after receipt. Not later than the tenth 10th day of each month, the Warden shall forward a copy of this log along with a Plan of Action for completion through the Deputy Director to the Director.
- d. All records, logs, and reports that pertain to inmate informal resolution and grievances shall be maintained in accordance with *PS 2000.2, Retention and Disposal of Department Records*.
- e. The Director shall provide to the Council on a quarterly basis internal reports relating to living conditions in the Central Detention Facility, including inmate informal and formal grievances and a copy of the *Unresolved Grievance Logs*.

27. IGP EVALUATION

- a. The IGP Coordinator shall submit monthly reports to the Warden that shall include, but not be limited to, IGP processing or procedural issues, emergent and systemic deficiencies, and general complaints and concerns that warrant attention.
- b. The Risk Manager shall review IGP reports and conduct quarterly audits, and, in conjunction with the Warden, determine plans of action where warranted to improve safety and program performance.
- c. At a minimum, the reviews described above, shall include assessments of the following operational factors:
 - 1) Compliance with Response Time – An assessment to determine if inmate grievances are responded to within the prescribed time periods.
 - 2) Availability of Forms – A determination of the accessibility and availability of the forms used to submit grievances.

- 3) Response to Grievances – An analysis to determine if appropriate responses and remedies are being provided in response to grievances.
 - 4) Credibility of the System – An assessment of inmate knowledge of, satisfaction with, and confidence in the IGP.
 - 5) Conclusions and Recommendations – An evaluation of the data generated through the IGP process (i.e., number of grievances, types of grievances filed, number and types of grievances by institutions). This data shall be used to develop specific conclusions and recommendations regarding Department operations and the DOC IGP.
- d. Annual Statistical Summary Report. The Office of Management Information and Technology Services shall maintain the database and provide an annual statistical summary of the DOC IGP and submit it to the Director and the Office of Internal Controls, Compliance and Accreditation. This summary shall be provided by the 21st day of October for the preceding fiscal year.



Thomas Faust
Acting Director

ATTACHMENTS

- A. Inmate Complaint – Informal Resolution
- B. IGP Form 1 *Grievance* (Administrative Remedy to Warden/OCC Administrator)
- C. IGP Form 2 (Appeal to Deputy Director)
- D. IGP Form 3 (Appeal to Director)
- E. Inmate Request Slip