

State of Iowa Department of Corrections

Policy and Procedures

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Responsibility: William Sperfslage, Sally Kreamer
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1. PURPOSE

The purpose of this policy is to establish procedures in the Iowa Department of Corrections (IDOC) and Community Based Corrections (CBC) to identify levels of separation for incarcerated individuals/clients/staff when necessary to enhance safety and security and assist in transfer and housing decisions.

2. POLICY

It is the policy of IDOC and CBC that all situations between two incarcerated individuals/clients or between an incarcerated individual/client and a staff member that warrants a level of separation of the two individuals are monitored and reviewed on a regular basis. These reviews shall occur annually or any time relevant information becomes available.

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3. DEFINITIONS

- A. Classification - A comprehensive process of assessment, placement, and management designed to optimize public safety, allow the most efficient use of correctional resources, insure safe and orderly operations, and address incarcerated individual/client needs.
- B. Classification Team - The local decision-makers responsible for classifying incarcerated individuals/clients. This shall include, at a minimum, a Case Manager and a supervisory-level staff member.
- C. STG Intelligence Officer (STG IO) - A staff member recommended by the Warden/District Director to monitor Security Threat Group or STG activities.
- D. See IDOC Policy **AD-GA-16** for additional Definitions.

4. PROCEDURES

A. Identification

1. Each incarcerated individual/client entering an IDOC or CBC facility shall be given the opportunity to name other incarcerated individuals/clients who may potentially pose a risk to the individual while housed in an institution or residential facility.
2. An incarcerated individual/client may at any time report an event or situation which could potentially pose a risk to the individual while housed in an institution or residential facility.
3. Staff who becomes aware of an event or situation between two incarcerated individuals/clients that may potentially pose a risk to the

individuals while housed in an institution or residential facility shall report that information to appropriate staff as established per local procedures.

4. A staff member shall report a Keep Separate situation between the staff member and an incarcerated individual/client if they or a member of their immediate family are a direct victim of a crime committed by the incarcerated individual/client or are a party to a non-IDOC/CBC criminal or civil legal action involving the incarcerated individual/client as a plaintiff or defendant. This does not include cases in which staff may have been a victim of a crime or involved in legal action during the scope of their IDOC/CBC duties. Exceptions must be made by the Deputy Director of Institution Operations/Designee. A Staff Keep Separate may also be approved if the incarcerated individual/client is an immediate family member of the staff member, the staff member requests the Keep Separate and the staff member would have direct contact with the incarcerated individuals/client. The names of staff shall be confidential.
5. Access to the Keep Separates module in ICON shall only be granted on an as needed basis as determined by local authority in each institution or district and per DOC ICON policy.

B. Investigation

1. Staff shall ensure that investigations of potential Keep Separate situations reported to them are conducted per local procedures in order to determine the validity of the information presented and the level of risk as well as any level of separation needed.
2. Information provided by an incarcerated individual/client must be specific and contain names, places, dates, and reasons why the individuals should be separated from one another.
3. Staff shall consider ulterior motives on the part of the incarcerated individual/client for requesting a level of separation/Keep Separate action. It is recognized that offenders manipulate the Keep Separate system to obtain transfers or otherwise benefit themselves or other offenders.
4. In situations involving STG Keep Separates, a STG IO must complete the investigation and/or at minimum be consulted.

C. Keep Separate Types

1. Incarcerated individual/client - Situations between one incarcerated individual/client and another incarcerated individual/client that result in hostility, which may cause one or both of the individuals to harm the other or cause disruption to the operation of the facility if there is not a level of separation. These situations may or may not result in a level of separation; however, staff awareness and documentation is deemed necessary to assist in transfer and housing decisions.
2. Staff - A situation between a staff person and an incarcerated individual/client that requires that the incarcerated individual/client not be housed in the same facility where the staff person works. Keep Separates regarding staff shall be designated confidential by the Deputy Director of Institution Operations/Designee unless otherwise advised. Information regarding staff shall be restricted and any investigation in such matters shall be conducted by management/administration.
3. STG - Situations involving incarcerated individuals/clients where there is documented affiliation with Security Threat Groups (STG) activity/rivalry/discourse, which may cause disruption to the facility and/or staff awareness and documentation is deemed necessary to assist in transfer and housing decisions. This type of Keep Separates shall only be entered upon review by an STG Intelligence Officer and may be designated as confidential.

D. Determine Level of Separation

Each incarcerated individual/client Keep Separate record shall indicate the level of separation needed based on the risk presented and the information available. Staff should use professional judgment in evaluating the truthfulness of the incarcerated individual/client's claim as staff is not required to enter all keep separate situations claimed by an incarcerated individual/client.

1. Facility Level of Separation
 - a. This level of separation implies the individuals should not come into contact with each other; therefore, the incarcerated individual/client should not be housed in the same facility/general population where the other incarcerated individual/client is housed or where the identified staff Keep Separate is employed. Any exceptions must be approved by the Deputy Director of Institution Operations/Designee.

- b. This level of separation should not be indicated for situational events where hostilities are likely to subside once the presenting conflict has resolved.
- c. Should not be indicated unless there is substantial evidence to support this level of separation.

2. Local Level of Separation

- a. This level of separation implies the local housing facility will determine the level of separation necessary which may include: living quarters, work areas, and any consideration that must be given to other activities as applicable.
- b. Any contact should be closely evaluated by staff as there is reason to believe some consideration in association should be made.
- c. Use this for temporary/situational events or short-term hostility.

E. Approvals

A Keep Separate status and level of separation is not final until it has been reviewed and approved by the Deputy Director of Institution Operations/Designee.

F. Reviews

The Classification Team or other designated authority as established per local procedures shall review all Keep Separate designations at least annually and when new information becomes available to determine if the designation is still valid.

- 1. Such reviews shall be documented in the specified Review section of the Keep Separate screen in ICON.
- 2. If upon review, there is a recommendation for a change to the previously approved Keep Separate Type or Level of Separation, recommendation shall be forwarded to the Deputy Director of Institution Operations/Designee requesting additional review.

3. The Deputy Director of Institution Operations/Designee shall review all requests for termination of the Keep Separate Status and, if appropriate, end the status.

G. Removal

When the Classification Team/Designee determines that the Keep Separate status should no longer apply, they shall forward a recommendation to the Deputy Director of Institution Operations/Designee. Recommendations shall include all justification and documentation for removal of Keep Separate. The Deputy Director of Institution Operations/Designee shall review all requests for termination of the Keep Separate Status and, if appropriate, end the status.

H. Records

All Keep Separate records shall be maintained in the Iowa Corrections Offender Network (ICON) system.