

FEEDBACK & DOC RESPONSES ON DRAFT 501.03 COSA DIRECTIVE
Comment Period: June 22 – July 9, 2012

Final

FEEDBACK	DOC RESPONSE
<p>Line 85 - At this step can the DM or designee deny the referral? It only says they get together with the Community Partner to discuss, but line 90 says the Community Partner can deny the referral for good cause.</p> <p>Line 94 - Shouldn't the Case Summary include the treatment/counseling mandated by DOC in addition to what the Community Partner determines with their broad assessment?</p> <p>Line 168 - I think the word danger is too limiting and too similar to the criteria for emergency arrest. I would like to suggest risky or of concern based on my assessments by the Department and Community Partner.</p> <p>What if an offender chooses to quit? There is an acceptance process, but what about the process for removing an offender from the COSA? It is my understanding that there have been offenders who can't be in the community without a COSA, would they be returned to incarceration if they later choose to no longer participate?</p>	<p>See ll. 75-77. We changed District Manager (DM) to Program Supervisor.</p> <p>Thanks. We added to the form.</p> <p>Legal gave us this language so we will keep it.</p> <p>Thanks. We added a statement if this occurs.</p>
<p>It seems to me the wording does not address our out of state population at all.</p> <p>2. Review/Referral Process</p> <p>(current) a. At the 'one year or six months until projected release date' Case Management review, the case co-managers may identify an offender to be considered for participation on a COSA team if the offender meets the above criteria and expresses an interest in participation.</p> <p>(current) f. If preliminarily approved, three (3) to six (6) months prior to an offender's anticipated release, the PO will refer the case to the Community Partner, which will provide a COSA Team, in the community where the offender will reside upon release. The PO will provide the Community Partner with a copy of the signed <i>VT DOC Acknowledgment and Waiver of Limits of Confidentiality Form</i> and a</p>	<p>Thanks. We added a statement that this includes OOS offenders.</p>

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<p>copy of the <i>COSA Case Summary Form</i>.</p> <p>(my 2cents worth) These timelines don't make sense. Shouldn't a. be: at the one (1) year before projected release date (PRD), the co-managers may identify an offender to be considered for participation on a COSA team, if the offender meets the above criteria and expresses an interest in participation.</p> <p>(my 2 cents worth) I think this should begin at the six (6) month mark COSA takes months and months to get help with and if they started at a year from PRD wouldn't that help with the hold up?</p> <p>3. Acceptance Process (again my 2 cents worth)</p> <ul style="list-style-type: none"> a. How is a staff member from the community partner going to meet with the out of state offenders? b. Same c. Not clear – who is making the referral – the PO or the CSS? If it is the PO, why? We have the offender out of state. h. Should be something mentioned, to include the out of state offenders when they return in state <p>I feel like the Out of State Unit is forgotten here.</p>	<p>There is no reason the offender can't be identified at the 1-year mark.</p> <p>We took out three months. Good point.</p> <p>They can do at one year.</p> <ul style="list-style-type: none"> a. They can do by phone. The Caseworker will assist. b. Same as above. c. The PO. The OOS Caseworker refers the offender to the PO. <p>That would happen for OOS offenders when they returned to VT.</p> <p>Thanks for bringing this up.</p>
<p>I think we should add the offender to this larger group meeting in addition to the PO, family members, landlords...j.</p> <p>Every six (6) to eight (8) weeks, staff from the Community Partner will organize a larger group meeting that includes the Offender, PO, family members, landlords, and any one else who has significant involvement with the offender's re-entry. The purpose of this meeting is to share information, identify goals and address concerns.</p>	<p>Thanks. We added.</p>

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<p>The way COSA referrals work now, the facility caseworker handles the application process to the COSA (with the PO’s support). It seems like having the PO be the point person for submitting the application, coordinating what the COSA needs for information (which they will need to get from the caseworker), interviews (which will need to be coordinated with the caseworker), etc., will add another middleman to the process and make it less efficient. From my casework perspective, this will make things more difficult and time consuming, for both the PO and caseworker.</p>	<p>Since these services will happen in the community, the PO needs to take the lead. But it should always be a case co-management process with the facility Caseworker.</p>
<p>We welcome these guidelines.</p> <p>In line 107, we suggest that the wording be changed to: "the volunteers can (or may) also provide informal outreach to the offender...."</p> <p>These are volunteers. Some CoSA groups are able to provide additional services such as transportation, etc. and some cannot or should not. The words "can" or "may" at least imply that permission and advice will be sought first about the activity or outreach.</p> <p>Subtle, but a world of difference.</p>	<p>We changed to “may”. Thanks.</p>
<p>2. f. lines 78-82</p> <p>Proposed change: line 79 "PO will refer the case to the Community Partner, who may consider providing a COSA team, in the community where the offender will reside upon release."</p> <p>3. c. lines 88-89</p> <p>Proposed change: "upon reviewing the case summary and meeting with the offender, the Community Partner will determine whether or not to present the case for approval by a community panel."</p> <p>3. d. lines 90-91</p> <p>Question: What is adequate? Who determines if the explanation for</p>	<p>We changed. Thanks.</p> <p>We will leave as is. We feel each Community Partner may have a slightly different acceptance process, and we don’t want to be that specific in the directive.</p>

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<p>declining is adequate? What if it is not adequate?</p> <p>3. e. lines 92 to 95</p> <p>Proposed change: "If the case is accepted, the community partner, doc and a panel of community clinicians will meet to assess the core members needs and develop strategies regarding housing, employment, community, sex offender treatment, substance abuse, mental health, family support and other important matters including victim impact."</p> <p>3. i. lines 106 to 107</p> <p>Addition: "In addition to weekly meetings, the volunteers will also provide informal outreach to the offender as deemed appropriate by the COSA team and PO."</p> <p>3. l. line 119-122</p> <p>Question: Does the funding stop if a Community partner assess to continue on with a COSA client and DOC decides oversight is not necessary?</p>	<p>Good point. We removed the word "adequate".</p> <p>We reworded and added, "in collaboration with the PO." We don't feel that clinicians need to be there, as the supervision plan developed for the offender has already listed mental health/treatment needs.</p> <p>We added.</p> <p>DOC funding is intended to compensate the community partner for the preparation and subsequent operation of a CoSA for a period of one year. Should the core member and CoSA volunteers be inclined to continue meeting after this point, it will not necessarily be supported through additional DOC funding.</p>
<p>Re: Section 3. J. Suggest title "Community Accountability Team" or CAT team:</p> <p><i>Section 3. J. Every six (6) to eight (8) weeks, staff from the Community Partner will organize a larger group meeting that includes the PO, family members, landlords, and any one else who has significant involvement with the offender's re-entry. The purpose of this meeting is to share information, identify goals and address concerns.</i></p> <p>This provision goes beyond the COSA team function in that it includes community members in a manner that imitates the original Mennonite Community behavior of intensive community-wide interest in the progress of an individual. The difference is that the original Mennonite model was based in part on the special emotional bonds of</p>	<p>We will consider some of your thoughts, but amending the directive would not take place until we had working experience with the procedures in this version. We will take a look at it one year after it goes into effect.</p>

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<p>the intentional religious community of Mennonites. Therefore, we are attempting to practice that deeper level of spiritual community commitment in ordinary towns where the economy and social expectations do not normally encourage such a high level of involvement of the community in the social and economic success of an individual.</p> <p>For this reason I suggest the additional practice of giving this group the formal name of <i>Community Accountability Team</i> together with the understanding that those who participate at this community level (with the Probation Officer) are claiming and pursuing a genuine interest in the social and economic success of the core member. The primary interest of this larger community group is to support clear compliance as the means to avoid failure. Attending to that primary interest is what the group will be doing when they "<i>share information, identify goals and address concerns.</i>"</p> <p>The <i>Community Accountability Team</i> is the fence between the offender and all others in the community who feel that the offender needs to be enclosed by a social buffer when the prison walls are removed.</p> <p>General comment on this policy:</p> <p>When community members object to release of offenders into the community, an appropriate response, stated in polite language, would be along the following lines:</p> <p>"The COSA program is supported by the Vermont Legislature. I/we would be glad to discuss why it is viewed as the most practical course of action. If you prefer that such criminal offenders remain in prison for life, at public expense, please contact your elected representatives. We would like to have your support or comments on how to assure that this program is consistent with public safety."</p>	