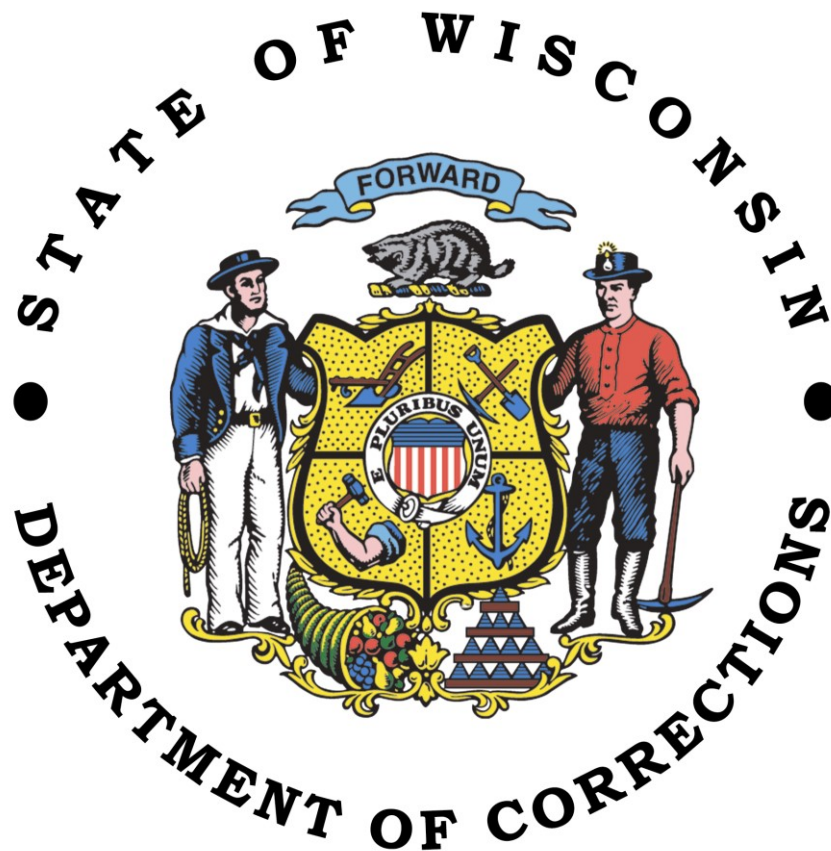


DAI ORIENTATION MANUAL FOR NON-DOC PERSONNEL, BUSINESS & PROFESSIONAL VISITORS



WISCONSIN
DEPARTMENT OF CORRECTIONS

POC-0079 (Rev. 8/2024)

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Manual is available on the DOC website: <https://doc.wi.gov/Pages/Home.aspx>
Search for "Volunteer"

INTRODUCTION

Welcome to the Wisconsin Department of Corrections!

Thank you for your willingness to work with persons in custody within Wisconsin correctional facilities. We highly value the important contribution you make in helping us fulfill our commitment to assist persons in our care (hereafter PIOC) in their reentry to society.

We realize that your time is valuable and appreciate your participation in this orientation program. This training has been specifically designed to assist you in becoming familiar with the correctional environment. For efficiency within this manual, all Non-DOC Personnel, Business and Professional Visitors with facility entry privileges will be identified as “Non-DOC Personnel” regardless of your particular role.

ORIENTATION MANUAL OBJECTIVES & DESIGN

This training and manual are intended to provide you with the knowledge and tools needed to safely and effectively carry out your function within Division of Adult Institutions (DAI) facilities. NOTE: The Division of Juvenile Corrections (DJC) has distinct policies and expectations applicable to working with youth in correctional facilities.

You will see a number of Wisconsin State Statutes, Administrative Code provisions, and Departmental policies referenced throughout this manual. State Statutes are laws established through the legislature and signed by the Governor. Administrative Codes are developed by state agencies detailing how State Statutes will be implemented – and must also be approved by the legislature. Executive Directives are issued by the DOC Secretary’s Office.

DAI Policies are issued by the Division of Adult Institutions; each facility may develop site-specific procedures to ensure their compliance with law and policy. Each facility is unique and you will be expected to be familiar with the pertinent procedures for each facility you are approved to enter. This manual will provide an overview sufficient for all DAI facilities; each facility will also provide their site-specific orientation, rules, entrance procedures and other necessary information.

The DOC houses over 22,000 PIOC in 36 DAI facilities. While some rules may seem excessive, please keep in mind that assaults (to both staff and other PIOC) are a common occurrence in many correctional facilities throughout the United States. .

Non-confidential DAI policies are posted on the DOC website at:

<https://doc.wi.gov/Pages/AboutDOC/DepartmentPolicies/DAIPolicies.aspx>.

Copies of other policies summarized during orientation can be provided upon request. Addendums include additional useful information and are referenced throughout. For example, Addendum #1 is a list of commonly used acronyms visitors may find helpful.

OVERVIEW OF THE DEPARTMENT OF CORRECTIONS

The *DOC* administers Wisconsin's correctional facilities, as well as offender supervision functions within the Division of Community Corrections (DCC) and the Division of Juvenile Corrections (DJC). The agency supervises the custody and discipline of PIOC in order to protect the public and seeks to rehabilitate offenders and reintegrate them into society. The governor appoints the DOC Secretary, who then appoints the division administrators.

The Division of Adult Institutions (DAI) supervises adult PIOC in a variety of correctional settings. DAI currently operates 19 correctional institutions and 17 community correctional centers or work-release sites. Security classification for each PIOC is assessed based on their criminal background and sentence structure, any history of assaultive behaviors, criminogenic needs, treatment participation, and conduct while incarcerated. This determines potential risk to the public, correctional staff, and other PIOC according to statistical research and evidence-based practices.

Security classifications include maximum, medium, minimum and minimum-community custody. These levels determine how closely PIOC are monitored and the programs in which they may participate. Although correctional facilities are classified by the highest level of security for which the facility is built and administered, an individual facility may house PIOC classified in several security levels.

Programming is designed to offer offenders opportunities to develop the knowledge and skills necessary to lead law-abiding lives upon release. Offenders are screened upon intake to determine their risk (security classification) and their programming needs, and to recommend facility placement.

Programs include academic and vocational education, cognitive-based training, substance use disorders treatment, other clinical treatment (including anger management, domestic violence, sex offender), institution work assignments, community work release employment, and religious observances. Job training is offered in a variety of settings; some facilities house Badger State Industries (BSI), which produces furniture, textiles, and linens, license plates, and signs and other services such as printing, computer recycling and wheelchair refurbishing.

Changing criminal laws prompted the need for increased capacity. Between 1986 and 1995, the total incarcerated population grew from about 6,000 to more than 15,000. DOC currently has over 22,000 PIOC and supervises over 63,000 offenders in the community.

The Parole Commission is a separate agency, appointed by the Governor, which evaluates PIOC sentenced prior to the truth-in-sentencing law (1999) for possible release to the community.

DOC MISSION, VISION & CORE VALUES

Mission

Protect the public, our staff and those in our charge.
Provide opportunities for positive change and success.
Promote, inform and educate others about our programs and successes.
Partner and collaborate with community service providers and other criminal justice entities.

Vision

To achieve excellence in correctional practices while fostering safety for victims and communities.
Every person - Every Family - Every Community Matters.

Core Values

We are accountable to each other and the citizens of Wisconsin.

- We manage our resources in an efficient, effective, sustainable, and innovative manner.
- We demonstrate competence and proficiency in the work necessary to accomplish our mission.
- We take individual responsibility for how we plan, perform, and manage our work.

We do what's right - legally and morally - as demonstrated by our actions.

- We value courage, candor, and conviction of purpose.
- We expect ethical behavior and integrity in all we do.
- We require honesty, adherence to the law, and the fair and equitable treatment of others.

We recognize employees as the department's most important resource.

- We work towards building a workforce of diverse individuals who achieve great things together.
- We recognize exemplary performance.
- We advocate in the best interest of our workforce.

We value safety – for our employees, the people in our charge and the citizens we serve.

- We provide the resources and training necessary for employees to safely accomplish our mission.
- We operate safe and secure facilities.
- We offer opportunities for offenders to become productive members of their communities.

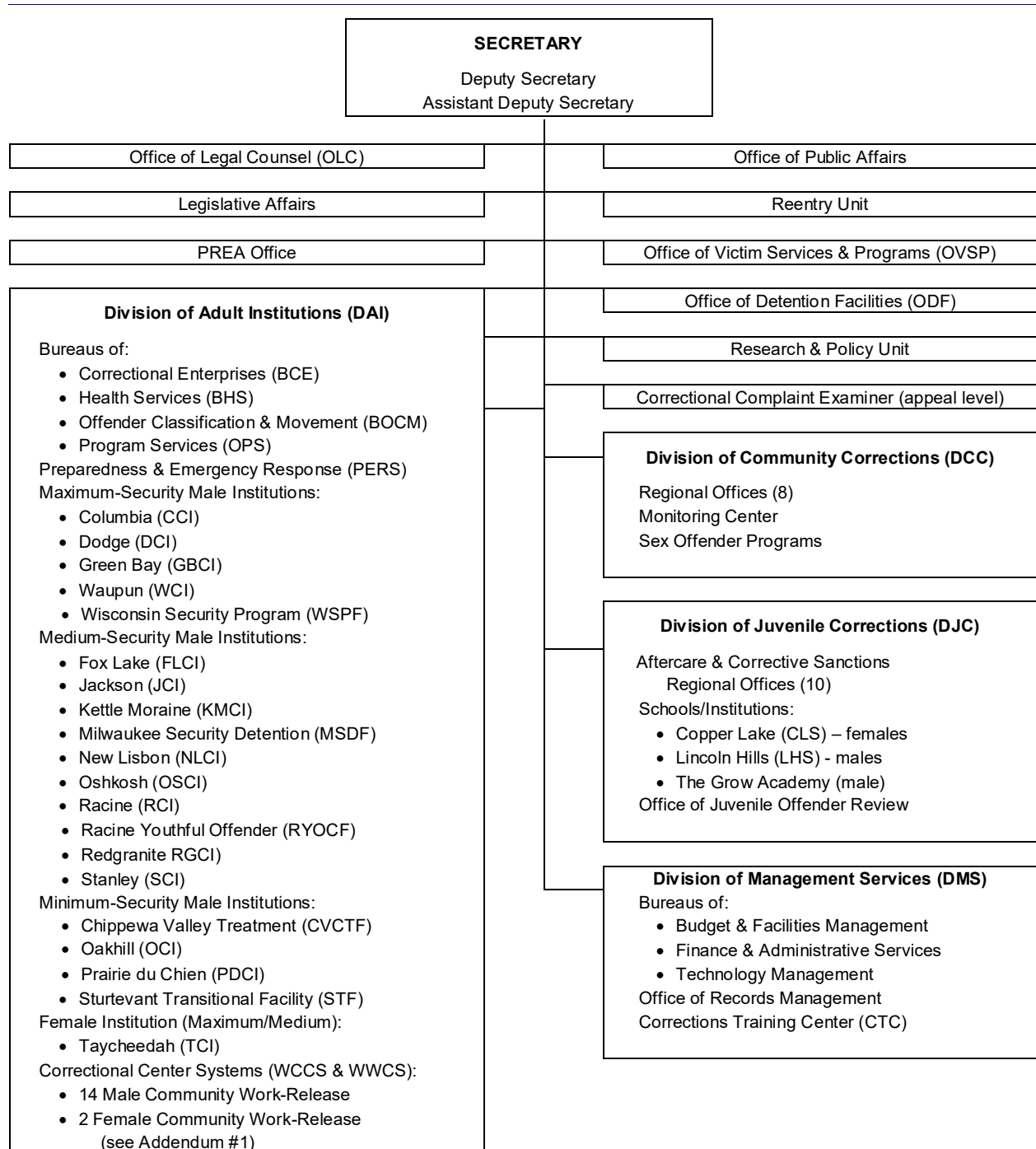
We expect competence and professionalism in our communications, demeanor, and appearance.

- We demonstrate knowledge and skills within our areas of responsibility.

- We respond effectively and appropriately in our interactions and communications.
- We treat all people with dignity and respect.
- We recognize that we have one opportunity to make a positive first impression.

A detailed history of the Department of Corrections and facilities is available on the website. <https://doc.wi.gov>

ORGANIZATIONAL CHART



RECRUITMENT OF NON-DOC PERSONNEL & TYPICAL ROLES

DAI recruits volunteers and establishes relationships with business and professional visitors from all cultural and religious segments of the community. You serve as a positive role model from whom PIOC can learn pro-social behavior. Your role may help bridge a gap between PIOC and the community. The value and impact you have on their lives cannot be measured.

Additionally, you are of tremendous assistance to the Department by supplementing the programs offered to PIOC or providing new activities, thereby increasing options to gain new skills and have positive experiences. We trust that your time working within DOC facilities will be a rewarding experience.

Non-DOC Personnel coming into correctional facilities may serve in a variety of roles. Depending upon skills and experience, some Non-DOC Personnel may perform more than one function. See Addendum #2 – *DAI Policy 309.06.03 Attachment A: Non-DOC Personnel, Business & Professional Visitors – Category, Training & Status Matrix* for detailed descriptions of the various roles community members may perform within Wisconsin correctional facilities.

APPLICATION PROCESS & CHANGES

Community Members Seeking Facility Entry Privileges

- ⇒ For volunteer activities or student internships – contact the facility to assess opportunities and initiate the application process locally.
 - ⇒ For a business-related purpose such as vendor, contractor, other government agency, legal services, etc. – coordinate the application process through your employer (DAI will process at the facility or statewide level, as appropriate).
1. Upon receipt of each contact, facilities will determine the proposed role is suitable before issuing an application. DAI will not process unanticipated/unsolicited DOC-2674.
 2. DOC staff will provide application form DOC-2674 and instructions for submitting electronically or via paper.
 - By signing and submitting the DOC-2674, you authorize DOC to conduct a criminal history background check. This important security precaution is applied to each individual entering Wisconsin correctional facilities with extremely limited exceptions (e.g. law enforcement, emergency services).
 - After initial approval, Non-DOC Personnel may have subsequent background checks conducted intermittently at the direction of each facility Warden/designee.
 3. You will be informed of approval by email or phone. If your application is denied, you will be notified by mail. At each Warden/designee's discretion, some Non-DOC Personnel may be approved to serve at more than one DAI facility.
 4. Non-DOC Personnel who have not entered any facility for one year become inactive, and must re-apply for facility entry privileges.

Orientation Expectations

Once approved, you will be instructed to undergo orientation at the level corresponding with your role. Addendum #2 details the training levels, which will be based upon anticipated facility entry frequency and level of PIOC contact.

- Level 3 orientation including full review of this manual is required for those entering DAI facilities five (5) or more times per year. This may be completed at any DAI facility or virtually.
- Level 2 orientation may be sufficient for those entering facilities less frequently or with supervised PIOC contact.
- Level 1 orientation (PREA training within the DOC-2674 application) may be the only requirement for some Non-DOC Personnel depending upon roles.
- Non-DOC Personnel with facility entry privileges at multiple sites will receive site-specific training at each location.
- Please note that higher level orientation than specified may be required on a case-by-case basis, including role-specific Level 4 content provided through your employer. Ask your Staff Advisor for clarification.
- All Non-DOC Personnel are required to undergo updated orientation each calendar year consistent with the level detailed on Addendum #2.

Eligibility Changes and Law Enforcement Contact

Non-DOC Personnel must disclose any/all law enforcement contact or criminal court interactions. Facility entry privileges may be affected by events or issues occurring in the community outside of correctional facilities. Disclosure is important – **even if you were not at fault**. Staff must assess any situations which could pose a facility security concern or potential conflict of interest.

Notify your Staff Advisor (or another available staff member) by the next business day of any change to your application disclosures, including (but not limited to):

- Arrest or charge, and any updates or outcome of court proceedings
- Non-DOC Personnel becomes aware law enforcement has identified them as a possible subject in a police investigation
- Non-DOC Personnel is subject to a restraining order or injunction
- Non-DOC Personnel is placed under a deferred prosecution agreement

DOC cannot require you to disclose circumstances in which you were a victim of a crime. However, it may be wise to do so if the event(s) may impact your ability to carry out your approved Non-DOC Personnel role.

Only staff members whose specific job duties require access can view DAI Non-DOC Personnel records containing personally identifiable information (PII) or criminal history record information.

LINE OF SUPERVISION & COMMUNICATION WITH STAFF

The correctional environment is unique. Because it is unfamiliar to most people, the line of supervision and communication will help you function in your new role.

- **Staff Advisor:** A designated member of the staff, responsible for the oversight of your program participation at that facility. There may be multiple Staff Advisors at each facility, overseeing different kinds of programming. This person is your direct contact with the facility and will inform you of policy and procedure updates.
- **Facility Non-DOC Personnel Coordinator(s):** The Warden/designee will assign one or more supervisory level staff members to coordinate and oversee various Non-DOC Personnel activities at the facility.
- **Officer Staff:** The uniformed staff responsible for the order, safety and security of the facility. Correctional officers and sergeants are typically called “blue shirts”; supervisory officers (Captains or Lieutenants) are typically called “white shirts.”
- **Shift Commander/Shift Supervisor:** Uniformed staff responsible for facility operations for the assigned shift. They may temporarily prohibit facility entry; postpone or cancel a program or event; or suspend Non-DOC Personnel participation if necessary to maintain control of the PIOC population and facility safety and security.
- **Warden and Deputy Warden or Superintendent:** The chief administrative officer and deputy are responsible for overall facility operations. Centers are administered by a Superintendent, with oversight by the WCCS or WWCS Warden.

Interaction with staff must be professional at all times. It is unacceptable to have a confrontation with or challenge a staff member’s authority in front of PIOC. Always be sensitive to the fact that conversations may be overheard by PIOC. Never disclose such conflicts to PIOC because the incarcerated population may exploit disagreements between staff and Non-DOC Personnel (even PIOC not directly involved in the matter).

If you cannot resolve an issue privately with a staff member, please discuss it with the Facility Non-DOC Personnel Coordinator. Ask to speak with the Shift Commander while still onsite within the facility if necessary to immediately address safety and security concerns or time-sensitive matters.

Addendum #3 offers a quick reference detailing which staff member(s) you should contact in specific circumstances and the level of urgency for reporting information.

NON-DOC PERSONNEL INTERACTION WITH MEDIA & SOCIAL MEDIA

Victim impact is a primary consideration in all DOC news and media interactions – including those in which Non-DOC Personnel may purposefully or inadvertently disclose events or issues within facilities.

The DOC Communications Office, in consultation with the DOC Secretary, must preapprove public speeches, lectures, story proposals for media coverage or proposed articles for publication involving facility or Department activities. Photos of facilities, PIOC, employees, or facility activities require prior approval of the warden and may also require a signed release from PIOC.

For that reason, DAI also advises Non-DOC Personnel to avoid posting details of your DOC activities on social media (e.g. Instagram, Facebook, Pinterest, Snapchat, Twitter, etc.) and ensure your security settings are up-to-date. Be mindful your social media presence may be accessible to PIOC through family and friends in the community. Personal information gleaned from social media posts could be used for illicit purposes (see *The Sting: Anatomy of a Set-Up* section).

Please direct any questions or requests to the Facility Non-DOC Personnel Coordinator.

PIOC CONTACT WITH THE OUTSIDE WORLD

DOC's core mission is to protect the public. For this reason, PIOC contact with the outside world is limited and carefully monitored. A quick review of news stories across the country shows PIOC have repeatedly circumvented communication rules to escape or engage in illegal activity. Examples include everything from intimidating victims/witnesses, running a criminal enterprise (e.g. drug distribution, human trafficking, gang activity) or even murder. The following limits on PIOC communication are strictly enforced.

Be Aware...

DOC's Fraternization policy prohibits Non-DOC Personnel from any PIOC personal visitation, phone contacts or correspondence. This is consistent with rules for DOC staff members.

With prior approval via DOC-2270A process, an exception to this policy may be granted giving permission for PIOC personal contacts outside their approved Non-DOC Personnel role. See the Fraternization section below.

- *Never give any PIOC your personal mailing address, phone or email contact information without express written permission via approved DOC-2270A.*
- *If you receive a phone call, correspondence or email from any PIOC, a PIOC's family member or another person contacting you on behalf of a PIOC – notify your Staff Advisor, Facility Non-DOC Personnel Coordinator, and/or Shift Supervisor by the next day. You will be asked to provide the correspondence and/or be interviewed for investigative purposes.*

Visits: PIOC may receive in-person and video visits consistent with DAI Policy 309.06.01. DOC carries out background checks on all PIOC Personal Visitor applicants.

- Non-DOC Personnel cannot be on any individual PIOC visiting list without prior approval via the DOC-2270A procedure; nor can they be on any PIOC visiting lists at a site where they are in active status for their approved Non-DOC Personnel role (see *Fraternization* section).
- Each facility has sign-up procedures and schedule for PIOC Personal Visitors posted on the site website.
- Non-DOC Personnel professional visits with individual PIOC – including legal services and pastoral care – may be conducted during visiting hours. Some facilities may offer a separate time and/or a private consultation room, depending on logistics. Check with your Staff Advisor for site-specific questions.

Phone: Phones are available for PIOC personal calls to family and friends; PIOC cannot receive calls. Social workers can arrange calls in time of a family emergency. All phone calls are recorded and monitored for investigative purposes. Personal cell phones are prohibited inside all DOC facilities.

- Three-way calls are prohibited to prevent PIOC from communicating with unidentified individuals.
- Never make or accept calls on behalf of any PIOC.

Mail: PIOC mail (both incoming and outgoing) is monitored by staff. All outgoing mail is stamped as being sent from a correctional facility. All incoming correspondence is photocopied and originals are shredded because illicit drugs are frequently transmitted via saturated paper.

- Never mail anything out for any PIOC. Individuals helping PIOC circumvent mail monitoring in this manner have unknowingly been complicit in illegal activities.
- Never provide envelopes or stamps to any PIOC.

Email: PIOC may have access to email through DOC-approved non-internet electronic tablets or “kiosk” technology. Consistent with security protocols for regular mail, these email communications are monitored by DOC staff.

Computers/Electronic Devices: PIOC may use facility computers with restricted internet access for educational or reentry programming, job search or legal research. They may also use a DOC-approved and monitored, non-internet personal electronic tablet for movies, music, games.

- Beyond these controlled avenues, PIOC possession or access to electronics is strictly prohibited
- Staff members, Non-DOC Personnel and PIOC personal visitors are strictly prohibited from bringing any personal devices with capability for cellular or wireless communication into any DOC facility (e.g. phones, smart watches, electronic book readers, flash drives, etc.).

PIOC RESOURCES

DOC Administrative Code 309

DOC accommodates PIOC basic needs by providing access to a variety of programs, services and resources. Non-DOC Personnel assistance or advocacy for individuals PIOC is not necessary or appropriate in the following areas:

- **Canteen:** PIOC may purchase a variety of snacks, personal hygiene items, office supplies and hobby items through canteen vendors. These are considered convenience items, since DOC provides each PIOC with basic necessities (see relevant sections on dietary, medical, hygiene, etc.).
- **Criminogenic Needs:** PIOC criminal behavior and re-offense risk is assessed at initial classification and unified case plans are developed to address individual risks and needs; reassessment occurs at regular intervals. Evidence-based practices determine treatment or education needs. PIOC are transferred to facilities that offer needed programming. Some programs have wait lists. Enrollment will occur with sufficient opportunity to complete prior to discharge. After release, community corrections agents may assign some offenders to participate in further programming or aftercare based upon assessed risk.
- **Dietary:** DOC provides three meals daily to more than 23,000 PIOC. Menus are developed by dietitians to meet daily nutritional and caloric needs. PIOC with medical needs and religious diets are accommodated. Vitamin supplements are provided when medically necessary.
- **Disabilities Accommodation:** Individual accommodations are provided for PIOC with physical, cognitive or emotional disabilities. *Executive Directive 17 - Nondiscrimination and Reasonable Accommodation* and *DAI Policy 300.00.35 - Americans with Disabilities Act* ensure compliance with federal and state laws.
- **Family Supports:** Facilities may offer special programs to assist PIOC with maintaining family relationships. Examples include Read-to-Me, Talking Letters, holiday gift giving, greeting card programs, photographs, parenting classes, family reunification visitations, holiday events, family meals, etc. Non-DOC Personnel must be extremely sensitive to trauma experienced by family members (sometimes crime victims themselves). Interact with these individuals only with prior approval via DOC-2270A (see *Fraternization* section).
- **Financial Accounts:** PIOC cannot possess currency. DOC provides financial services to manage funds, including savings, release accounts and general monies which may be used for canteen purchases, postage, property items, etc. DOC's fraternization policy prohibits Non-DOC Personnel from giving money to PIOC.
- **Hygiene:** DOC provides basic hygiene supplies including toothbrush, toothpaste, soap, toilet paper, towels, washcloths, laundry services, haircuts, shaving accessories,

etc. PIOC may purchase specialty items as desired through DOC's contracted canteen and property vendors.

- **PIOC Pay:** PIOC are afforded the opportunity to receive pay, build job skills and experience through jobs within facilities (custodial, food service, etc.), work release programs, or program/education participation. PIOC on waiting lists for programs or jobs may also receive minimal compensation.
- **Language Assistance:** PIOC with limited English-language skills have access to interpretation (verbal) or translation (written) at no cost. Executive Directive 71 - Language Assistance Policy and Implementation for Addressing Needs of Offenders with Limited English Proficiency (LEP) and DAI Policy 300.00.61 - Language Assistance for Limited English Proficiency (LEP) PIOC ensure compliance with federal laws.
- **Legal Counsel:** PIOC have access to private attorneys and Public Defender services, as well as Legal Assistance to Institutionalized Persons (LAIP) to assist with criminal defense and other personal legal issues. LAIP is a free service to PIOC available through the University of Wisconsin Law School Remington Center.
- **Library:** All facilities have legal references for PIOC; most facilities have a full library for personal study or recreational use. A few sites offer inter-library loan with community libraries to access requested publications. Facilities also offer religious/spiritual resources within the main library or via separate chapel libraries.
- **Medical Care/Psychological Services:** Health needs are addressed through on-site Health Services Unit (HSU) including dental, vision care, and Psychological Services Unit (PSU) staff. Outside providers are utilized as needed for emergency care and specialty clinics. DOC covers costs for medically necessary care, procedures and supplies. Wisconsin Statutes require modest co-payments for some appointments.
- **Personal Property:** DOC provides basic clothing, shoes and linens. PIOC may purchase additional items, including personal clothes, religious property, hobby items, electronics, etc. from contracted canteen and vendor catalogs. DAI policies allow purchase from outside vendors in limited circumstances when safety and security protocols permit.
- **Release:** Release plans are developed with the assistance of Social Workers and community corrections agents within case management. PIOC are referred to community resources, as needed. The DOC fraternization policy allows religious volunteers to assist with limited reentry supports (e.g. post-release clothing, employment assistance, housing, transportation, etc.) when prior approval is granted via the DOC-2270A process (see *Fraternization* section).
- **Social Services:** Each PIOC has a Social Worker assigned to assist with case management, connection to community resources, facilitate family contacts as needed, personal counseling, forms completion and preparation for community

reentry. Most PIOC are also assigned to a community corrections agent in the community who will help prepare for and supervise them upon release.

DOC REENTRY INITIATIVE

The DOC Reentry Initiative was launched in 2005 to enhance community safety by improving the process for PIOC to return to the community. The Reentry Initiative promotes offender accountability and success from sentencing, through prison release and community supervision. The DOC continues to develop programming and redefine business processes to meet this objective.

For each offender, DOC assesses conditions that led to criminal behavior and provides programming to reduce or eliminate those conditions. In this way, the likelihood that these individuals will adopt pro-social, productive, law abiding lifestyles is increased. Offender behavior change and successful reentry is good for victims, communities, taxpayers, and public safety.

Implementing evidence-based practices is a priority to meet the public's expectations for quality, efficiency, effectiveness and fairness. All DOC staff are part of the corrections team and share a common approach and commitment to enhancing public safety.

Evidence-based practice principles include:

- Assessing individual criminogenic needs
- Targeting interventions (education, skills training and treatment programs) to address individual criminogenic needs
- Case management to ensure continuity of program goals from sentence through incarceration and community supervision
- Enhancing offender incentive to change through use of motivational interviewing
- Training DOC staff in use of programs that research demonstrates to be effective
- Increasing positive reinforcement
- Outcome measurement

OFFICE OF VICTIM SERVICES & PROGRAMS

The DOC Office of Victim Services and Programs (OVSP) provides advocacy and information to crime victims, their families and the community.

Common areas of OVSP support include assisting victims with concerns about offender status and location, restitution, the parole process, release dates, victim/offender dialogue when desired, addressing unwanted contact from offenders, and other questions. The goal of OVSP is to promote safety and restore some control in the lives of those affected by crime.

Information and Notification

The OVSP also supports two important information and notification services. Enrollment into these services is optional, confidential and is not disclosed to offenders.

- **WI DOC NOTIS**: DOC NOTIS provides notification, information and support to victims of offenders in the custody or supervision of the Wisconsin DOC, persons required to register with the Wisconsin Sex Offender Registry, and patients committed to the Wisconsin Department of Health Services.
<https://notis.doc.state.wi.us/notisExt/login>
- **WI VINE**: information/notification about offenders/defendants in county jails available at vinelink.com or by calling 1-888-944-8463.

Victim Contacts & Written Apology Letters

Non-DOC Personnel should **never** contact an offender's crime victim(s). A victim would potentially find unexpected contact very harmful, even if made with good intentions. If an offender requests that contact be made with their victim(s), that request **must** be reported to the facility staff immediately.

DOC maintains a stringent procedure to protect victims' privacy and safety concerns. PIOC who ask for assistance with victim apology letters should be redirected to their Social Worker and OVSP resources.

<https://doc.wi.gov/Pages/VictimServices/VictimServices.aspx>

PIOC COMPLAINT PROCEDURES

DOC Administrative Code 310

PIOC who raise facility issues with Non-DOC Personnel should be directed to follow the complaints process. This is formal procedure for PIOC to problem-solve and address grievances. Each facility has an Institution Complaint Examiner (ICE) assigned by the Warden to confidentially investigate and respond to PIOC complaints. After investigation, the ICE reports directly to the Warden who renders a decision on the complaint. PIOC dissatisfied with the facility decision may appeal up the chain of command for a final decision by the Secretary's Office. PIOC must exhaust these administrative remedies before they can access civil courts. Learning to follow such procedures empowers PIOC to resolve issues independently, which is also an important life skill and rehabilitation goal. Non-DOC Personnel should not engage in advocacy on behalf of PIOC, which can border on fraternization.

PIOC RELIGIOUS ACCOMMODATIONS

DAI Policy 309.61.01 - Religious Beliefs & Practices

& Attachment: Congregate Religious Event Conduct

DAI Policy 309.61.02 - Religious Property

DAI Policy 309.61.03 - Religious Diets

The DOC recognizes spirituality can play a role in PIOC rehabilitation. DAI Policies provide PIOC with opportunities to practice their religious beliefs, individually and in congregational programming. A majority of religious activities are facilitated by community volunteers, who help DOC offer a wide range of services and study groups and serve as pro-social role models.

DAI policies organize accommodations via an Umbrella Religion Group (URG) structure. This was developed in consultation with community religious leaders to help DOC address the diverse faith traditions of Wisconsin's population and those in custody. The URGs are intended to represent and accommodate a range of similar beliefs and practices, and may also include some divergent or unique traditions. The URGs also allow DOC to efficiently and effectively allocate limited resources of space, time, staffing, volunteers, donated materials, etc..

DOC must always balance a PIOC's right to participate in religious activity (including the right to religious property and dietary accommodation) with the importance of maintaining safety and security for the public, PIOC, staff members, Non-DOC Personnel, and PIOC personal visitors entering our facilities. DOC administers religious programming, property and dietary accommodations in the least restrictive means necessary to manage compelling governmental concerns. Therefore accommodations mirror community practices as closely as possible. Even so, security concerns will sometimes override certain religious practices or property items when there is no alternative – and the reason may not always be apparent to Non-DOC Personnel or the public. Please discuss any questions about this with your Staff Advisor, rather than raising issues directly with PIOC.

It is also important to understand religious issues are a growing subject of PIOC civil litigation throughout the country. DOC has carefully crafted policies to ensure compliance with state and federal statutes and evolving case law. Consistency in following policies and procedures is one of the best ways to ensure fair and safe religious accommodation for all PIOC, and mitigate the need for litigation.

Managing PIOC Participation – Leadership Roles are Strictly Prohibited

For all these reasons, religious volunteers and pastoral visitors must be aware that prison ministry is distinct from community ministry in key ways:

- See Addendum #4 - DAI Policy 309.61.01 Attachment: *Guidelines for Conduct in a Congregational Setting*, which notifies PIOC of acceptable and prohibited behaviors.
- While leadership is a desirable quality in the community, some PIOC in a correctional facility may take advantage of leadership roles to manipulate others. PIOC attempting to exercise leadership can endanger safety and facility security. Therefore, DOC PIOC are not allowed to lead program/activities/events.
- In the prison setting, security threat groups (STG) – street gangs and hate groups – have attempted to co-opt religious programming to pursue their STG agenda. Only the Chaplain/designee or an outside spiritual leader may lead a service or study group. This rule reduces opportunities for PIOC to gain power and engage in coercion or strong-arming among others.

- Professional boundaries must be prioritized at all times (*Review Maintaining Professional Boundaries and Fraternization Policy*). Ministry cannot foster friendship between staff/volunteers and PIOC.
- Do not trust any PIOC's intentions. Even if you perceive a particular PIOC to be honest and forthright, others may use information for subversive agendas (*Refer to Anatomy of a Setup*).
- Absolutely nothing should be confidential from staff. If a PIOC indicates that "only you" can understand... help them... support their needs... are comfortable to talk with... this can be a warning sign of a set-up. Discuss with your Staff Advisor immediately.

Ask staff members to assist in managing PIOC behavior, as needed. Staff and Non-DOC Personnel must be firm and consistent about prohibiting PIOC from taking a leadership role in any type of program or group setting. Always discuss any questions or concerns with your Staff Advisor.

Cautions about Sensitive or Controversial Topics

If a DOC policy or practice conflicts with your personal religious beliefs, please address this with your Staff Advisor. **Never** share this with any PIOC. One specific example: During a religious study a volunteer expressed negative beliefs about DOC's secular/non-religious Substance Use Disorder (SUD) treatment, which several PIOC interpreted as encouragement to refuse participation as demonstration of their faith. But PIOC also knew refusal of DOC's assigned programs could affect their progression toward lower security/custody level, work assignments, and even delay community release in some circumstances. PIOC distress over such issues created conflict between PIOC, as well as DOC staff. It had a negative impact on the overall facility climate.

Keep in mind that – as in the broader community – divisive issues such as LGBTQI+, abortion, and politics, etc. can be especially inflammatory inside a correctional facility. The PIOC population is very diverse and must find ways to tolerate one another's beliefs while living together in close confines. For this reason, **denigrating other religions or beliefs is not permitted**. Non-DOC Personnel facility entry privileges may be jeopardized if their statements or activities could lead to a hostile and unsafe facility environment. This is not to suggest DOC intends to impose upon our volunteer's religious exercise – nor that DOC even holds a position on these sensitive issues. Rather, sometimes in the prison setting each individual's free speech rights must be limited to maintain good order.

PIOC CONDUCT & DISCIPLINE

DOC Administrative Code 303

PIOC are held to an expectation of appropriate behavior for facility safety and rehabilitation objectives. Specific rules and potential consequences for violations are outlined in the administrative code. A conduct report (commonly referred to as a "ticket") may be issued. The PIOC is entitled to due process. If PIOC are found guilty of violating a rule, a disposition or penalty is issued.

Common rule violations include:

- **Contraband**: possessing any prohibited item
- **Disrespect**: may include verbal or written communication
- **Disruptive Conduct**: may include overt behavior which is loud, offensive, argumentative, horseplay, or annoying to others, or physically resisting staff
- **Disobeying Orders**: failure to follow a verbal or written directive from staff
- **Unassigned Area**: not in the scheduled/assigned area, or in a prohibited area
- **Unauthorized Transfer of Property**: giving or sharing items with another PIOC without staff permission

Soliciting staff (including Non-DOC Personnel) – PIOC engaging in the following are committing a serious violation:

- [DOC 303.30\(1\)](#) Offer or give anything, or coordinate another person to offer or give anything
- [DOC 303.30\(2\)](#) Request or accept anything
- [DOC 303.30\(3\)](#) Buy anything from, or sell anything to
- [DOC 303.30\(4\)](#) Request to purchase anything for the PIOC
- Convey affection to, or about staff/Non-DOC Personnel
- Ask for personal addresses, phone numbers
- Ask for favors or special attention

Dispositions/penalties generally follow a progression from less to more severe. Typical dispositions may include:

- Loss of privileges (recreation, phone, day room, electronics, etc.)
- Extra duty (cleaning, snow shoveling, yard work, etc.)
- Building or room confinement
- Disciplinary separation is a sanction imposed for serious/major conduct violations. It is served in the restrictive housing building, commonly referred to as “segregation,” “seg,” or “the hole.”

Restrictive Housing(RH)/Temporary Lock-Up (TLU)

PIOC in restrictive housing are kept apart from the general PIOC population. Movement is very limited, as is personal property. Only non-contact visits (behind partition or video) are allowed, including professional legal and pastoral visits. The length of sanction is based upon the severity of violation, as specified in the administrative code.

Temporary Lock-Up (TLU) is a non-punitive status, where the PIOC is placed into restrictive housing. Generally, TLU is used when their personal safety is at risk, to maintain the integrity of an investigation, or to prevent disruption to facility order.

PIOC in restrictive housing have limited opportunity to participate in religious programs/activities/events. Please be aware that staff may not know when a particular PIOC will return to general population.

PRISON RAPE ELIMINATION ACT (PREA) & SEXUAL MISCONDUCT

Executive Directive 72 – Sexual Abuse and Sexual Harassment in Confinement (PREA) *Executive Directive 16A – Staff Sexual Assault of Offenders*

The *Prison Rape Elimination Act (PREA) of 2003* is a federal law enacted to prevent, detect and respond to reports of sexual abuse/harassment of persons in correctional custody in all jurisdictions (i.e. federal, state, county, municipal). *ED 72* aligns with the federal law's standards and provides direction for supervising PIOC, educating PIOC and staff, reporting and investigating incidents of sexual abuse, providing medical and mental health care following a report, and disciplinary sanctions for those engaged in sexual abuse/harassment. Most notably, *ED 72* sets forth a zero-tolerance standard concerning sexual abuse/harassment among PIOC and between staff (which includes Non-DOC Personnel) and PIOC.

In addition to *ED 72*, *WI ss 940.225 (2)(h)* makes it a criminal offense for staff and Non-DOC Personnel to have any sexual contact with PIOC; it presumes that consent is not possible due to the unequal power differential between PIOC and those in authority. Criminal conviction may result in a fine up to \$100,000 and/or up to 40 years imprisonment.

Non-DOC Personnel may be privy to things PIOC are hesitant to share with staff members. Be aware of subtle indications of PIOC sexual behaviors. For example:

- PIOC theological questions about sexual orientation may represent personal struggles with real-life sexual behaviors with or among other PIOC.
- PIOC make take advantage of congregate religious activities as a venue for “hook-ups” with willing partners.
- Conversely, touching between PIOC may indicate an unwelcomed sexual advance.

Please recognize that a PIOC may be disclosing sexual behaviors or seeking help without asking directly.

To summarize, PIOC cannot consent to any sexual contact.

Staff and Non-DOC Personnel are mandated to disclose the following to a supervisor immediately:

- any knowledge, suspicion or information of sexual abuse or sexual harassment
- retaliation against PIOC or staff who reported such an incident
- any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation

Non-DOC Personnel who learn of any possible sexual conduct by or to any PIOC must report to a staff member for proper follow-up prior to leaving the facility. After reporting, you may provide follow-up information in writing or by phoning their Staff Advisor or Facility Non-DOC Personnel Coordinator, DOC's PREA Director, local law enforcement, and/or submit a report on DOC's website.

All Non-DOC Personnel must review Addendum #5 - *POC-54 Sexual Abuse and Sexual Harassment in Confinement: A Guide for Volunteers and Contractors*.

MAINTAINING PROFESSIONAL BOUNDARIES

Professional boundaries are essential to safety, security and good order of correctional facilities. Interactions with PIOC and staff must remain respectful and professional.

Names & Titles

- Require PIOC to address staff and Non-DOC Personnel by their title (e.g. Captain, Doctor, Misses, Mister, Officer, Sergeant, Warden) and last name.
- Always address PIOC by their last name (Mr./Ms./ PIOC ____).
- Do not use PIOC first names or nicknames.
- Do not use first names or nicknames with other staff or Non-DOC Personnel in the presence of PIOC.
- ***DOC Administrative Code 303.35 - False Names and Titles***
PIOC are prohibited from identifying themselves with titles reflecting positions of authority or honor (e.g. Brother, Chief, Colonel, Corporal, Doctor, Elder, Father, Honorable, Imam, Pastor, Professor, Rabbi, Reverend).

Physical Space/Contact

- Staff and Non-DOC Personnel should not touch PIOC.
- A brief, arm-length handshake may be acceptable on occasion. Check with your Staff Advisor for expectations at the site.
- Maintain an arm's length distance between yourself and PIOC.
- If any PIOC invades your physical space, direct them to step back.
- While hugging, shoulder bumps, etc. may be a common greeting in the community, they are prohibited in the prison environment.
- Recognize some PIOC may misinterpret interpersonal interactions (e.g. expressions, gestures, touch, etc.).

Advocating on Behalf of any PIOC

Non-DOC Personnel often experience sympathy or empathy for a PIOC, especially if they perceive the PIOC is disadvantaged in some way, or believe the PIOC is ill-equipped to problem-solve for him/herself. It is important to remember PIOC are competent adults who have a range of resources at their disposal. A key function of rehabilitation is learning to utilize lawful methods of achieving their goals. PIOC resources are described in this manual to help Non-DOC Personnel be mindful of this objective.

All PIOC must be treated impartially. Non-DOC Personnel cannot “take a PIOC’s side” or give special consideration to any individual PIOC. This includes advocating directly or indirectly in the areas of (but not limited to):

- facility discipline and security level
- corrections programming and treatment
- rules of community supervision
- employment and housing

- medical and mental health issues
- parole, pardon, commutation or judicial matters

Instead of advocating on behalf of a PIOC, please encourage PIOC independence to problem-solve and advocate appropriately for themselves.

PIOC Perceptions of Non-DOC Personnel as Romantic Partners

Please realize that, through no fault or encouragement on your part, a PIOC may still:

- Consider you as a potential girlfriend/boyfriend – even if you are married
- Fantasize about the scope and extent of your relationship
- Label you “his/her property” and threaten others who try to talk to you

Remember that at the end of the meeting you return to a full, busy life. The PIOC must return to their restrictive world. Do not allow a PIOC’s perception of you to override the rehabilitative message that you bring with your program/service/activity.

Providing Material Support to PIOC

DOC prohibits Non-DOC Personnel from providing money or other direct support to PIOC. The primary purpose of performing work in a correctional facility is to support the DOC’s rehabilitation mission through the programs/services/activities you facilitate or services you provide. Some professional roles may involve working individually with a PIOC on specific goals (e.g. legal services, employment assistance, disabilities advocacy, etc.). But singling out individual PIOC for special attention or help within group or congregate programming can:

- Undermine PIOC rehabilitation and successful reentry to the community;
- Reduce PIOC motivation to develop skills, seek help through appropriate channels, and utilize available resources;
- Invite PIOC to become reliant upon your support instead of developing resilience and independence;
- Leave PIOC ill-prepared or unwilling to transition to spiritual care or support from other professionals;
- Weaken the effectiveness of your program/service/activity for all PIOC participants if awareness of individual support provided to a peer becomes a distraction;;
- Lead to a power imbalance among PIOC and make the support recipient a target for extortion;
- Demonstrate your willingness to circumvent rules by providing something directly to PIOC; this can become an invitation to be strong-armed into providing more or being solicited by other PIOC;
- Create facility safety and security problems.

Please review Addendum #6 which references the *American Association of Pastoral Counselors (AAPC) - Code of Ethics*. Consider whether your impetus to provide material support to an individual PIOC is a warning sign that your feelings have evolved beyond professional boundaries to a more personal relationship.

FRATERNIZATION POLICY

Executive Directive 16

ED 16 and the DAI Non-DOC Personnel, Business & Professional Visitors policy apply to staff and Non-DOC-DOC Personnel interactions with:

- any adult or juvenile offender (i.e. PIOC in DOC custody along with individuals under community corrections supervision)
- the spouse or relative of an adult or juvenile offender
- the children or legal guardian of an adult or juvenile offender
- other persons who reside in the same household as an offender

The Fraternization Policy helps manage potential conflict of interest or professional boundary violations. Depending upon your approved Non-DOC Personnel role, DOC may expect you to have ongoing contacts with PIOC. In general, be aware:

PERMISSIBLE INTERACTIONS	PROHIBITED INTERACTIONS
<p><u>Professional Relationships</u></p> <ul style="list-style-type: none">• At all times, Non-DOC Personnel must maintain professional boundaries of their approved role under this policy (e.g. Pastoral Visitor, Case Manager, Employment Support, Legal Assistance, Veterans Services, etc.) and abide by all other fraternization expectations.• Non-DOC Personnel with an approved DOC-2270A may provide ongoing counseling, spiritual guidance and personal growth encouragement to PIOC upon release from DAI and while under the supervision of DCC.• Non-DOC Personnel with an approved DOC-2270A may participate and/or coordinate reentry support services of external organizations which provide PIOC releasing from DAI custody with clothing, housing, transportation, etc.• With an approved DOC-2270A, Non-DOC Personnel who anticipate providing professional services or reentry assistance <u>in advance of a PIOC's discharge</u> from DAI custody shall contact the assigned Social Worker. This allows coordination through routine discharge planning procedures in consultation with the assigned DCC agent (approximately six months prior to PIOC is released from DAI custody).• Non-DOC Personnel representing organizations with which DOC has a partnership consistent with DAI policy 309.06.03 may be exempt from submitting DOC-2270A for individual PIOC <u>if specified in the agreement</u>.	<ul style="list-style-type: none">• Non-DOC Personnel (except legal services performing professional duties) shall not personally intercede on behalf of an individual under DOC custody or supervision regarding:<ul style="list-style-type: none">○ Facility discipline○ Classification/programming○ Rules of supervision○ Employment○ Petitions for parole, pardon, commutation or judicial matters• Non-DOC Personnel shall not transfer information or messages between individuals in the community (including PIOC under DCC supervision) and PIOC in DAI or DJC custody (neither direction), nor between PIOC at different facilities.• Non-DOC Personnel shall not reside in the same household or directly employ PIOC under DCC supervision unless express permission is given via DOC-2270A procedure.• DAI shall make referral to law enforcement if Non-DOC Personnel violate federal or state laws including:<ul style="list-style-type: none">○ Deliver, conceal, or intend to deliver any articles/materials to PIOC in correctional facility without express permission from facility personnel (including but not limited to electronic communication/storage devices).○ Receive any items from PIOC with intent to convey out of a correctional facility without express permission from facility personnel.○ Possess or attempt to possess any controlled substances on correctional facility grounds.

<p><u>PIOC Personal Relationships</u></p> <ul style="list-style-type: none"> • Subject to DOC-2270A approval, Non-DOC Personnel may be on PIOC visiting list(s) at DAI facilities where they are <u>not in active status</u> or do not perform duties as approved under DAI policy 309.06.03. • Non-DOC Personnel shall only have personal contacts with PIOC in DOC custody or under DOC supervision <u>with express permission via DOC-2270A procedure</u>. This includes phone calls, correspondence via letters or email, exchanging personal information, etc. 	<ul style="list-style-type: none"> ○ Have sexual contact or engage in sexual harassment of incarcerated PIOC. ○ Assist in an escape.
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Fraternization Policy Exception Request Procedure:

Recognizing that many staff and Non-DOC Personnel may know PIOC or offenders from the community, DOC has a procedure for notification. Any contact that could appear to violate policy must be reported. Depending on the circumstance, a *Fraternization Policy Exception Request* (see Addendum #7 - form DOC-2270A) may need to be processed. The form is submitted to the facility Non-DOC Personnel Coordinator, who will forward this up the chain of command for final consideration.

What if I am unexpectedly contacted by, or see a former PIOC in the community?

- Notify your Staff Advisor by the next business day.
- The Staff Advisor may document this event with an Incident Report.
- You may be instructed to submit a Fraternization Policy Exception Request (DOC-2270A).
- DOC will assess whether the relationship/situation will pose a conflict of interest with your approved Non-DOC Personnel role at any DOC facilities.
- Contact with that PIOC/offender should be limited until the Facility Non-DOC Personnel Coordinator provides further guidance or the Fraternization Exception is processed.

Direct questions about the Fraternization Policy to your Staff Advisor.

THE STING: ANATOMY OF A SET-UP

We have all heard the stories of staff or Non-DOC Personnel who have crossed a line; some may have inadvertently become victims of PIOC manipulation and what's known as "the set-up." This section is intended to prevent that from happening to you. The 14-Steps summarized below were originally described by Bud Allen and Diana Bosta in a comprehensive book, *Games Criminals Play: How You Can Profit by Knowing Them*.

For the most part, we have lived our lives surrounded by people we trust and can rely on in our daily routines. We tend to give people the benefit of the doubt and pay little attention to the idea that someone would deceive us.

In the prison setting, unfortunately kindness and compassion may be exploited by PIOC for various reasons. There are PIOC who know almost instinctively how to manipulate others. Coercion has, in many cases, become a lifestyle. Some PIOC have honed their skills over many years of committing crimes and being incarcerated. Some became manipulative as a way to survive. It may be such a habit, they don't really even think about what they're doing. Some have developed intricate and sophisticated systems of deception – often for the sole reason this game provides entertainment for an otherwise mundane daily existence.

The average set-up is a slow process because it is very subtle. Set-ups can go on in full view of others without being recognized. Depending on the victim's susceptibility level, however, set-ups can occur in just weeks. To understand the set-up, one must realize how manipulation works.

Manipulation

Manipulation means to manage or use a process to one's own advantage by artful, unfair, or insidious means. PIOC use "the set-up" to manipulate individual targets/victims.

Characteristics typically identified as good qualities in broader society – friendly, compassionate, helpful – may make one a target. Your education, years of experience, rank, gender, ethnicity, and intellect will not protect you from manipulation. Non-DOC Personnel who routinely follows these guidelines may still be targeted, but consistently following rules will discourage manipulation.

The 14 Steps

The set-up involves three processes, broken into 14 steps: techniques, tools, and turnouts. The first two processes (techniques and tools) are considered the "net," which is laid out to catch the victim. In the final process (turnout), the PIOC receives the payoff for exercising patience and the ability to manipulate the victim.

Techniques (Steps 1-3) – PIOC's method of operation	
1	<p><u>Observation Process</u></p> <p>PIOC constantly watch and listen to staff and Non-DOC Personnel. They subtly, slowly, and precisely study movements, words and actions to gather vital information and calculate whether a person would be a good target. Non-DOC Personnel who use PIOC jargon, ignores minor rule violations, plays favorites, and is easily distracted may indicate a potential target who would circumvent rules and regulations. Responses to seemingly harmless questions assist in the construction of this profile.</p> <ul style="list-style-type: none"> • <u>Body language:</u> The PIOC will observe how the Non-DOC Personnel interacts with others. They are trying to assess whether fear can be instilled, or if the target displays a dislike for the system. • <u>Listening/Observation:</u> "The walls have ears." PIOC collaborate to gather and compile information about staff and Non-DOC Personnel, such as: personal contact information, marital status, hobbies and interests, whether the Non-DOC Personnel likes/dislikes certain PIOC or staff, and other seemingly harmless details. Once a target's likes and dislikes are known, the PIOC can feign the interests/attitudes, even if this means studying up on certain topics. The PIOC will attempt to use "common" characteristics to form a relationship with the target. • <u>Verbal Observation:</u> Based upon compiled information and personality profile, the PIOC will collaborate to choose a "turner" who has the most potential to build a close bond with the target. The turner will display qualities which appeal to the target. The group of PIOC will

	<p>coordinate to observe signs of approval/disapproval and whether the target is comfortable/uncomfortable with the topics of discussion.</p> <ul style="list-style-type: none"> • <u>Action Observation</u>: The PIOC will suggest or actually violate a minor rule to test the target's response, assessing potential for manipulation.
2	<p><u>Selection of a Target</u></p> <ul style="list-style-type: none"> • <u>Intentional</u>: Selected and tested based upon gathered information, assessed weakness, and target profile. If the profile proves wrong, target is discarded and they move on to another. • <u>Accidental</u>: PIOC become aware of target making an error in judgement or a change that could make them vulnerable (e.g. job change, financial or family problems).
3	<p><u>Testing the Limits/Fish Testing</u></p> <p>The PIOC will attempt to circumvent minor rules (such as requesting minor contraband items) to assess if, how and when the target will react. The "bait on the hook" is the target's feeling of obligation due to the friendly relationship. The "hook is set" when the target provides the requested items.</p>
<p>Tools (Steps 4-11) - PIOC's manipulation tactics & resources used to turn target</p> <p>NOTE: These steps may proceed in any order.</p>	
4	<p><u>Support System</u></p> <ul style="list-style-type: none"> • <u>Verbal</u> - The PIOC makes supportive comments to develop a sense of togetherness and understanding – directly to the target, or indirectly through conversations with other PIOC. "You're the most helpful person I've met," building the target's ego. • <u>Nonverbal</u> - The PIOC may take subtle actions to make the target's job easier, such as going the "extra mile" without being asked, trying to become indispensable. Pledges of devotion and faith in the target will foster a trusting friendship.
5	<p><u>Empathy/Sympathy</u></p> <ul style="list-style-type: none"> • <u>Empathy</u> - The PIOC uses shared experience, attitude, thought and belief to strengthen the bond with the target. "I have been there, I can relate to how you are feeling." • <u>Sympathy</u> – The PIOC demonstrates pity or compassion for the target's situation.
6	<p><u>Plea For Help</u></p> <p>PIOC uses target's desire to help to their advantage, further drawing them into a relationship and expanding the scope outside the target's assigned/approved duties.</p> <ul style="list-style-type: none"> • <u>Self-defeat</u> – "I've been a failure my whole life." • <u>Flattery</u> – "You're the only one who can help me." • <u>Direct request</u> – "Please help!" • <u>Confidentiality</u> – "I have to tell you something, but do not tell anyone."
7	<p><u>We/They Syndrome</u></p> <p>PIOC takes subtle actions to separate or distance the target from others;</p> <ul style="list-style-type: none"> • Encouraging the target to turn to them for ego support (e.g. "They don't appreciate Non-DOC Personnel;" "They're wrong about you;" "They do not know you like I do..."). • Creating dissension by commenting to staff/ Non-DOC Personnel about the target. • Dwelling on a cause – taking same position/views as target (e.g. race, background, religion, and prejudices).
8	<p><u>Offer Of Protection</u></p> <p>PIOC offers the target protection to demonstrate friendliness and trust, or to take advantage of target's fear.</p> <ul style="list-style-type: none"> • <u>Minor</u> – Offer help to target in response to small rule violations (e.g. "I'll take the heat"). • <u>Serious</u> – PIOC offers warning of danger, assuring they'll protect the target. If target isn't concerned, the PIOC (with others) may stage an event to demonstrate they will "protect" target. Staged event will occur when staff is unable to aid the victim, thereby making target feel grateful for PIOC's intervention.
9	<p><u>Allusion To Sex</u></p> <p>PIOC cannot consent to sexual activity (see <i>PREA</i> section). Even so, PIOC have the urge for sexual gratification. If the objective is sexual in nature, the PIOC will carefully plan and execute situations to deflect attention. Noteworthy points:</p> <ul style="list-style-type: none"> • Allusion to sex can occur anytime the PIOC believes the target will tolerate it based upon the friendship they have cultivated. • The target may be the opposite or same sex as the PIOC. • Comments may be direct – "I had a dream about you..." • Comments may be indirect – "____ said he'd like to have sex with you."

	<ul style="list-style-type: none"> • PIOC may suggest they were defending the target, “I said you’re not like that.” The target’s response will guide the PIOC’s follow-up. A target who stays silent may lead the PIOC to believe sexual talk is acceptable. If the PIOC perceives positive response, the allusion to sex will become more direct.
10	<p><u>The Touch System</u></p> <p>The PIOC creates a situation wherein they touch the target, attempting to create a more personal bond. The PIOC will carefully plan and execute touching, which may or may not be sexual in nature. The touch may appear to be accidental, with the PIOC apologizing profusely. If tolerated by the target, the touching will grow more frequent, prolonged and invasive, and will likely occur when others are not observing. Examples include:</p> <ul style="list-style-type: none"> • A handshake (prolonged/repeated) • Pat on the back/shoulder • Flicking dirt from clothing • Straightening the collar • “Accidental” bumping into or brushing up against the target
11	<p><u>The Rumor Clinic</u></p> <p>The “We/They” step was designed to affect the target’s feelings, pulling them away from others. The Rumor Clinic is designed to further isolate the target by negatively affecting others’ feelings about the target.</p> <p>A well-placed rumor is usually initiated in a way that deflects attention away from the manipulator. The rumor builds strength circulating among others, who may withdraw from the target. The target feels further isolated and strengthens the bond with the PIOC.</p>
<p>Turnouts (Steps 12-14) - PIOC compromises target & advises they are in real trouble</p> <ul style="list-style-type: none"> • Thus far, rule infractions have been minor. • The PIOC has implemented steps 1-11 without being detected. • Before proceeding, the PIOC will analyze whether the target can be compromised. • Next steps will result in serious rule violations or even breaking the law. 	
12	<p><u>The Shopping List</u></p> <p>The PIOC becomes overt and makes demands which expose their true intentions. They have created a situation where refusal is difficult. The PIOC’s “Shopping List” may include contraband items, but could also encompass sexual favors. The target only now discovers they’ve been compromised.</p>
13	<p><u>The Lever</u></p> <p>A lever pries or forces an object to respond through the proper distribution of pressure. If the PIOC turners have properly executed the Set-Up, the right distribution of pressure has been applied to the target. The PIOC manipulator threatens to expose the target’s indiscretion.</p> <p>Targets usually believe it is a one-time request. But this is rarely, if ever, a one-time request. PIOC demands will escalate.</p>
14	<p><u>The Sting</u></p> <p>The sting wraps up all the steps in the Set-Up. The target now has a choice to make: comply with the demand or suffer the consequences. Whether or not the target complies with the demands, when the PIOC feels the target is no longer useful, the PIOC may still expose the indiscretion.</p>

Addendum #8 offers some clues you may be the target of a set-up within some of the steps. Periodically review and discuss professional boundaries questions with your Staff Advisor.

Remember – it’s never too late to stop The Sting!

Avoidance Strategies - Protecting Yourself from the Set-Up

There are some tips you can follow to be better prepared for a PIOC set-up.

- Professionalism – respect your environment and never become unduly familiar with the PIOC. Maintain *professional boundaries*!
- Recognition Training – learn the techniques used by PIOC in the Set-Up process.
- Communication Monitoring – remember that what you say and how you say it is constantly being monitored by the PIOC.
- Procedural Knowledge – know the rules and regulations in this handbook.
- Confident Command – be firm, fair, consistent, and objective in your contact with PIOC.
- Chain of Command – keep your chain of command informed of situations, questions, and problems.

*If you suspect you – or others – are being targeted for a Set-Up,
report the actions of the PIOC immediately.
Help one another stay safe!*

Summary

Psychological manipulation occurs every day in correctional facilities. Each Non-DOC Personnel must consciously determine not to fall prey to the “Set-Up” game. Without targets, PIOC ignore the game and move on to other things – hopefully prosocial activities. But when they find a vulnerable target, the temptation to play the game becomes too great for some PIOC to resist.

The game is subtle and hard to perceive. When they feel something is not quite right, Non-DOC Personnel can withdraw from the game. If you follow the policies, procedures and guidelines for self-evaluation, you effectively shut down the Set-Up, thereby encouraging PIOC to focus on rehabilitation efforts.

Security is critical, though not always convenient...

- The volume of rules can be overwhelming.
- Rules are established for specific reasons, which may not be apparent.
- Ask questions of staff members if you are unsure.
- Request copies of policies if you need further clarification.
- The goal is for everyone to walk out of the facility safely!
- The best practice is to be – firm, fair and consistent.

While not every PIOC will be manipulative, it’s extremely important that Non-DOC Personnel recognize that it will be impossible to differentiate an individual who is sincere from one who is manipulative. The risk of becoming a target increases when you assume that you can ‘read’ people and will know if someone is trying to manipulate you.

TERMINATION/SUSPENSION/REVOCATION OF FACILITY ENTRY PRIVILEGES

A program/service/activity may be terminated in any instance where the safe and controlled functioning of the facility might be affected. This may occur because a Non-DOC Personnel has violated facility procedures or rules. Or it may result from

circumstances in a separate area of the facility (e.g. disturbance/lockdown). In emergency circumstances, staff may be unable to share information with the Non-DOC Personnel in the moment. In this case, a Staff Advisor or Facility Non-DOC Personnel Coordinator can provide further instruction within a few days.

Facility entry privileges may also be temporarily suspended pending investigation. Any suspension will be documented via an incident report. The Non-DOC Personnel will receive a letter, explaining that suspension prohibits entry at all DAI facilities until the investigation has concluded. If a rule violation or other problem is verified, the DAI Administrator has the right to permanently revoke facility entry privileges at all DOC facilities. Addendum #9 gives real-life examples of situations that caused Non-DOC Personnel to temporarily or permanently lose facility entry privileges.

Please remember you are held to the same standards as employees regarding your professional conduct with PIOC. The following are examples of violations that may result in suspension or revocation (not exhaustive):

- Failure to follow facility rules or regulations, especially those covered in this manual
- Failure to provide programming and/or activities agreed upon with the facility
- Participation in or encouraging activities that are determined to be a threat to the security of the facility
- Fraternization or violating professional boundaries is the most common problem with Non-DOC Personnel behaviors.
 - Using facility entry privileges, programs or activities to carry on personal relationships with PIOC.
 - Non-DOC Personnel cannot have personal visits with any PIOC at the facility where you are providing programming and/or activities.
 - **You may provide professional services or you may visit a PIOC, but you cannot do both.**

Also be mindful of the following state laws and policies which would constitute serious rule violations or even criminal acts.

- ***Wisconsin Statutes, Section 302.095 (2) - Delivering articles to PIOC.***
Prohibits delivery of any article to any PIOC, depositing or concealing an article within a correctional facility or its boundaries or receiving an article to convey out of the facility that is contrary to the rules or without the knowledge/permission of the Warden. Any person found in violation may be guilty of a class I felony.
- ***Wisconsin Statutes, Section 946.44 - Assisting or permitting escape.***
Any person intentionally enabling or aiding any PIOC to escape from DOC custody may be guilty of a class H felony. Any person who intentionally introduces a loaded or unloaded firearm, or any similar article may be guilty of a Class F felony.
- ***Wisconsin Statutes, Section 961.49 - Offenses involving intent to deliver or distribute a controlled substance on or near certain places.***
& Section 961.495 - Possession or attempted possession of a controlled substance on or near certain places.
Prohibits the possession, delivery or distribution of any illegal drug or controlled substance within 1000 feet of a correctional facility. Conviction of possession or intent

to deliver may result in an imprisonment sentence increased by 5 years due to proximity to a correctional facility.

FACILITY LOGISTICS

DAI Policy 309.06.01 – Visiting

Non-DOC Personnel must abide by all facility policies and procedures to assist staff with maintaining orderly facility operations.

ENTRANCE PROCEDURES

Search of Visitors (DOC Administrative Code 306.18)

Upon facility entry and exit, both you and your vehicle may be subject to search. This may include the use of a metal detector, pat search, visual inspection and/or a trained canine. These are all typical correctional procedures.

Anyone unwilling to allow a search will be asked to leave the property and your continued participation as a Non-DOC Personnel may be affected.

Parking Lot (DOC Website - Visiting Procedures)

- Vehicles must be secured (windows rolled up, doors locked).
- No loitering or horseplay in the parking lot area.
- No one is allowed to remain on state property to wait for other persons. Anyone denied entrance must leave state property immediately.
- Pets may not be left unattended in vehicles on state property.
- Yelling, waving, sounding vehicle horns or blinking headlights to signal PIOC is strictly prohibited.
- Disabled/stalled vehicles must be reported; vehicles must be attended to and/or removed as soon as possible. Vehicles left on state property for over 48 hours will be towed at the owner's expense.
- Tobacco use is not allowed anywhere on state property including the parking lot. Visitors will be expected to extinguish cigars/cigarettes and halt other tobacco use before entering the lot. *WI ss 101.123 (2) (a) 5m.*

Please note: PIOC workers may be present in the parking lot; please do not leave mail, For Sale signs with phone numbers, or other personal identifying information visible in vehicles.

Entry

Upon arrival, you will be asked to provide valid photo identification and sign a visitor log. Valid photo identification includes a current driver's license or state identification card, tribal ID card or passport. Individual entry may be denied for persons who cannot produce sufficient identification or whose purpose for entry may be suspect.

Non-DOC Personnel will be required to wear a "visitor badge" prepared by lobby staff

or their DOC-issued photo-ID badge which is kept in the lobby between visits (*Executive Directive 63 – DOC Photo Identification Cards*). Some facilities may issue a personal alarm while in the facility.

Attire

Non-DOC Personnel are expected to dress appropriately (for your own safety and security). You will not be allowed to enter a facility wearing prohibited attire.

<i>Policy prohibits the following:</i>	
GENERAL	
<ul style="list-style-type: none"> • Internet “smart” technology and electronic recording equipment in any form is prohibited • Transparent/translucent clothing • Spandex- or Lycra-style clothing. Tights or leggings of this material may be worn under attire of appropriate length as identified below • Exposed undergarments • Clothing with revealing holes, tears or slits • Clothing or accessories with obscene or profane writing, images or pictures • Gang-related clothing, headwear, shoes, logos or insignias • Any clothing that may have the potential to cause undue attention 	
UPPER BODY	LOWER BODY
<ul style="list-style-type: none"> • Tops and dresses that are strapless, tube or halter style • Tops and dresses that expose the midriff (front and/or back) • Camisoles and tank tops are only permissible when worn under other attire • Underwire bras that interfere with successful metal detector pass 	<ul style="list-style-type: none"> • Shorts that are shorter than fingertip length with the visitor standing with proper posture, arms straight down, fingers extended • Skirts and dresses shorter than fingertip length plus three inches with the visitor standing with proper posture, arms straight down, fingers extended • Sandals, open-toed footwear or clogs without a heel strap in place
HEADWEAR	
<p>Headwear is permitted, provided it does not conceal identity and allows facility staff to verify visitor identity</p> <ul style="list-style-type: none"> • Non-religious headwear must be removed for inspection prior to passing through the metal detector • Visitors wearing religious headwear that conceals identity must allow same-gender facility staff to view their face(s) to verify identity upon facility entry and exit. After identification, the visitor shall be permitted to replace the facial covering. 	

Metal Detector (DAI Policies 306.00.36 Entrance Procedures & 309.06.01 Visiting)

Non-DOC Personnel must pass through and clear the metal detector (maximum of three attempts) each time you enter a facility. Please avoid wearing excessive jewelry or clothing with metal attached (i.e. large metal buckles, snaps, or buttons, bib overalls, underwire bras, etc.) Coats/outerwear and shoes/boots must be removed. After clearing the metal detector, the visitor will be allowed to replace the garment/shoes and proceed into the facility.

Special Accommodations (DAI Policy 309.06.02 – Visitor Entrance – Special Needs)

Anyone requiring special accommodations due to a disability or temporary medical issue must submit a Visitor Requesting Accommodation form (DOC-2424). This may include medical implants or appliances which do not clear the metal detector, wheelchair, cane, crutches, Bledsoe boot, brace, etc. The form must be completed by a licensed physician and be approved by the facility prior to entrance (please allow at least a week for

processing). Once verified, the form will be maintained on file for all future visits and can be accessed by other DAI facilities, as needed.

Personal Items (DAI Policies 309.06.01 Visiting & 300.00.58 – Staff Personal Property)

All personal property is searched upon facility entrance and exit by x-ray machine and/or visual inspection. Non-DOC Personnel may be asked to empty pockets.

Allowable with Prior Approval	Prohibited
<ul style="list-style-type: none">• Required medications (e.g. inhalers, nitro pills, epi-pens). Some facility procedures require such items to remain under staff control.• Pens/paper/notebooks• Program materials• Religious texts/publications	<ul style="list-style-type: none">• Cameras• Cell phones• Electronic/computer equipment• Any recording device• Bags/purses

Lockers are provided for personal items which cannot enter the facility (**turn off phone/ringer**). You may be required to put wallets, credit cards, money and/or keys into the locker, per facility procedure. Such items are not needed and could create serious security problems if lost.

Weapons are prohibited in all facilities per ***DAI Policy 300.00.60 – Carrying a Concealed Weapon***. Persons licensed to carry a weapon must secure it in either the trunk or another locked compartment of their vehicle in the parking lot.

Program Materials

All program materials must be pre-approved. This includes, but is not limited to: writing materials, handouts, videos, CD's, and books. Your Staff Advisor will arrange for security review prior to facility entrance. Due to increasing trends of drug contraband entering facilities via paper materials and mail, enhanced screening procedures have been implemented. Please review Addendum #10 for further guidelines.

Distribution of any materials to PIOC must be pre-approved by the Staff Advisor and security.

DO NOT give anything directly to any PIOC.

Pre-approved handouts should be distributed by staff, or – if allowed – may be stacked on a table for the group. This avoids any perception of fraternization.

Program Location

Depending on facility procedure, you may or may not be escorted within the facility. In either case, go directly to your assigned area. Room assignments may change depending upon the need of the facility.

- Do not move from your assigned area without authorization. In an emergency, correctional staff will expect you to be in your assigned area.
- Ask about the location and procedure for restroom use (may be locked) prior to the start of your activity/program.

- Notify a staff member prior to leaving your area.
- Notify a staff member of the completion of your program/service/activity.

Discuss facility procedures, along with any questions or concerns with your Staff Advisor or available security staff.

Exit

When leaving the facility, your possessions may be inspected or inventoried. Sign-out on the visitor log, turn in your identification badge and any equipment assigned to you (e.g. personal alarm). Remove all personal items from the locker. If you fail to return DOC property, you will be contacted and asked to immediately return these items.

Discuss any questions with your Staff Advisor.

PIOC COUNTS & MOVEMENT

Per policy, official PIOC counts are conducted at predetermined times, some of which may occur when Non-DOC Personnel are in the facility. Once count begins, there is no PIOC movement.

Emergency counts are taken at unscheduled times for any number of reasons. When a count is announced, Non-DOC Personnel must adhere to the procedures of that facility. Non-DOC Personnel movement may also be restricted and no one is permitted to enter or leave the facility.

PIOC generally move at pre-determined times in groups between facility locations (e.g. school, programs, work, etc.). PIOC who “just stop by for a minute” may be in violation of a rule; be aware of the particular procedure at each facility.

Per policy, all PIOC are issued a photo identification card worn on a lanyard. This must be visible at all times.

EMERGENCY PROCEDURES

You will be informed of emergency procedures specific to each facility during orientation. Ask questions! If you are uncertain about anything - don't wait until an emergency arises.

Staff members are trained to respond to emergencies such as fires, medical issues, fights, riots, escapes, suicide attempts, disturbances, etc. Non-DOC Personnel must not interfere with emergency procedures.

Be aware that an emergency may be staged by PIOC to divert attention from an escape or other type of disturbance. Employ extra caution at all times.

In the event of an emergency, be sure to notify the nearest correctional staff member of your presence and wait for instructions.

Always follow staff instructions. Be prepared to act quickly.

Fire/Building Evacuation

Become familiar with the facility procedures and evacuation routes for the room/building in which you are located.

Inclement Weather/Tornado Procedures

PIOC movement may be restricted and programs cancelled in the event of snowfall, fog, storms, etc. If severe weather/fog is predicted, contact the facility prior to travel.

Notify the facility of need for cancellation if travel conditions may be hazardous. Your safety is a priority.

Medical Emergency

If you become aware of anyone in medical distress, always notify staff immediately to facilitate efficient response (also due to possible set-ups, the potential for litigation, etc.). Even if you have been trained in CPR/AED or First Aid, you must first notify correctional staff before attempting to perform lifesaving measures on a PIOC. Staff is aware of the location of protective and life-saving equipment. Follow all staff member instructions as rapidly as possible.

Disturbance/Hostage Situation

If a disturbance were to occur, every effort will be made to ensure your safety. However, in the event that a Non-DOC Personnel or staff member is held hostage, it is the policy of the Wisconsin Department of Corrections not to accede to PIOC demands.

In General...

- Be aware that your program/activity/event may be cancelled without notice if an emergency or urgent situation arises anywhere within the facility.
- You must immediately follow the staff instructions.
- Please refrain from asking questions until the situation is under control and the facility has returned to normal operations.
- Facility entry and exit may be temporarily prohibited during an emergency.

Serve as an example for PIOC in following directions and refraining from interrupting or distracting staff.

DOC WORK RULES

Executive Directive 43 (Addendum #11)

Most employers have employee behavior expectations, similar to the DOC work rules. Non-DOC Personnel are held to the same standard of conduct as DOC employees. A list of prohibited behaviors and activities is attached to this manual for your reference. These work rules enable DOC to carry out its mission and ensure the public's confidence.

CONFIDENTIALITY OF SPECIFIC INFORMATION

Executive Directive 35 – PIOC Health Information

Wisconsin and federal laws protect the confidentiality of all protected health information (PHI). All DOC staff are trained to follow confidentiality laws. DOC employees and Non-DOC Personnel must NOT disclose any PIOC PHI unless legally authorized to do so.

Health information includes any verbal, written or electronic information about any past, present or future health condition and treatment (e.g. medical, dental, mental health and/or alcohol or other drug abuse diagnoses and treatment). Some DAI facilities, or some locations within a facility, are defined as treatment sites. All PIOC housed at that site have a treatment need; therefore, the PIOC's mere placement at that site is PHI and must be treated as confidential. In other words, do not disclose or acknowledge that [PIOC Name] is placed at that facility.

You may become aware of PIOC PHI during your facility activities. Do not discuss PIOC PHI with anyone either within or outside of the facility, including any health information the PIOC may reveal to you. Do NOT ask any employee or PIOC for health information. Inform the Facility Non-DOC Personnel Coordinator if you learn of PHI from any source other than the PIOC, so that DOC staff may investigate the potential disclosure and take corrective action as needed.

Ask your Facility Non-DOC Personnel Coordinator for any questions about PHI. The DOC HIPAA Compliance Officer may be consulted, as needed.

Executive Directive 76 – Criminal History Record Information

DOC has a responsibility under federal security regulations to protect criminal history record information (CHRI) by fingerprinting all persons who have access to this data. Facility logistics may permit access to areas or computer systems where CHRI information is maintained, viewed, stored or otherwise used. Non-DOC Personnel may be asked to participate in fingerprinting based upon specific duties and facility access.

When Confidentiality Does Not Apply

Notify staff **immediately** if you become aware of:

- Overt/covert threats or harm to self or others
- Alleged sexual assault, sexual activity or sexual intimidation between any PIOC and any other person
- Plans to riot or escape
- Possession of drugs or weapons
- Suspicious or unexplained deaths (homicides, suicides)
- Impending criminal activities, including delivery of contraband to any PIOC

- Previously undisclosed crimes which may impact safety of a facility, community corrections operations and/or the public (e.g. homicide, attempted homicide, sexual assault, battery, domestic violence)

Please note: This also applies to information shared during religious programming and pastoral visits.

**Timely disclosure of these serious security issues
helps keep everyone safe!**

COMMUNICABLE DISEASE PREVENTION

DAI Policy 500.60.01 – Infection Prevention and Control Program

In the event of communicable disease, health staff may determine it is not medically safe for the PIOC to have contact with other people (e.g. other PIOC, staff, Non-DOC Personnel, PIOC personal visitors). Such steps may be needed to protect the PIOC's condition, or to prevent the spread of communicable disease to others. In other cases, visits may proceed safely with certain precautions.

Because of confidentiality laws, DOC will not inform Non-DOC Personnel about any PIOC's medical condition(s). You may encounter situations related to public health issues, such as:

- A notice may be posted near the facility entrance to indicate that a communicable disease (e.g., influenza, chicken pox, rubella) has been diagnosed within the facility.
- You may observe certain health precautions (e.g. bandage, respiratory mask) taken to protect the PIOC and others from infection.
- Your appointment may be cancelled with or without advance notice.

If you have concerns about exposure, you may wish to postpone or cancel your visit for that day. Likewise, if you have symptoms of a communicable disease (e.g. fever, cough, rash), please postpone or cancel your visit for the protection of all PIOC and staff.

Universal precautions (e.g. frequent hand washing, avoiding contact with blood or bodily fluids, etc.) are advised at all times. Refer to Addendum #12 - *POC-40 Infection Control Hand Hygiene* and Addendum #13 - *POC-40C Infection Control Standard Precautions* at the end of this manual.

EMPLOYEE HARASSMENT AND DISCRIMINATION

Executive Directive 5

The Wisconsin DOC prohibits workplace harassment/bullying and ensures that Department employees and Non-DOC Personnel work in an atmosphere free from such.

All employees and Non-DOC Personnel are prohibited from engaging in harassment, hazing, or bullying. All allegations and incidents of harassment, bullying or threatened

violence must be reported, reviewed and treated in a serious manner. Such reports will remain confidential unless disclosure becomes necessary. This policy does not apply to PIOC violence, which is addressed by other DOC policies.

Non-DOC Personnel who become aware of any harassment or bullying must report to the Facility Non-DOC Personnel Coordinator or Shift Supervisor as soon as possible.

DRUG-FREE WORKPLACE

Executive Directive 41

DOC maintains a drug-free workforce to promote health, safety and security. Employees, contractors and Non-DOC Personnel are prohibited from the following while on duty: 1) possessing a controlled substance without a prescription; 2) showing signs of having consumed alcohol or illegal drugs; 3) reporting to work in an impaired condition; and 4) engaging in activities which may impair judgement or ability to perform duties.

USE OF DOC INFORMATION TECHNOLOGY RESOURCES

Executive Directive 50

The vast majority of Non-DOC Personnel will not be given email, internet and computer access. There may be some unique situations, though, in which a you would use DOC Information Technology (IT). In such cases, Non-DOC Personnel adhere to the same expectations as DOC staff members on the appropriate use of IT resources. Further information and training would be provided at the time IT access is granted.

CLOSING COMMENTS

Thank you for your interest in providing programming and/or activities to PIOC in the Wisconsin DOC institutions and centers. DOC could not carry out its mission of protecting the public without the dedication of thousands of Wisconsin citizens committed to offender rehabilitation and reducing crime victimization. We hope this orientation manual gives you a foundation for understanding the prison structure, positive aspects of many programs and functions, as well as potential pitfalls to avoid.

Whether your role is religious programming, education, job training, recreation, self-help support groups or restorative justice, your work will be of great importance in the lives of PIOC. When these offenders return to our communities, the information you impart, the skills you teach, and the sense of purpose and belonging you engender will also benefit their families, victims, neighbors, coworkers and the broader community.

Thank you for providing professional services in DOC facilities. Be safe!

ADDENDUMS

1. Glossary of Acronyms
2. DAI Policy 309.06.03 – Attachment A – Non-DOC Personnel, Business & Professional Visitors – Category, Training & Status Matrix (8/20/24)
3. Non-DOC Personnel Reporting – Quick Reference
4. DAI Policy 309.61.01 – Attachment: Congregate Religious Event Conduct (1/22/19)
5. POC-54 - Preventing Sexual Misconduct and Harassment – A Guide for Correctional Staff, Contractors and Volunteers (9/2023)
6. DAI Position Regarding Non-DOC Personnel Material Support to PIOC
7. DOC-2270A - Fraternization Policy Exception Request (6/2016)
8. Am I a Target of “The Sting”? – Review of Professional Boundaries
9. Situations Resulting in Loss of Facility Entry Privileges
10. New Procedures for Inspecting Religious Material Donations & Mail (4/6/22)
11. Executive Directive 43 – Work Rules (8/3/2022)
12. POC-40 - Infection Control – Hand Hygiene (11/2005)
13. POC-40C - Infection Control – Standard Precautions (12/2013)

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GLOSSARY OF ACRONYMS

A&E	Assessment & Evaluation (intake)
ABE	Adult Basic Education
AODA	Alcohol & Other Drug Abuse (now identified as SUD)
ATR	Alternative to Revocation (for community corrections violations)
BOCM	Bureau of Offender Classification & Movement
BSI/BCE	Badger State Industries/Bureau of Correctional Enterprises
CO	Correctional Officer
CCAP	Circuit Court Access Program
CCE	Correctional Complaint Examiner (appeal to Secretary's office)
CCEP	Community Corrections Employment Program
CIP	Challenge Incarceration Program
DS	Disciplinary Separation
DV	Domestic Violence
ED	Executive Directive (DOC-wide policies)
ERP	Earned Release Program
ES	Extended Supervision
GD	Gender Dysphoria (may be correlated with Transgender)
GED	General Education Diploma/Graduate Equivalency Diploma
GP	General Population
HSED	High School Equivalency Diploma
HSU	Health Service Unit
ICE	Institution Complaint Examiner
INVUNA	Involuntarily Unassigned (PIOC without institution job)
IR	Incident Report
JOC	Judgement of Conviction (court document)
MD	Maximum Discharge
MR	Mandatory Release
NGI/NGRI	Not Guilty by Reason of Mental Disease or Defect (formerly insanity)
OBS	Observation
OVSP	Office of Victim Services & Programs
PC	Parole Commission
PED	Parole Eligible Date
PIOC	Person(s) in Our Care
PMR	Presumptive Mandatory Release
PO	Probation/Parole Officer or Community Corrections Agent
PRC	Program Review Committee (now identified as Classification)
PSU	Psychological Services Unit
RH/RHU	Restrictive Housing Unit (formerly SEG)
RRS	Risk Reduction Sentence
SEG	Segregation Unit (now identified as RH/RHU)

Addendum 1

SORP	Sex Offender Registry Program
SOT	Sex Offender Treatment
SRSTC	Sand Ridge Secure Treatment Facility (DHS facility)
STG	Security Threat Group (gangs and hate groups)
SUD	Substance Use Disorders (formerly AODA)
T4C	Thinking for a Change
TIS	Truth-in-Sentencing
TLU	Temporary Lockup
UA	Urinalysis
VUNA	Voluntarily Unassigned (PIOC without institution job)
WCCS	Wisconsin Correctional Center System (male facilities) <ul style="list-style-type: none"> • BRCC – Black River Correctional Center • DACC – Drug Abuse Correctional Center • FCCC – Felmers Chaney Correctional Center • FCC – Flambeau Correctional Center • GCC – Gordon Correctional Center • JBCC – John Burke Correctional Center • KCC – Kenosha Correctional Center • MSCC – Marshall Sherrer Correctional Center • MCC – McNaughton Correctional Center • OCC – Oregon Correctional Center • SPCC – Sanger Powers Correctional Center • SCCC – St. Croix Correctional Center • TCC – Thompson Correctional Center • WCC – Winnebago Correctional Center
WRC	Wisconsin Resource Center (DHS facility)
WWCS	Wisconsin Women's Correctional System <ul style="list-style-type: none"> • TCI – Taycheedah Correctional Institution (max/med security) • MWCC – Milwaukee Women's Correctional Center • REECC – Robert E. Ellsworth Correctional Center

Addendum 2

DAI Policy 309.06.03 – Non-DOC Personnel, Business & Professional Visitors
Attachment A – Category, Training & Status Matrix
 Effective – 08/20/24

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Non-DOC Personnel, Business & Professional Visitor (hereafter Non-DOC Personnel) – Any individual approved to enter DAI facilities for a specified purpose who is not a DOC staff member or PIOC personal visitor.

NOTE: For purposes of this policy, individuals who undergo NETS orientation or other applicable new employee training through human resources procedures are equivalent to employees, and therefore are not identified as “Non-DOC Personnel” (e.g. Doctoral Internship in Health Service Psychology, HSU contract staff, selected Reentry Unit and OPS contractors).

Facilities shall require all Non-DOC Personnel to submit DOC-2674 and complete background checks consistent with DAI 300.00.92 (except some Legal Services and Law Enforcement/Local First Responders as specified below). DAI Security Chief may authorize DAI-wide applications to be processed within DAI Central Office (see Attachment B for further DOC-2674 instructions).

The charts below indicate typical staff supervision of each role, minimum required training, whether fingerprint-based background check and photo ID badges are required, and location of records (see Attachment B for further details). NOTE: When multiple training tier options are indicated for a category, Warden/designee shall assess appropriate needs case-by-case and may require training beyond minimum expectations.

Category	Definition	Supervision/Subject Matter Experts for Supplemental Training	Training Level	Fingerprinting & DOC Photo ID Badges	Records Location
Volunteer	Individual approved to facilitate congregate or individual program/service/activity directly with PIOC (e.g. religious worship/study, self-help support group, literacy tutor, recreation).	Chaplain; CPS; Education Director; etc.	2 or 3	Tier 2 – No; Tier 3 – Yes	Volunteer
Pastoral Visitor	A religious care provider/clergy delivering 1-1 spiritual counseling to PIOC per DAI Policy 309.61.01 (i.e. one-time visit and/or multiple ongoing sessions). NOTE: 1-1 professional visits shall be tracked in WICS, as detailed in Section II.C.	Chaplain/designee	2 or 3	Tier 2 – No; Tier 3 – Yes	Volunteer
Guest Speaker/ Performance/ Program Guest	Individual providing a single or time-limited program/service/activity for PIOC (e.g. concert, employment/reentry fair, graduation ceremony, special event). NOTE: Escort and/or limit PIOC contact.	Staff supervising correlated event	1 or 2	No	Volunteer
Student/ Intern	A college/university student approved to take classes alongside PIOC, or work with a staff member for the purpose of professional training within an accredited educational program (e.g. Practicum; Student in Field Placement). See DOC-310.	Facility supervisor correlated with professional training	2 – students taking classes with PIOC remotely; 3 and/or 4 – students taking classes with PIOC within DAI facility; students in professional practicum	Tier 2 – No; Tier 3/4 – Yes	Volunteer
Facility Vendor	For purposes of this policy, employees from an external agency with which DOC has established a business relationship to provide certain services to the institution as a whole (e.g. construction, deliveries, equipment/facility repair, laboratory, sanitation). NOTE: Security Director/designee may require staff escort and/or limit PIOC contact case-by-case.	Business office; building maintenance; food service; HSU; Security Director, etc.	1	No	Business Visitor

Addendum 2

DAI Policy 309.06.03 – Non-DOC Personnel, Business & Professional Visitors
Attachment A – Category, Training & Status Matrix
Effective – 08/20/24

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Category	Definition	Supervision/Subject Matter Experts for Supplemental Training	Training Level	Fingerprinting & DOC Photo ID Badges	Records Location
Program Contractor	A staff member or representative of a private organization with which the DOC has established an agreement, and whose job duties include provision of direct services to PIOC. The contract or MOU defines the scope of professional services to be provided prior to and/or following discharge from custody (e.g. case management, disabilities advocacy, education, employment support, legal assistance, peer support, veteran services).	Reentry Unit; Office of Program Services (OPS); correlated facility staff; etc.	2 – online only teachers; 3 and/or 4 –based on role	Tier 2 – No; Tier 3/ 4 – Yes	Business Visitor
Other County, State or Federal Agency	Subcategories: <ul style="list-style-type: none"> Representative of Dept. of Health Services (DHS), Workforce Development (DWD) or Veterans Affairs (DVA) providing direct services to PIOC (i.e. equivalent to Program Contractor). Regulatory Agency/Inspector/Auditor carrying out business functions with DOC and/or facility (e.g. NIC, PREA audit). <p>NOTE: Security Director/designee may require staff escort and/or limit PIOC contact case-by-case.</p>	Reentry Unit; Office of Program Services (OPS); correlated facility staff; etc.	1 – single regulatory visit; 2 – multiple regulatory visits (may be waived case-by-case); 3 – PIOC service providers	Tier 1 – No; Tier 2 – No; Tier 3 – Yes	Business Visitor
Secure Offender Transport Services	Employees from an external agency with which DOC or law enforcement has established a business relationship for secure transport of PIOC. Agency provides employee roster with photographs – posted to MyDOC. NOTE: Consistent with DAI policy 325.00.05, PIOC shall only be released to external custody with pre-arrangement confirmed by designated facility staff; and after ID verification with agency roster.	DAI Security Chief, Security Director, Records Supervisor, etc.	4 – specialized security training by contracted transport agency	No – Must Produce External Agency ID for Verification	Business Visitor
Employee Trainer	Individual presenting training to employees who has no contact or unsupervised interaction with PIOC. NOTE: Escort and/or limit PIOC contact.	Corrections Training Center (CTC); facility training supervisor; DAI committee; etc.	1	No	Business Visitor
Special Event/ Tour Group	Non-DOC Government Officials (e.g. elected official, judicial staff, legislative staff) participating in official visit or tour; members of public approved to enter facility for official tour/visit as part of community relations or educational opportunities (e.g. university class, staff friends & family day). NOTE: Escort and/or limit PIOC contact.	Staff supervising correlated event	1	No	Business Visitor

Addendum 2

DAI Policy 309.06.03 – Non-DOC Personnel, Business & Professional Visitors
Attachment A – Category, Training & Status Matrix
Effective – 08/20/24

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Category	Definition	Supervision/Subject Matter Experts for Supplemental Training	Training Level	Fingerprinting & DOC Photo ID Badges	Records Location
Legal Services	<p>Individual or group providing legal representation or services to incarcerated population.</p> <p>The following are exempt from background check and training requirements; not required to submit DOC-2674:</p> <ul style="list-style-type: none"> Licensed attorneys verified by the State Bar of Wisconsin Court officials, court reporters and court staff with verified identification card Employees of the State Public Defender with verified identification card <p>Licensed attorneys with whom DOC has a <u>contractor/vendor relationship</u> (e.g. Remington Center, Disability Rights Wisconsin, Reentry Legal Services) are exempt from background check requirements, but <u>must complete PREA training via DOC-2674 submission; filed for audit purposes only.</u></p> <p>Non-attorney legal services personnel (e.g. paralegals, investigators, etc.) shall undergo background check and level 1 PREA training via DOC-2674 submission (excluding court and State Public Defender employees as cited above).</p> <p>NOTE: Regardless of cited exemptions, all 1-1 professional visits shall be tracked in WICS, as detailed in Section II.C.</p>	Office of Legal Counsel; Reentry Unit; DAI Remington Center Liaison; etc.	1 – non-attorney personnel; 4 – law students	No	Business Visitor (as applicable)
Law Enforcement/ Local First Responders	<p>Sworn or badged officers of a government agency (e.g. city, county, state, federal) responsible for prevention, investigation and enforcement of criminal laws. Official business within DOC sites may include evidence gathering, interviewing PIOC or staff, etc.</p> <p>Emergency services personnel (e.g. ambulance/EMT, fire fighter) entering facilities on an emergency basis or for preparedness, planning or training (e.g. fire inspections, table-top exercises).</p> <p>NOTE: 1-1 professional visits shall be tracked in WICS, as detailed in Section II.C.</p>	Security Director/designee, Warden, Deputy Warden, DAI Security Chief	Not Applicable	No – Must Produce Badge &/or Photo ID for Verification	not applicable; no DOC-2674; no SharePoint record

Addendum 2

DAI Policy 309.06.03 – Non-DOC Personnel, Business & Professional Visitors
Attachment A – Category, Training & Status Matrix
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TRAINING LEVEL	ORIENTATION/TRAINING REQUIREMENTS BY TIER (Orientation requirements below establish minimum DAI expectations; facilities may require additional training based upon individual role, level of PIOC contact, frequency of facility entry, etc.)
1	Persons entering facilities on a short-term, escorted basis and not having direct contact or unsupervised contact with PIOC; also licensed attorneys. POC-0054 as incorporated into DOC-2674 fulfills minimum PREA training requirements for all tiers.
2	Persons entering all DAI facilities 1-4 times per year; may have limited, supervised PIOC contact. POC-0080 brief training is required.
3	Persons entering all DAI facilities 5-or-more times per year; may have 1-1 PIOC contact or unsupervised PIOC contact (i.e. consistent with facility procedures). POC-0079 full training is required.
4	Persons providing contracted professional services directly with PIOC, and needing supplemental training targeted to their specific role; may also include some students/interns. Training requirements are identified by correlated DAI subject matter experts (e.g. Education Director, Security Chief, etc.); level 4 training may be provided by external organization as detailed by contract/MOU (e.g. Remington Center, Inside/Out College; secure transport agency).

FACILITY ENTRY STATUS (Determination of Non-DOC Personnel's approval/readiness to enter DAI facilities and provide program/service/activity)	
GOOD STANDING	Active – Orientation is up-to-date; available for scheduling NOTE: May be inactive at specific site(s) due to unique situation (e.g. family member incarcerated at site; conflict of interest or prior incarceration at site); staff shall detail reasons in SharePoint comments field
	Inactive – Not currently available for scheduling due to (not exhaustive – staff shall detail reasons in SharePoint comments field): <ul style="list-style-type: none"> DOC-2674 in progress (e.g. pending background check/approval) Orientation update required Personal choice (e.g. medical, travel) DOC-2674 Not Processed – No Fault (e.g. withdrawn, event cancelled, facility volunteer needs met); NOTE: indicate application not processed & file in group folders in case of future activation
REVIEW STATUS OR DENIED APPLICATION	<p>New applicant or previously approved Non-DOC Personnel with history of resolved or unresolved rule-violations/issues/concerns:</p> <ul style="list-style-type: none"> Facility entry privileges may be withheld during procedures specified in Section VIII. If facility entry privileges are approved, active/inactive status may be site-specific. <p>Staff shall detail reasons in SharePoint comments field:</p> <ul style="list-style-type: none"> Temporary Suspension of Privileges Pending Investigation (applies to all DAI facilities during investigation) Reinstatement Following Investigation NOTE: active status resumed (may be site-specific) Revocation of Facility Entry Privileges (applies to all DAI facilities) Approval Following Revocation & Reapplication NOTE: active status resumed (may be site-specific and/or conditional) Denied Application (e.g. background check; inappropriate/ineligible applicant)

Addendum 3

NON-DOC PERSONNEL REPORTING – QUICK REFERENCE

This list is not all-inclusive, but should offer insights regarding urgency of certain issues. Please see relevant sections of manual for detailed instructions. When possible follow chain-of-command by starting with your Staff Advisor. During weekends or off-hours, however, it may be necessary to provide notice to any available staff member. This allows for timely staff follow-up, as necessary.

Remember – some issues must be reported to a staff member immediately. You must notify staff of any allegations of sexual abuse/assault/activity, impending violence, self-harm, contraband or escape plans. Sharing timely information about these urgent safety and security issues may event prevent serious crimes or victimization. Periodically review this chart so you can quickly recall situations that rise to this level and must be disclosed – **before leaving the facility**.

WHAT	WHEN	WHO	HOW
ABSENCE			
Less than 48-hours notice	Immediately	Any Available Staff Member	Phone – <u>do not leave voice message</u> ; speak to on-duty staff
Planned with more than 48-hours notice	As Soon As Practical	Staff Advisor	Phone or email; on holidays/weekends or if you receive staff out-of-office message, follow chain-of-command to speak with on-duty staff by phone
PERSONAL SITUATION			
You have contact with law enforcement or criminal court (non-DOC)	By Next Business Day	Staff Advisor or Facility Non-DOC Personnel Coordinator	Phone – <u>do not leave voice message</u> ; speak to on-duty staff; follow-up with phone or email contact to Staff Advisor
You develop a medical or physical condition which may necessitate accommodation for facility entry	As Soon As Practical	Staff Advisor or Facility Non-DOC Personnel Coordinator	Phone or email
ONSITE PIOC/OFFENDER BEHAVIOR OR SECURITY CONCERNS			
Disruptive PIOC during program/activity	Immediately	Any Available Staff Member	Verbally before leaving facility; follow-up with phone or email contact to Staff Advisor and note staff to whom you reported information.
PIOC discloses overt/covert threats to self or others			
PIOC(s) attempt to exert influence/leadership role within programs or activities			
You learn of immediate concern or future plans for impairing facility security (e.g. riot, escape, drugs, weapons, illegal activity, contraband)			
PIOC reports sexual assault or intimidation			
PIOC discloses previous crimes which may impact facility/community safety (e.g. homicide,			

Addendum 3

WHAT	WHEN	WHO	HOW
sexual assault, domestic violence, battery)			
Medical or other emergency during program/activity			
PIOC/offender requests that you contact victim(s)			
OFFSITE PIOC/OFFENDER BEHAVIOR CONCERNS			
PIOC/offender (or individual on their behalf) contacts you by mail/phone/email	By Next Business Day	Staff Advisor or Facility Non-DOC Personnel Coordinator	Phone –do not leave voice message; speak to on-duty staff; follow-up with phone or email contact to Staff Advisor
PIOC/offender solicits financial or in-kind support (e.g. purchases, medical, legal)			
PIOC/offender solicits your support or advocacy for personal issue (e.g. legal, parole, post-release employment or housing, family issues)			
PIOC asks you to keep secrets, requests personal information, or tries to develop personal relationship			
FACILITY SECURITY ISSUES			
Disagreement with staff member and/or feel harassed/bullied	By Next Business Day	Facility Non-DOC Personnel Coordinator	Phone or email, with further follow-up as appropriate
You become aware of incident(s) of employee harassment or bullying			
Contacted by media regarding your DOC activities/role			
You learn of PHI from anyone other than the PIOC (e.g. staff disclosure, inappropriate record storage)			
You want to bring items into the correctional facility which have not been previously approved (e.g. donated items, program materials, medication)	As Soon As Practical	Staff Advisor	Phone or email
FRATERNIZATION POLICY			
Learn that your family member or close associate is incarcerated or placed on community supervision	By Next Business Day	Staff Advisor	Phone or email; will discuss whether to complete a DOC-2270 Fraternization Exemption form.
Unanticipated/incidental contact in community with former PIOC, offender and/or their family			
Anticipate intermittent future interactions with PIOC/offender or their family (e.g. has joined your church, moved to your community, frequents your workplace, etc.)			

Addendum 4

DAI Policy 309.61.01 – Religious Beliefs and Practices Attachment – Congregate Religious Event Conduct Effective – 01/22/19

The purpose of religious programming is to provide inmates with opportunities for worship, study and spiritual growth. Firm, fair and consistent expectations are necessary to advance this objective.

- Inmates shall respect the time and resources donated by volunteers and faith communities.
- Inmates shall be attentive and respectful, and shall not engage in side conversations.
- Conduct which interferes with the religious practices of other inmates will not be tolerated.

Inmates who violate the terms of Congregate Religious Event Conduct may be subject to disciplinary consequences, including immediate removal from religious events, and/or other discipline consistent with Wisconsin Administrative Code Ch. DOC 303.

Religious programming shall be led, facilitated or supervised by DOC staff members or community volunteers. Inmates are prohibited from:

- Leading the group (i.e. Preaching, teaching, proselytizing)
- Adopting false names or titles in violation of Wisconsin Administrative Code s. DOC 303.35 (e.g. Imam, Reverend, Father, Brother, Deacon, Elder, Pipe Carrier, etc.)
- Electing or designating inmates to carry out leadership roles
- Exercising authority over other inmates
- Defining the beliefs of the group
- Controlling or directing the program content or agenda (e.g. topics, readings, music, etc.)
- Directing how the religion or rituals will be practiced
- Directing who is or is not allowed to participate in events or rituals
- Dictating pre-requisites for others' participation (e.g. ablution, baptism, fasting, heritage, specific studies, etc.)
- Imposing their own religious adherence-level on others

DOC staff members or community volunteers may structure appropriate inmate participation in various aspects of religious programming as follows:

- The Chaplain/designee holds final authority over program content and inmate roles.
- Inmate roles must be planned, scripted or otherwise pre-approved by the Chaplain/designee prior to the event.
- Limited inmate roles within programming may include (not exhaustive): calling the prayer; carrying the pipe; singing in choir; reading a designated passage; performing as a musician; participating in rituals; acting as the fire starter.
- The Chaplain/designee shall randomly and equitably assign roles to inmates, and regularly rotate the roles among all participants.
- All inmates are equally invited to learn and grow through various participation roles.
- On a limited basis, the Chaplain/designee may poll broad inmate preferences on subject matter, reading materials, music, etc.

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Addendum 5

PREA: A Guide for Non-DOC Personnel, Business & Professional Visitors

Sexual Abuse & Sexual Harassment in Confinement: Zero Tolerance

The Prison Rape Elimination Act (PREA) was signed into law in 2003 after unanimous support from Congress and years of pressure from advocates and survivors. PREA extends far beyond the elimination of rape in prison; it is the first federal law to support preventing, detecting, and responding to sexual abuse and sexual harassment in all confinement settings. As such, Wisconsin Department of Corrections (WI DOC) has zero tolerance for sexual abuse, sexual harassment and report-related retaliation of offenders perpetrated by other offenders, staff, contractors and volunteers. Executive Directive (ED) 72 reflects this commitment. All allegations of sexual abuse and sexual harassment are investigated by WI DOC and referred to law enforcement.

ALL NON-DOC SERVICE PROVIDERS SHALL

Immediately report:

Any knowledge, suspicion or information regarding an incident of sexual abuse or sexual harassment;

Retaliation against a victim or reporter of sexual abuse or sexual harassment; and/or

Any staff, volunteer or contractor neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Report via any of the following methods prior to leaving the facility:

Notify a supervisor (e.g., shift supervisor, security director, PREA compliance manager, warden, deputy warden, superintendent);

Email DOCSECOSOPREAINvestigations@wisconsin.gov;

Call the PREA Office at 608.240.5071;

[WI DOC's public website](#)

Additionally:

Request the alleged victim not take actions that may destroy physical evidence (i.e. drinking, washing, changing clothes, etc.).

Not reveal any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in DOC policy, to make treatment, investigation, and other security and management decisions.

Vulnerable Offenders

Understanding the characteristics that put an offender at higher risk for sexual victimization creates awareness and greatly improves WI DOC's ability to prevent and detect sexual abuse and harassment. Vulnerable offenders include those with the following traits:

- Mental, physical or developmental disability or illness
- Small in stature, first time or young
- Limited English proficiency
- Intoxicated or under the influence
- Resource poor
- Sex offender
- Prior sexual victimization
- Identifies, or perceived, as lesbian, gay, bisexual, transgender, intersex, or gender non-conforming

Indicators of Abuse

While not absolutes, there are often red flags that may indicate compromised boundaries or abuse. Each is an opportunity to intervene!

Perpetrators (actual or potential) may stalk, groom, or trade favors; have a prior history of sexual abuse; display voyeuristic or exhibitionistic behaviors; frequently test boundaries; have difficulty controlling anger; isolate from co-workers; have changes in their personal life or appearance; and/or bring inappropriate/contraband items to work.

Victims (actual or potential) may refuse to shower; leave their empty cell or return to their occupied cell; exhibit unusual aggressiveness; linger near staff; bed wet; use increased sexualized language; and/or engage in protective pairing.

DEFINITIONS

Sexual Abuse

Offender-on-Offender Sexual Abuse. Sexual abuse of an offender by another offender includes any of the following acts, if the victim does not consent, is coerced into such act by overt or implied threats of violence, or is unable to consent or refuse:

- Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
- Contact between the mouth and the penis, vulva, or anus;
- Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument; and
- Any other intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or the buttocks of another person, excluding contact incidental to a physical altercation.

Staff, Contract, or Volunteer -on-Offender Sexual Abuse. Sexual abuse of an offender by a staff member includes any of the following acts, with or without consent of the offender:

- Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
- Contact between the mouth and the penis, vulva, or anus;
- Contact between the mouth and any body part where the staff member has the intent to abuse, arouse, or gratify sexual desire;
- Penetration of the anal or genital opening, however slight, by a hand, finger, object, or other instrument, that is unrelated to official duties or where the staff member has the intent to abuse, arouse, or gratify sexual desire;
- Any other intentional contact, either directly or through the clothing, of or with the genitalia, anus, groin, breast, inner thigh, or the buttocks, that is unrelated to official duties or where the staff member has the intent to abuse, arouse, or gratify sexual desire;
- Any attempt, threat, or request by a staff member to engage in the activities described in paragraphs (1)-(5) of this section;
- Any display by a staff member of his or her uncovered genitalia, buttocks, or breast in the presence of an offender; and
- Voyeurism by a staff member.

Voyeurism

An invasion of privacy of an offender by staff for reasons unrelated to official duties, such as peering at an offender who is using a toilet in their cell to perform bodily functions; requiring an offender to expose their buttocks, genitals, or breasts; or taking images of all or part of an offender's naked body or of an offender performing bodily functions.

Sexual Harassment

Offender-on-Offender Sexual Harassment. Repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one offender directed toward another.

Staff-on-Offender Sexual Harassment. Repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one offender directed toward another.



DAI POSITION REGARDING NON-DOC PERSONNEL MATERIAL SUPPORT TO PIOC

Reference: *Executive Directive 16 – Fraternization Policy*
DAI Policy 309.06.03 – Non-DOC Personnel, Business & Professional Visitors

Some community ministries provide financial/material support or comfort items through pastoral care. DAI policies, however, prohibit Non-DOC Personnel – including religious volunteers and pastoral visitors – from giving PIOC anything of material value (e.g. money, stamps, food items, clothing, etc.) during incarceration. Financial/material support is permitted only in very limited circumstances and through planned reentry initiatives for discharging PIOC. This requires pre-approval of a DOC-2270A Fraternization Policy Exception Request specifying the allowable support. See *Fraternization* section of manual for more detailed explanation of permissible and prohibited interactions.

DAI’s rationale for prohibiting financial/material support to PIOC during incarceration are based upon these principles:

IN THE COMMUNITY	WITHIN CORRECTIONAL FACILITIES
Individuals may be in a truly desperate state – both physical and spiritual. Community religious leaders may need to address immediate physical wellbeing before addressing spiritual needs.	Immediate survival needs of PIOC (housing, clothes, food, medical care, etc.) are met by the resources of the correctional facility. So spiritual care is the primary need.
Reasons ministries may provide individual financial/material support:	Financial/material support cannot meet PIOC deeply personal spiritual needs, such as:
<ol style="list-style-type: none"> 1) tradition of hospitality 2) invite participation 3) comfort-giving 4) rapport-building 5) demonstrating compassion 6) reduce guilt about the situation 7) clergy’s personal preference 8) personal friendship 	<ol style="list-style-type: none"> 1) coping with incarceration 2) separation from family 3) guilt 4) drug/alcohol abuse 5) interpersonal relationships 6) trauma history 7) rehabilitation efforts

Religious leaders who wish to provide financial/material support to PIOC during incarceration may want to consider the *American Association of Pastoral Counselors (AAPC) - Code of Ethics* (Amended April 2012, pending revision as of August 2018) wherein Principle III – Client Relationships, subparagraph E. states:

“We recognize the trust placed in and unique power of the therapeutic relationship. While acknowledging the complexity of some pastoral relationships, we avoid exploiting the trust and dependency of clients. We avoid those dual or multiple relationships with clients which could impair our professional judgment, compromise the integrity of the treatment, and/or use the relationship for our own gain. A multiple relationship occurs when a pastoral counselor is in a professional role with a person and 1) at the same time is in another role with the same person, 2) at the same time is in a relationship with a person closely associated with or related to the person with whom the pastoral counselor has the professional relationship, or 3) promises to enter into another relationship in the future with the person or a person closely associated with or related to the person. In instances when dual or multiple relationships are unavoidable, particularly within congregations or in family or couples counseling, we take reasonable steps to protect the clients and are responsible for setting clear and appropriate boundaries.”

Addendum 6

DOC experience suggests that clergy financial/material support during incarceration may actually detract from PIOC spiritual growth and undermine offender rehabilitation.

1. The dual/multiple roles of pastoral care-giver, resource provider and/or friend can undermine the therapeutic relationship.
2. PIOC may be motivated by financial/material support, rather than spiritual growth.
3. PIOC may try to manipulate or solicit further financial/material support.
4. Support may interfere with PIOC learning:
 - pro-social interpersonal interactions, resulting in dysfunctional relationships
 - healthy coping skills to replace emotional manipulation
 - to follow rules, participate in criminogenic treatment programs, obtain employment, earn money and learn to take pride in one's work
 - problem-solving, planning and patience skills.
5. Those receiving financial support may not adequately prepare for community reentry if they depend upon others to provide resources.

Clergy who selectively provide financial/material support to individual PIOC may unintentionally create facility security risks.

1. Clergy may become a target for solicitation from other PIOC.
2. PIOC receiving support may become targets for extortion or strong-arming by other PIOC.
3. Disparities between PIOC who do/don't receive support can create power differential, tension and conflict.

Donations to support DOC chapel programs are welcomed. Facilities often accept in-kind donations which meet DAI policy specifications, as well as funds to support congregate ministry and general use items.

Ministries wanting to provide individual PIOC with financial/material support may prefer to have PIOC contacts via the visitor list rather than pastoral visitor privileges. Those on the PIOC's approved visitor list may deposit money in the PIOC's accounts.

Please notify facility staff if you wish to withdraw from active DAI religious volunteer or pastoral visitor status. The PIOC may then pursue in addition to his/her visiting list with form DOC-21AA – Visitor Questionnaire.

DEPARTMENT OF CORRECTIONS
Office of the Secretary
DOC-2270A (Rev. 6/2016)

WISCONSIN
Wisconsin Statutes
Sections 940.225(2)(h) & (i)

FRATERNIZATION POLICY EXCEPTION REQUEST VOLUNTEER / CONTRACTOR

INSTRUCTIONS: State of Wisconsin employees, contracted staff, or volunteers with the Department of Corrections must report any present contacts, relationship, or relationship being considered which would be in violation of the DOC Fraternization Policy - Executive Directive 18. This form is to be used to initiate any exception request. The employee requesting an exception must complete all areas of the form. Submission of the request does not constitute an automatic exception or immediate authorization for contact. A letter from the Division Administrator will be the only authorization for exceptions.

CHECK FOLLOWING TYPE OF CONTACT <input checked="" type="checkbox"/> Ongoing / Anticipated or <input type="checkbox"/> One Time / Unanticipated		
SUBMITTER NAME	CIVIL SERVICE CLASSIFICATION (if relevant)	DATE OF REQUEST
DIVISION (if relevant)	INSTITUTION or BUREAU / OFFICE or REGION & UNIT	
IMMEDIATE SUPERVISOR'S / CONTACT NAME	SUPERVISOR'S / CONTACT TELEPHONE NUMBER	
OFFENDER'S FULL NAME	DOC NUMBER	OFFENDER'S DATE OF BIRTH
DOC DIVISION NAME CURRENTLY SUPERVISING OFFENDER	LOCATION OF SUPERVISION	
NATURE OF EMPLOYEE RELATIONSHIP TO OFFENDER		
<input type="checkbox"/> RELATIVE – CLEARLY DEFINE HOW YOU ARE RELATED		
<input type="checkbox"/> OTHER – CLEARLY DEFINE RELATIONSHIP (explain how you met, the length of the relationship, and the purpose of your relationship)		
CHECK ALL OF THE FOLLOWING THAT WOULD APPLY REGARDING YOUR PROPOSED RELATIONSHIP		
<input type="checkbox"/> Living in same household with an adult or juvenile offender		
<input type="checkbox"/> Working for an adult or juvenile offender		
<input type="checkbox"/> Employing an adult or juvenile offender with or without remuneration		
<input type="checkbox"/> Extending, promising, or offering any special consideration or treatment to an adult or juvenile offender		
<input type="checkbox"/> Having personal contacts (other than those required by my job duties) such as communicating through verbal, written or electronic means or being in a social or physical relationship with an adult or juvenile offender		
<input type="checkbox"/> Providing or receiving goods (including money) and/or services without remuneration for or to adult or juvenile offender(s)		
<input type="checkbox"/> Other – Explain:		
DATE OF LAST CONTACT WITH OFFENDER		
NATURE OF LAST CONTACT WITH OFFENDER		
CLEARLY DEFINE YOUR PROPOSED ACTIVITIES WITH THE OFFENDER IF GRANTED AN EXCEPTION TO THE POLICY (Include visiting, telephone contact, written correspondence, social media, incidental contact, etc)		
CAN YOU IDENTIFY ANY POSSIBLE CONFLICT OF INTEREST IF THIS REQUEST IS APPROVED (describe in detail)		
SUBMITTER SIGNATURE		DATE SIGNED
COMMENTS:		

YOU WILL BE NOTIFIED OF THE ACKNOWLEDGMENT, APPROVAL OR DENIAL RESPONSE, WHICH WILL BE PROCESSED ELECTRONICALLY VIA THE DOC-2270 EFORM.

DISTRIBUTION: Original – OnBase DOC-2270 Fraternization Policy Exception Request; Copy – Supervisor; Copy - Employee

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REVIEW OF PROFESSIONAL BOUNDARIES

Am I a Target of “The Sting”? PIOC can take advantage of you only if you let them.

Take notice and trust your gut! For self-reflection:

- Do PIOC try to engage me in personal conversations about likes, dislikes, family, work, or other sensitive issues?
- Have PIOC been excessively nice, attentive, or showered me with compliments?
- Are PIOC offering help or doing extra work to gain my favor?
- Did PIOC ever imply I’m the only person they can talk to or rely on?
- Has any PIOC tried to convince me “the system” is against them or unfair?
- Are PIOC trying to create an us-versus-them dynamic or form an alliance with me?
- Do PIOC pester me to do things outside my approved Non-DOC Personnel role?
- Have PIOC broken minor rules in my presence or defied my instructions?
- Does it feel like PIOC are “pushing my buttons” or trying to exhaust my patience?
- Are PIOC trying to turn me against DOC staff or other Non-DOC Personnel?
- Have PIOC implied I may be in danger from others or offered to protect me?
- Has any PIOC threatened me directly or indirectly?

If you experience these, ask yourself:

- Am I too sympathetic?
- Have I used first names with PIOC (after being instructed to not do so)?
- Do I think it’s okay to touch or share personal items with PIOC (e.g. mint, gum, pen)?
- Is it difficult for me to say “NO” to PIOC?
- Have I ever allowed PIOC do personal favors for me?
- Do I feel PIOC have a right to say “NO” to me?
- Do I look forward to sharing good/bad news with a PIOC?
- Have I talked about personal matters or shared my problems with PIOC?
- Have I ever received personal advice from a PIOC?
- Do I ignore minor rules or let issues slide that should be addressed immediately?
- Would I hesitate to report PIOC rule violations to DOC staff?
- Would I be reluctant to have my Staff Advisor observe my behavior with PIOC?
- Have I ever done anything with a PIOC that I wouldn’t want my family to know?
- Has a PIOC ever shared sexual fantasies or jokes in my presence?
- Have I had fantasies about a PIOC or shared any sexual thoughts with a PIOC?
- Do I look forward to seeing a particular PIOC when at the facility? Does this extend to planning how to be alone with that individual?
- Could PIOC influence me to bring contraband or violate DOC rules?

Consult your Staff Advisor right away if your response to any of these questions is “YES.”

Recognizing your vulnerable areas enables you to adjust and become more effective in your approved Non-DOC Personnel role.

Addendum 8

Remember – it's never too late to stop The Sting!
Report PIOC actions immediately if you suspect anyone is being targeted for a Set-Up.
Help one another stay safe!

BEST PRACTICES	AVOIDING PROBLEMS
Know the policies/rules/procedures.	Be mindful of the limits of your role.
Verify information – <u>with staff</u> – before taking any kind of action.	Never do anything to, for, or with any PIOC that you would be ashamed to share with your peers, staff or spouse/family.
Always use professional language, addressing PIOC, Non-DOC Personnel and staff by title (e.g. Mr., Ms., Rev., Dr., Sgt., Officer) and <u>last name</u> .	Don't permit use of first names or nicknames for PIOC, staff or Non-DOC Personnel. Being overly familiar degrades professional boundaries.
Only bring items into the facility or take items out of the facility when you have explicit, prior staff approval.	PIOC are prohibited from assuming leadership roles. Do not address PIOC by a title reflecting authority or honor (e.g. Brother, Chief, Colonel, Corporal, Doctor, Elder, Father, Honorable, Imam, Pastor, Professor, Rabbi, Reverend).
Facility donations require advance authorization and proper paperwork.	
Provide program materials intended for PIOC use to staff for prior review. Upon approval, staff will distribute or will provide direction regarding distribution.	Never allow a “you/me” dynamic to develop. Never complain about rules or staff in front of PIOC. This re-enforces PIOC/staff separation.
Be aware of the body language messages you transmit.	Never give PIOC anything that they are not normally permitted to have.
Respect PIOC privacy. They may be reluctant to discuss certain topics.	Never accept anything from PIOC including information on outside matters or other items.
Always have a witness to your interactions with PIOC.	Report suspicious or unusual behavior, no matter how minor it may seem.
If you suspect a PIOC's request or action could lead to manipulation, tell them you must check with staff. Tell your Staff Advisor what took place – even if the PIOC withdraws the request.	Limit use of personal stories. Your experience may be a useful teaching tool in the community. But be mindful to protect your privacy in the correctional facility.
Recognize that DOC must sometimes adapt typical community practices for safety and security reasons.	Avoid conversations with PIOC about issues that may affect staff (e.g. local school events, current political issues, wedding/graduation announcements).
Be aware and respectful of different backgrounds, beliefs and experiences (e.g. ethnic, culture, social, racial, religious, economic, political, sexuality).	Avoid controversial subjects (e.g. politics, abortion, LGBT rights, racial/gender equality). Disparaging other groups is strictly prohibited. These issues can escalate tensions and create a hostile or unsafe environment for PIOC and staff.
Encourage PIOC to take responsibility for their behaviors.	Non-DOC Personnel cannot advocate on a PIOC's behalf for parole, security classification, programs, medical issues, release, etc.
Respectfully and firmly direct PIOC to stop saying/doing anything that makes you uncomfortable.	Don't ignore awkward situations. Ask staff for assistance if you are uncomfortable addressing PIOC behaviors directly.
Remind PIOC they have a formal complaint process for resolving problems. Empower PIOC to problem-solve using appropriate channels. This can foster pro-social attitudes and self-reliance.	Do not exchange mail, email or phone calls with PIOC – or their family. Notify your Staff Advisor or Facility Non-DOC Personnel Coordinator <u>immediately</u> .
If you have done something inappropriate, tell your Staff Advisor or a supervisor regardless of what happened. It is far better to be reprimanded than to become a criminal.	If you are contacted by any PIOC/offender – or third party on their behalf – <u>do not respond</u> . Notify your Staff Advisor or Facility Non-DOC Personnel Coordinator <u>immediately</u> .
Learn to say “NO.”	Learn to say “NO.”

SITUATIONS RESULTING IN LOSS OF FACILITY ENTRY PRIVILEGES

- Developing a personal or romantic/sexual relationship with a PIOC.
- Physical contact with a PIOC beyond that permitted within professional boundaries.
- Assisting a PIOC in selling artwork or hobby items.
- Serving as power of attorney for a PIOC or acting as a PIOC's legal advocate (if these actions fall outside of approved Non-DOC Personnel role).
- Bringing items into the institution to give to a PIOC.
- Buying chips/soda for PIOC from visiting room vending machines.
- Preaching or disseminating information which is inflammatory or denigrates (topics such as faith, gender, politics, race, sexuality, etc.)
- Allowing a PIOC to assume a position of authority or lead a program/service/activity.
- Lying or falsifying information on application for facility entry privileges.
- Engaging in criminal behavior in the community.
- Engaging in business relationships with PIOC family members or former PIOC.
- Taking pictures of the institution and PIOC without permission.
- Carrying PIOC mail in/out of the institution.
- Advocating that PIOC forgo DOC programming/treatment because of spiritual beliefs.
- Contacting a PIOC's family or victim(s).
- Failing to follow instructions from DOC staff.
- Engaging in sexual dialogue with a PIOC (verbal or written).
- Disparaging DOC officials or policies to PIOC.
- Submitting false mileage reimbursement requests.
- Any of the following without first obtaining permission via DOC-2270A:
 - Providing contact information (e.g. address, email, phone number) to PIOC.
 - Corresponding by mail/email, accepting phone calls or visiting any PIOC.
 - Assisting with a PIOC's release plan, including clothing, employment, funding, housing, transportation, etc.
 - Depositing money into a PIOC account (personally and through a third party/organization)
 - Financing a PIOC's personal expenses (e.g. canteen items, correspondence courses, hobby materials, personal property, phone/email services).
 - Visiting a PIOC in the hospital.

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WISCONSIN DEPARTMENT OF CORRECTIONS

Governor Tony Evers / Secretary Kevin A. Carr

MEMORANDUM

DATE: April 6, 2022

TO: DAI Volunteers and Religious Organizations

FROM: Robert Miller, Security Chief
Kelli Willard West, Religious Practices Coordinator

SUBJECT: **New Procedures for Inspecting Religious Material Donations & Mail**

Wisconsin DOC needs the help of religious communities to protect the persons in our care (PIOC). The growing problem of drugs entering facilities and overdose incidents of PIOC pose serious dangers to our facility populations, staff members and volunteers, as well as the public at large. In late 2021, Wisconsin DOC experienced 25-30 overdoses each month from illegal drugs entering through the mail and various paper materials. This makes it necessary to limit everything entering facilities, and to implement a consistent and strict inspection regimen – including donated religious items and publications.

For this reason, Wisconsin DOC has established a new mail processing contract. Unfortunately, this may trigger increasingly creative attempts to smuggle intoxicants into DAI facilities. Wisconsin DOC, and correctional facilities throughout the U.S. have already documented incidents of illicit efforts to circumvent mail inspection under the guise of protected/confidential legal or medical mail.

https://journaltimes.com/news/state-and-regional/two-men-charged-in-scheme-to-smuggle-drugs-into-kenosha-county-jail/article_cf33dd9a-fd1f-5a32-b8e6-574d8b89b751.html

It would be naïve to assume donations from religious organizations and volunteers are immune to this risk. Any PIOC or public perception that religious materials are not closely scrutinized will invite nefarious efforts to use the Chapel as a conduit for contraband. This could undermine DOC's ability to make religious materials and accommodations available. For example BOP and other correctional agencies have recently experienced drug trafficking through chapel materials.

- <https://oig.justice.gov/sites/default/files/2019-12/2019-08-01a.pdf>
- <https://www.dea.gov/press-releases/2017/06/13/prison-chaplain-sentenced>
- <https://www.newsweek.com/man-allegedly-posed-pastor-bible-smuggle-drugs-prison-1278632>
- <https://abc13.com/meth-bible-smuggled-in-hidden-inmate-smuggling/1811014/>

Therefore – in addition to normal content-appropriateness screening – Chaplains and staff will work closely with Security Directors to establish procedures for receiving and inspecting donated religious materials.

Thank you for your dedication to religious ministry with our population, and generous donations to our facilities. We appreciate your patience and collaboration as DOC works through these procedural changes.

General Guidelines for Religious Communities

Organizations which mail newsletters, religious study materials, pamphlets, etc. directly to individual PIOC are encouraged to review the attached memo regarding the TextBehind document management system (DMS). For reference:

- Bound publications (i.e. books, textbooks, magazines, newspapers, workbooks) sent directly to inmates should continue to be mailed from the publisher/commercial business to the facility addresses. These will be delivered to PIOC after careful inspection by security staff.
- Mail unbound/loose/stapled correspondence, newsletters, pamphlets, etc. to TextBehind's Phoenix, MD post office box. The DOC contract covers the cost of providing photocopies to PIOC.
- TextBehind offers a fee-based document management system (DMS) to external organizations for electronic distribution of materials to PIOC. PIOC can receive emails at no cost via facility kiosks or personal electronic tablets. PIOC incur nominal cost (less than first-class mail/stamp) to send emails.
- Volunteers and religious organizations must provide at least one week notice of their intent to bring/ship donations (e.g. candles, incense, prayer beads, rosaries, sacred tobacco) and published/bound written materials to the facility. **NOTE: This is necessary to arrange security officer availability for inspection.**
- Facilities will not accept donations from any source (including volunteers) which have not been pre-approved and properly inspected. Unapproved materials will be disposed of or returned.
- Volunteers are required to email the Chaplain/designee any written materials (e.g. study guides/handouts) in advance of scheduled religious programming.
 - Upon receipt of electronic materials, facilities will screen content for appropriateness.
 - Chaplain/designee will coordinate with Security Director to ensure staff availability for inspecting written materials brought into facility by volunteers (i.e. date/time, quantity, number of pages, format, etc.).
 - Volunteers will be asked to arrive early to allow time for security inspection of written materials, or to mail/deliver copies in advance of scheduled programming.
 - Volunteers should be aware that deadlines and page limitations may be imposed to help facility staff manage workload.
 - Facilities may also encourage use of electronic media during religious programming (e.g. PowerPoint, overhead slides) in lieu of paper copies to reduce security inspection workload.
- All donations will be X-rayed by security staff and closely inspected for signs of controlled substances or contraband. **NOTE: This is important to assure the safety of all PIOC, staff members, volunteers, contractors and visitors entering DAI facilities.**
- DAI policy 300.00.26 (<https://doc.wi.gov/DepartmentPoliciesDAI/3000026.pdf>) requires facilities to track PIOC enrollment in correspondence courses (including non-accredited religious self-improvement studies), though class completion is recorded only for academic classes. See correspondence from the DAI Education Director dated 12/27/2021 (attached) for further details. **NOTE: Pre-paid mailers/envelopes are prohibited.**

Volunteers or religious organizations with further questions can review the DOC and TextBehind websites for further information about contraband, drugs, and the new mail processing contract. Additionally, the *DAI Volunteer, Pastoral Visitor, Program Guest & Intern Orientation Manual* offers summaries of applicable Wisconsin Statutes:

- <https://doc.wi.gov/Pages/Home.aspx>
- <https://family.textbehind.com/help-topics>
- <https://doc.wi.gov/Documents/OffenderInformation/AdultInstitutions/DAIVolunteerPastoralVisitorProgramOrientationManual.pdf>

Addendum 10



Corporate MEMO
Issued by the CEO, TextBehind, Inc.
December 03, 2021

To: The Wisconsin Department of Corrections and their external stakeholders,

Subject: Value proposition of the TextBehind DMS service
for organizations sending mass communication content
to the incarcerated individuals across the WIDOC Institutions

An Overview

To mitigate the contraband issue, on December 6, 2021, the mail policy for the PIOC's (Persons In Our Care) across the WIDOC State Correctional Institutions is changing by utilizing the TextBehind, Inc as the offsite mail management service provider for 'non-privileged' communications between family & friends, businesses and their incarcerated loved ones.

The non-privileged content also includes mass communications sent by various non-profit, and for-profit organizations such as Churches, Ministries, Educational Institutions, law libraries, and various agencies providing post-incarceration opportunities, the ("Organizations").

The processing of mass communications creates certain operational challenges for the correctional institutions, in addition to potentially carrying life-threatening contraband threat. Therefore, TextBehind offers an alternative method to streamline document processing for both, the WIDOC institutions, and the Organizations.

As a professional and experienced mail management company, TextBehind understands the financial, and operational challenges faced by Organizations when printing and shipping mass communications, and generally communicating with the PIOC's.

TextBehind is a purpose specific company that has the knowledge, workforce, and the equipment to make it more efficiency, and cost-effective to process, and deliver large volume of content (mass communication) to the correctional institutions nationwide.

TextBehind also makes it more manageable for the correctional institution to review, approve, and distribute such contents to the PIOC's without worrying about potentially life-threatening contraband.

TextBehind DMS Processing, and How It Works

The Challenges:

Organizations generally face one or more of the following challenges when sending mass communications to the WIDOC institutions or elsewhere nationwide:

1. Assembling and printing large volume of content
2. Packaging contents for individual PIOC's that add up the cost and repetitive labor
3. Shipping the contents to each of the applicable institutions nationwide requires actively updating the correctional facility, and the incarcerated individual data
4. No recourse for undeliverable mail due to outdated PIOC/inmate data resulting in significant wasted of paper, resources, time and lack of trackability
5. Facing frequent rejections of content due to variable mailing policies

The Advantages of Utilizing TextBehind DMS Service:

1. Organizations can have on demand access to the business solutions staff to help them setup with the DMS service based on their unique needs, and to provide the most transparent cost proposals
2. No need to print, package or ship. Organizations can send all printable materials as PDF files to TextBehind online via the cloud
3. TextBehind has selectable nationwide correctional institution address database
4. Based on active inmate rosters received by TextBehind directly from the institution JMS system, Organizations pay only for the deliverable orders, thus eliminating resource wastage
5. The approval rate of mass communications is significantly increased because the TextBehind printing format is generally accepted by all institutions nationwide

Billing for DMS Services

Primarily, mail to the PIOC's is delivered in print format. While there are certain operational, production and shipping costs incurred by TextBehind, our specialized processes, equipment, and knowledge enables to offer the DMS service to the Organizations for a fee that is generally less than their existing costs.

TextBehind adds value to the Organizations in multiple ways:

- 1) Cost savings based on more affordable billing for large volume or frequent orders
- 2) Cost savings by eliminating in-house printing & shipping by the organization
- 3) Cost savings by significantly reducing rejected and undelivered mail
- 4) Efficiency by process automation, including a no-cost consultancy service to help organizations improve their existing content delivery process for higher efficiency

Contact TextBehind for DMS Service Information and a Quote

As a compassion-driven company, TextBehind, Inc is available to assist all organizations interested in our DMS services. For questions and consultancy, please visit the <https://family.textbehind.com/help-topics> link to learn more about the DMS service, and to contact us for a quote. You may also send an email to info@textbehind.com to request information.

Sincerely,
TextBehind, Inc,
Mr. Zia Rana, CEO – TextBehind, Inc.
Connecting Relationships Today for a Better Tomorrow
zia@textbehind.com
www.textbehind.com



WISCONSIN DEPARTMENT OF CORRECTIONS

Governor Tony Evers / Secretary Kevin A. Carr

Division of Adult Institutions

Benjamin Jones
3099 E Washington Ave
Madison, WI 53704
Benjaminw.jones@wisconsin.gov

December 27, 2021

To: Correspondence course providers within WI DOC institutions

RE: Mail process

Greetings,

I am writing to update and provide you with some information related to a new mailing process within WI Department of Corrections (DOC), Division of Adult Institutions (DAI). You are receiving this information because you are a known provider of correspondence courses to persons in the DOC's care.

As of Dec. 6, 2021, DOC has contracted with a vendor, TextBehind. The vendor will send photocopies of the original mail to be delivered to the persons in our care. The vendor also offers a system where mail can be created or sent electronically. The DOC's goal is to make the institutions safer by eliminating original mail from entering the institutions because it has proven to be a source of contraband. We value the opportunities you provide to people and seek to be as active a partner as we can in navigating this change.

You are encouraged to do the following things that will assist you in your business relationships with people you interact with in the DOC:

- Review the FAQ document attached.
- See the attached memo from TextBehind. Consider setting up an account with them directly and utilize their document management system (DMS).
- Review your policies and procedures related to outgoing mail to your student customers.
- Pre-paid self-addressed envelopes will no longer be accepted. We learned this practice has been inconsistent, therefore, they will no longer be allowed.

As a guideline for decisions, DAI will follow the principles below: 1. Correspondence courses are self-funded and regulated by DAI for security challenges and the use of institutional resources. 2. All persons in our care must seek permission to take correspondence/self-improvement courses because resources of the DOC are used to fulfill the service. 3. Safety of the persons in our care and staff members is our primary mission and will be the sole criterion to measure whether items are allowed or not.

Below is an outline of the types of mail that we typically receive from correspondence providers and their disposition under this new procedure:

Application forms/ general paperwork	Use TextBehind service or address
Introductory letters	Use TextBehind service or address

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Correspondence from instructors	Use TextBehind service or address
Packets of materials from instructors that is not bound	Use TextBehind service or address
Bound textbooks/materials	Cannot use metal binding materials: Continue to send to the site.
FERPA protected Transcripts/grade reports	* Our contract with TextBehind includes privacy language regarding protected data. Preference is to send these protected documents directly to the institution address. If the student needs to receive the original, they will need to be sent to the Institution Education Director. TextBehind does not send original documents.
Self-addressed/pre-paid envelopes	Not permitted.



If you have questions, please reach out to our office.

With thanks,

Benjamin Jones

Ben Jones, DAI Education Director

WI Department of Corrections.

<p>WISCONSIN DEPARTMENT OF CORRECTIONS</p>  <p>EXECUTIVE DIRECTIVES</p> <p>3099 E. Washington Ave. P.O. Box 7925 Madison, WI 53707-7925 (608) 240-5000</p>	DOC Library # 800.200.0002	
	Original Effective Date: November 26, 2002	New Effective Date: August 3, 2022
	Reference:	Date of Approval: August 3, 2022
	By: 	
Owner: Division of Management Services		

EXECUTIVE DIRECTIVE # 43

Subject: Work Rules

I. Authority

Wis. Stats. Ch. 111
 Wis. Stats. Ch. 230
 Wisconsin Administrative Code Employment Relations
 Wisconsin Administrative Code Employment Relations — Merit Recruitment and Selection
 Wisconsin Human Resources Handbook Chapter 410
 Department of Corrections Executive Directives
 Department of Corrections Human Resources Policies

II. Background

The State of Wisconsin has established work rules that regulate the personal conduct of all employees, contractors, interns, and volunteers. These rules are established so the State of Wisconsin can achieve its objectives in an orderly and efficient manner.

IV. Scope

This policy applies to all employees, contractors, interns and volunteers.

V. Policy

Work rules are established by the State of Wisconsin, within its discretion, to regulate the personal conduct of all state employees while on the job. These rules are established so the State of Wisconsin can fulfill its objectives in an orderly and efficient manner. The work rules are not intended to restrict the rights of employees, but rather advise employees of prohibited conduct. The Department of Corrections will apply the work rules in a fair and equitable manner. Work rules may apply to off-duty employee conduct.

which adversely affects the ability of the Department to carry out its mission or adversely affects the ability of an employee to perform his or her duties and responsibilities.

All employees are required to acknowledge receipt of the State of Wisconsin work rules by the process established by the Department. An employee who refuses to acknowledge receipt of the work rules remains responsible for adhering to the work rules. A copy of the State of Wisconsin work rules is attached.

State of Wisconsin Work Rules

The State of Wisconsin has established Work Rules which govern employee conduct so that the State of Wisconsin can fulfill its objectives in an orderly and efficient manner. Violation of any of the work rules may result in disciplinary action ranging from a suspension to discharge, depending on the seriousness and frequency of the infraction. In all cases, the State of Wisconsin considers discipline as corrective. Specifically, all employees of the State of Wisconsin are prohibited from committing any of the following acts:

1. Falsification of records, knowingly giving false information or knowingly permitting, encouraging or directing others to do so. Failing to provide truthful, accurate and complete information when required.
2. Failure to comply with written agency policies or procedures.
3. Disobedience, insubordination, inattentiveness, negligence, failure or refusal to carry out written or verbal assignments, directions, or instructions.
4. Failure to observe all health, safety and sanitation rules and practices, including failure to report accidents which involve injuries or damage to state equipment or property.
5. Failure to report promptly at the starting time or leaving the place of duty before the quitting time without proper authorization, or failure to promptly notify the proper authority of impending absences or tardiness.
6. Unexcused or excessive absenteeism or tardiness.
7. Misuse or abuse of leave benefits.
8. Failure to observe time limits for lunch or break periods.
9. Stealing, unauthorized use, neglect or destruction of government-owned or leased property, materials, equipment or supplies. Includes theft or intentional destruction of personal possessions of staff or others on government-owned or leased property.
10. Unauthorized use, abuse, or misuse of state or private property, materials, facilities and equipment including but not limited to copy machines, computers, mail services, telephone system, fax machine or other electronic media.
11. Unauthorized audio and video recording and photography on state property or while conducting state business.
12. Unauthorized access, disclosure, destruction or use of information or records that could be reasonably considered confidential.
13. Threatening or attempting to inflict, or inflicting bodily harm to or mental anguish to another person.
14. Intimidating, interfering with, harassing, demeaning, treating discourteously, or bullying; or using profane or abusive language in dealing with others.
15. Possession of a controlled substance or analogue without a prescription while on duty; manifesting signs of having consumed alcohol, or illegal drugs; or reporting to work or working in an impaired condition so as to be unsafe to the employee, others, or physical property.

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16. Engaging in unauthorized activities while on duty, including but not limited to gambling, operating a personal business, soliciting, playing games, horseplay or disorderly conduct or other disruptive or unsafe behavior.
17. Making false, inaccurate or malicious statements about another person or the employer.
18. Unauthorized possession, misuse or mishandling of weapons, ammunition or explosives.
19. Entering or permitting others to enter restricted areas without authorization, including unauthorized entry outside assigned work hours or unauthorized entry into restricted areas.
20. Failure to comply with or violating any rule, regulation or order of a professional licensing agency when the license or certification is related to the employee's position.
21. Failure to comply with the provisions of the state code of ethics.
22. Unclean, unkempt, inappropriate dress or grooming which adversely affects proper performance of duties or the image of the employer.
23. Failure to submit to the inspection of items taken from or into work premises.
24. Unauthorized possession, lending, borrowing, destruction or duplicating of keys, access cards, passwords, or other security or access devices.
25. Engaging in any outside activities (including violations or convictions of criminal or other laws) which may impair the employee's independence of judgment or impair the employee's ability to perform his/her duties as an employee of the state.

These work rules do not constitute the entire list of violations which governs the conduct of employees, contractors, unpaid interns, and volunteers. Other rules may be provided by statute, Administrative Code, and by administrative procedures established by management. Violations of these rules may also result in appropriate disciplinary action.

Serious Misconduct

Section 230.34 (1)(a), Wis. Stats., states: "An employee with permanent status in class or an employee who has served with the state as an assistant district attorney or an assistant state public defender for a continuous period of 12 months or more may be removed, suspended without pay, discharged, reduced in base pay, or demoted only for just cause. It is just cause to remove, suspend without pay, discharge, reduce the base pay of, or demote an employee for work performance or personal conduct that is inadequate, unsuitable or inferior, as determined by the appointing authority, but only after imposing progressive discipline that complies with the administrator's standards under s. 230.04 (13m).

It is just cause to remove, suspend without pay, discharge, reduce the base pay of, or demote an employee without imposing progressive discipline for any of the following conduct:

1. While on duty, harassing a person.
2. While on duty, intentionally inflicting physical harm on another person.
3. While on duty, being intoxicated or under the influence of a controlled substance, as defined in s. 961.01 (4) or a controlled substance analog, as defined in s. 961.01 (4m).
4. While on duty, being in possession of a controlled substance, as defined in s. 961.01 (4), or a controlled substance analog, as defined in s. 961.01 (4m), without a prescription.
5. Falsifying records of the agency.
6. Theft of agency property or services with intent to deprive an agency of the property or services permanently, theft of currency of any value, felonious conduct connected with the employee's employment with the agency, or intentional or negligent conduct by an employee that causes substantial damage to agency property.

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7. A conviction of an employee of a crime or other offense subject to civil forfeiture, while on or off duty, if the conviction makes it impossible for the employee to perform the duties that the employee performs for the agency.
8. Misuse or abuse of agency property, including the intentional use of the agency's equipment to download, view, solicit, seek, display, or distribute pornographic material.
9. A serious violation of the code of ethics established by the director under s. 19.45 (11)(a), as determined by the director."

INFECTION CONTROL - HAND HYGIENE**INTRODUCTION**

Infectious agents include viruses, bacteria and fungi. They exist in contaminated items (e.g., clothing, food), on contaminated surfaces (e.g. counters, floors), on body surfaces, in blood or other body fluids, and in the air. Communicable diseases are transmitted to other individuals through different means depending on the infectious agent. The Bureau of Health Services has developed standardized procedures for each type (contact, airborne, droplet and blood/body fluids) of transmission of communicable illnesses. The procedures will assist employees to take precautions that will prevent transmission of a communicable disease.

This policy relates to hand hygiene which is the single most important action that can be taken to prevent the spread of infection. Care of the hands is important to maintain an effective barrier against disease. Using hot water frequently can lead to irritations that can open the skin to germs. Warm water should be used for washing and lotions applied to hands if dry or chapped.

TIMES AT WHICH EMPLOYEES SHOULD WASH HANDS

- Following contact with any potentially infectious substance whether or not gloves were worn
- Upon removal of gloves
- Between touching clean and unclean areas
- Before eating, drinking, handling contact lenses, or applying makeup or lip balm
- After sneezing, coughing or using a handkerchief or tissue
- After using the restroom
- Between taking care of each patient

TECHNIQUE WITH RUNNING WATER AND SOAP

- Use soap and warm running water.
- Rub vigorously over all surfaces for at least 20 seconds.
- Rinse hands well.
- Dry hands with a clean disposable towel or air blower.
- Use a dry towel or your elbow to turn off water.
- Use antimicrobial soaps only when indicated because it removes the skin's natural protective defenses and tends to cause dryness.

TECHNIQUE WITH DISINFECTING HAND WASH

- Utilize disinfecting hand wash when soap and water are not available.
- Use correct amount as indicated on container.
- Rub palms, backs of hands, fingers, fingertips, nails and in between fingers until dry – about 30 seconds.
- Make sure hands are dry before resuming activities.

TREATMENT OF DRY AND/OR BROKEN SKIN

- Utilize lotion to prevent dryness.
- Report problems with products to supervisor.

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INFECTION CONTROL STANDARD PRECAUTIONS

BACKGROUND

Standard Precautions synthesize the major features of Blood and Body Fluid Precautions designed to reduce the risk of transmission of bloodborne pathogens and applies them to all patients receiving care, regardless of their diagnosis or presumed infection status. Standard Precautions apply to 1) blood; 2) all body fluids, secretions, and excretions except sweat, regardless of whether or not they contain visible blood; 3) non intact skin; and 4) mucous membranes. Standard Precautions are designed to reduce the risk of transmission of microorganisms from both recognized and unrecognized sources of infection.

USE STANDARD PRECAUTIONS, OR THE EQUIVALENT, FOR THE CARE OF ALL PATIENTS.

- a. **Handwashing** - See POC-0040
- b. **Gloves** – See POC-0040A
- c. **Mask, Eye Protection, Face Shield** – See POC-0040A
- d. **Gown** – See POC – 0040A
- e. **Patient Care Equipment** - Handle used patient-care equipment soiled with blood, body fluids, secretions, and excretions in a manner that prevents skin and mucous membrane exposures, contamination of clothing, and transfer of microorganisms to other patients and environments. Ensure that reusable equipment is not used for the care of another patient until it has been cleaned and reprocessed appropriately. Ensure that single-use items are discarded properly.
- f. **Environmental Control** – See POC – 0040B
Ensure that the institution procedures for the routine care, cleaning, and disinfection of environmental surfaces, beds, and other frequently touched surfaces are being followed.
- g. **Linen** – See POC-0040B
- h. **Occupational Health and Bloodborne Pathogens**
Instruct inmates who use syringes for health care reasons (e.g. diabetes management) to place used syringes, needles, and lancets in the sharps puncture resistant container provided for this purpose. Staff shall use mouthpieces, resuscitation bags, or other ventilation devices as an alternative to mouth-to-mouth resuscitation methods where there is need for resuscitation
- i. **Patient Placement**
When indicated, health service staff will issue form DOC-3504 "Infection Control: Patient and Employee Precautions" indicating any special placement and staff protections required.
- j. **Respiratory Hygiene**

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