



Chapter 2911 Advisory Committee 5-27-2025 Meeting Notes

Meeting began around 1:01 p.m. central time

Page-and-line numbers correspond with the [online rule draft](#), dated 12/3/2024.

1. Opening remarks from Commissioner Schnell.

- Commissioner Schnell thanked the committee and members of the public for their work on the rule
- He remarked that the department is attuned to concerns from affected parties but that the legislature has given the department a clear directive on improving the standards of confinement for incarcerated persons

2. Presentation from Rulemaking Manager.

- Next steps in the rulemaking process were discussed:
 - The department plans to continue working with the committee and affected parties throughout the summer and fall
 - The department anticipates publishing the rule by the end of the year
 - All affected parties and other members of the public will have the opportunity to formally comment on the proposed rules, including at a public hearing
 - The Office of Administrative Hearings is an independent state agency that will review the rule and determine whether the department has followed the legal requirements for adopting a rule

3. Staffing (2911.0900).

3.1 Subpart 1 (staffing plan and staffing analysis).

- **Line 14.23:** Committee members commented that “meet the needs of the population served by the facility” was too vague and that a facility’s population can change



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- **Lines 15.3 to 15.5:** A committee member commented that language on “meet the needs of the population served by the facility” was vague
- **Lines 15.6 to 15.8:** Some of the language was considered unnecessary because a facility is already being required to submit the staffing plan to the DOC Portal
- **Lines 15.9 to 15.16:** Several committee members remarked that facilities don’t typically do a staffing analysis every year and that they can be time intensive (up to 6 weeks); they also questioned why the analysis must be done through the DOC Portal and that other tools could be valuable

3.2 Subparts 12 and 14 (custody-dispatcher position).

- The [revised language](#) for subpart 14 was discussed, including the difficulty for small facilities to recruit and hire correctional staff
- One committee member said that the term “dispatcher” may be obsolete and that facilities use other terms to describe the profession

3.3 Subpart 15 (staffing ratios).

- **Lines 16.4 to 16.5:** A committee member discussed the proposed definition of “direct supervision” and stated that the definition should be revised
- The committee discussed adding in rule a direct-supervision ratio for lockdowns, and a ratio of 1 custody staff to 120 incarcerated persons was proposed
- **Lines 17.5 to 17.7:** Committee members discussed how each facility is different and that custody staff may be trained to perform multiple jobs in the facility; a committee member questioned what “assigned post” meant
- The committee discussed whether to delete lines **17.13 to 17.16** on staffing-related variance requests

3.4 Subpart 17 (admissions staff).

- Several committee members questioned how the department determined the proposed numbers for booking staff (at least one admissions staff member per 2,000 admissions per year)
- Some facilities were concerned that a minimum staff requirement could affect their budgetary negotiations with the county and potentially result in less funding
- Facilities also remarked that mass arrests or other events could inflate admissions numbers

- A committee member asked about the definition of admissions and whether the proposed numbers would apply to “catch and release” detainees

3.5 Other comments.

- **Line 18.16:** Committee members discussed whether the rule should differentiate between multifloor facilities and tiers
- A committee member wondered if the planned closure of Stillwater Prison will affect jails and proposed rule revisions

4. Public comments.

- Several commenters echoed concerns from the committee on the discussed topics on proposed admission requirements and custody staff excluded from the staffing ratios

5. Next meeting.

- No more public meetings are scheduled

The meeting ended around 2:29 p.m. central time

Attendees

Advisory committee: Rick Hodsdon, Pat O’Malley, Shawn Larsen, Margaret Zadra, Andrew Larson, Linda Wolford, Pat Eliassen, Elliot Butay, Eren Sutherland, Michele McKenzie

Members of the public: Around 60 people