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CC: Kyle Kaminski, MDOC Legislative Liaison, KaminskiK@michigan.gov
Re: RFS #171-250000002079 - MDOC Inmate Network, Applications & Services
Date: June 2, 2025

Michigan Collaborative to End Mass Incarceration (MI-CEMI), a network of over 100 advocates, advocacy organizations, service providers, faith communities, and other partner organizations is grateful for the opportunity to comment on RFS #171-250000002079 regarding Network, Applications & Services at MDOC facilities.

A successful and rehabilitation-focused implementation of this RFS has tremendous potential to improve connections and communication between incarcerated people and their loved ones, expand access to educational opportunities, increase healthcare access, and reduce financial burdens on incarcerated people and their families. These benefits would **improve rehabilitative outcomes, strengthen families, improve the economic positions of the families of incarcerated people (who tend to be among the most financially precarious of all Michiganders), and improve safety both in facilities and in the community.**

This is a complex and high-stakes request for solutions. To support successful implementation that meets the needs of all stakeholders, we offer the following recommendations:

1. Include broad stakeholder feedback throughout the procurement process.
2. Ensure that service contracts are not extractive for end users — incarcerated people and their families.
3. Ensure application and device deployment prioritizes education and digital literacy.
4. Create end-user-focused accountability metrics and renewal qualifications.
5. Ensure strong protections for end user privacy.

Recommendation 1: Include Broad Stakeholder Feedback Throughout the Procurement Process

DTMB and MDOC should include a broad range of stakeholder input as they scope the projects, evaluate bidders, clarify deliverables, and monitor performance.

A non-exhaustive list of stakeholders to engage includes:

- **People incarcerated at MDOC:** This RFS touches many parts of incarcerated people's lives, including their access to multimedia products, phone and video calls, financial transactions, store services, educational services and more. As incarcerated people are the end-users of many of these services, it is impossible to design a system that meets their needs without substantive engagement with them during the design and implementation process. They can help ensure, for example, that a proposed solution will work for the varied levels of digital literacy and reading proficiency within prisons.
- **Families and loved ones of incarcerated people:** families of incarcerated people use many of the services listed in the RFS. They are the ones on the other side of the phone call or video visit. They are the ones wrestling with the technology interfaces to schedule a visit and paying the fees to put money on a loved one's account. They are key constituents, and the procurement process should directly engage their voices.
- **Education and programming providers:** From MiCHEP Consortium members to PCAP artists, 3rd party programming providers are important partners to provide programming that helps incarcerated people do their time well and prepare for reentry. MDOC and DTMB should actively consult with them in the selection process for Educational Services (ES) and other solutions that affect programming access.
- **Service providers:** Legal, educational, and other service providers have valuable insight to ensure that the proposed solutions meet the needs of their constituencies. For example, Disability Rights Michigan will have important insight into ensuring that technology solutions are accessible to incarcerated people with a variety of disabilities. Attorneys such as those at SADO, CDAM, and the Prisons and Corrections Section of the State Bar will have valuable insights into the needs of attorneys and their clients.

Recommendation 2: Ensure That Service Contracts Are Not Extractive For End Users—Incarcerated People And Their Families.

Incarcerated people and their families are among the most financially precarious in Michigan, and services in this RFS should not exacerbate that vulnerability by allowing service providers to profiteer from captive users.

This recommendation is consistent with the boilerplate provision in the FY2025 budget, "MDOC must pursue all opportunities to reduce costs for prisoners and their families of financial deposit fees, commissary fees, and medical copays when the department negotiates or renews contracts for these services."

As this relates to specific elements of the RFS:

- **Phone calls, video visits, and email:** Given the significant public good from maintaining contact between incarcerated people and their loved ones, we support removing cost and other barriers to communication between incarcerated people and their loved ones. Ideally, final contracts for these services should remove all end-user fees. Short of that, end user fees should be as low as possible.
- **Multimedia cost:** Incarcerated people pay higher per-unit costs for multimedia content such as songs, games, and videos than to non-incarcerated users. Under this RFS, agreements should seek to eliminate this cost disparity.
- **Store Services (SS) transaction costs:** The families of incarcerated people, many of whom are economically vulnerable to begin with, pay significant costs putting funds on prison accounts so their loved ones have access to commissary and communications, a burden that is exacerbated by the transaction costs to add funds to these accounts. Providers selected to deliver Store Services (SS) and related activities should minimize the transaction costs to families, especially for the low-dollar transactions common among those who are most financially vulnerable.

Recommendation 3: Ensure Application And Device Deployment Prioritizes Education And Digital Literacy

Two of the most common pieces of feedback we hear from formerly incarcerated people about their reentry preparedness are “We should have had more programming opportunities earlier in our incarceration,” and “We were not prepared with the digital literacy skills needed for society today.”

This RFS has the potential to address both problems by using technology as a “force multiplier” for programming access and digital skills learning, but the app, device, and network services must be designed to achieve these goals. We recommend:

- **Provide application access that helps incarcerated people practice the real-world technology skills they will need to succeed post incarceration.** Given the wide range of technology platforms used in the modern employment world (e.g. Google and Microsoft-based office applications, multiple video call platforms) and the broad range of functions available in these applications, it is important that incarcerated people have access to a variety of applications and the ability to explore a broad range of functions of these tools. Fundamentally, all people need to learn how to learn to use the programs, and that requires exploration beyond what can be taught in a rigid tutorial setting. Simple things such as learning how to export a Google Doc to a PDF are important skills for job seekers, but excessively regimented and locked down

application access and instruction prevents the kind of exploration that allows someone to figure out how to face novel challenges such as this.

- **Provide broad and current digital content access.** The Pell Grant Expansion process calls for the educational experience of incarcerated students to mimic as closely as possible that of traditional students. This requires the ability to conduct academic research and cite relevant journal articles. This RFS is an opportunity to ensure that incarcerated people (especially college students) can access the academic resources necessary to gain the knowledge and skills necessary for the modern workforce.
- **Ensure scenario-appropriate device access.** We appreciate that the RFS mentions both tablets and laptops. There are use cases for both types of devices and both should be included in the delivery plan for different scenarios. For example, laptops are appropriate for students involved in college classes. Tablets provide an easier-to-use interface that may be more accessible to people with lower literacy levels. .

Recommendation 4: Create End-User-Focused Accountability Metrics and Renewal Qualifications

The RFS seeks solution providers for “3 Base Years with 7, 1-Year Options.” If a provider is offering high-quality services, we see the value of straightforward one-year extensions, but all stakeholders need to have a role in assessing service quality. A provider may offer a product that meets the cost priorities of OMTB and the security needs of MDOC, but that is not accessible to people with disabilities, passes on excessive costs to families, or has an interface that many incarcerated users struggle to navigate.

To ensure that solutions are working for *all* stakeholders prior to contract renewals, the stakeholder involvement process identified in Recommendation 1 should lead to the creation of a balanced set of deliverables that address the needs of *all* constituencies. These deliverables should be included as metrics in the contract renewal process. Furthermore, representative voices from the different stakeholder communities should be included in the renewal process.

Recommendation 5: Ensure Strong Protections For End User Privacy

In a world where all of our digital actions are tracked, privacy advocates have raised concerns that data brokers may harvest information gleaned from incarcerated individuals and their families. Given the captive audience nature of the end users in this system, DTMB should require strong privacy protections for these services that limit the transmission of data to 3rd parties, similar to those used by K-12 education institutions to protect the privacy of minor students.