

COMMISSION ON ACCREDITATION FOR CORRECTIONS

STANDARDS COMPLIANCE REACCREDITATION AUDIT

**Montgomery County Department of Correction and Rehabilitation
Montgomery County Pre-Release and Re-Entry Services
Rockville, Maryland**

June 6 - 7, 2019

VISITING COMMITTEE MEMBERS

**Joel W. Davis, Chairperson
ACA Auditor**

**James Capillo
ACA Auditor**

A. Introduction

The audit of the Montgomery County Department of Correction and Rehabilitation (DOCR), Montgomery County Pre-Release and Reentry Services (PRRS) in Rockville, Maryland was conducted on June 5-7, 2019, by the following team: Joel W. Davis, Chairperson and James Capillo, Member.

B. Facility Demographics

Rated Capacity: 144

Actual Population: 103 (98 male & 5 female)

Home Confinement Rated Capacity/ Actual: 45/4

Average Daily Population for the last 12 months: 113

Average Length of Stay: 2-3 months

Security/Custody Level: Minimum

Age Range of Offenders: 18-75

Gender: Male and Female

Full-Time Staff: 59.5

4 Administrative 6 Support, 15 Program, 28 Security, 7 Other

C. Facility Description

The PRRS Division of DOCR oversees the 144-bed Montgomery County Pre-Release Center (PRC) and provides evidenced-based transitional services to soon-to-be released sentenced and incarcerated adults from the county's two detention centers, drug court and from state and federal prisons who are returning to Montgomery County and the larger Washington metropolitan area. PRC was built in 1978 and is located at 11651 Nebel Street, Rockville, Maryland, offers structured community-based services for residents. Rockville is located in the rapidly growing White Flint area and its proximity to jobs and transportation makes it an ideal site for the work release component of the program.

In the 1990s, PRRS also developed a "Home Confinement" program which allows the monitoring of clients using electronic technology (e.g. GPS) in their homes. In 2005 the re-entry program was consolidated with the pre-release program. Participants are released from incarceration with employment, treatment, family support, and saves taxpayer money by reduces institutional crowding, and reduces recidivism and victimization rates.

PRC is a two-story brick building with approximately 55,000 square feet and is divided into three male housing units, one female housing unit, a new kitchen and dining area, support services offices, and administrative office areas. The housing units have primarily two or three-person rooms and a few single rooms. A bathroom is located between every two rooms. In Unit 1, which houses a total of 14 female residents have a single bathroom per room. Lounge/visiting areas, patio, desk areas, and a laundry room are part of each unit. Staff offices are located within each unit. Resident Supervisors provide 24/7 security coverage of the living units, as well as the Front Desk post. The central areas consist of group rooms and classrooms, a Career Resource Center, and space for medical services.

The facility has undergone several major renovations during the audit period. The administrative area and front lobby were reconfigured to provide a new front desk and open space for staff by removing a wall and remodeling the area behind the desk. In 2017, the Montgomery County Department of Correction and Rehabilitation Pre-Trial Services programs were relocated into the Pre-Release Center. The former female housing Unit I was converted into staff office space, a client waiting area, and urine collection lab. Male Housing Unit II was renovated to create a separate 13 bed female housing unit, a 33-bed male housing unit as well adding staff office space. In addition, the facility completed a full roof replacement, and this was completed in November 2017. It was observed that during the renovations, staff-maintained security and order, during the daily operations.

The construction for the Pre-Release Center Dietary Kitchen Project began August 2018. The renovation included the construction of the kitchen to extend the cafeteria size, provide a new staff lounge, residents bathrooms that are adjacent to kitchen, and the purchase of all new kitchen appliances and equipment. An additional modular classroom was added to the courtyard area, for staff and resident classes, meetings, and programs. Phase III of

ADA remediation upgrades will include female and male housing rooms, a new health unit and restroom, accessible ramps for Unit I female unit and Unit IV male unit, signage, as well as other Center upgrades. An extension of the facility parking lot for staff and visitors was completed in May 2019 and added 21 new parking spaces for staff, visitors, and volunteers.

The facility is equipped with a handicap-accessible room, wheelchair ramps, and designated handicap parking spaces. The landscaped grounds include picnic tables for visiting, a basketball court, and off-street parking for resident and staff vehicles.

PRRS carefully screens and accepts only those individuals that it assesses can be legally and safely managed in a community setting. By law, all participants must have one year or less time remaining on their sentences, and PRRS is authorized to determine eligibility for Pre-Release status but must receive judicial consent for the actual placement of the individual at the Pre-Release Center. The program primarily serves those who are sentenced to the DOCR for 18 months or less and who are within one year of their projected release date. It also has contracts with state and federal correctional systems to provide reentry services to their prisoners who are returning to this area and who are within 6 months of release and accepts residents from Drug court. Thus, PRRS serves individuals convicted of all offense types serving sentences ranging from ten (10) days to 30 years with the one exception of excluding from eligibility those convicted of recent escape.

PRRS requires program participants to work, pay room and board, file state and federal taxes, and address restitution and child support obligations. Each client works with a case manager and work release coordinator to develop an individualized reentry plan that addresses their specific transitional needs including employment, housing, treatment, family and medical services. Whenever possible, family members of participants are encouraged to participate in the development of the plan. The program employs other evidenced-based reentry practices including risk/needs assessments, cognitive behavioral programming, monitored community-based treatment, college/GED/Literacy classes, and a “work first” philosophy.

The Pre-Release and Reentry Services Level System consists of four levels after of an initial intake, orientation and assessment period. Residents receive additional privileges after each Level has successfully been completed.

The Mission of the PRC is to provide community residential and non-residential alternatives to secure confinement for adult residents and to provide reentry services while maintaining community safety

D. Pre-Audit Meeting

The team met on June 2, 2019, in Gaithersburg, MD, to discuss the information provided by the Association staff and the officials from PRRS.

The chairperson divided standards into the following groups:

Standards # 4-ACRS 1A-01 through 4-ACRS 5A-26 to Joel W. Davis, Chairperson.
Standards #4-ACRS 6A-01 through 4-ACRS 7F-10 to James Capillo, Member.

The audit team attended a “meet and greet” dinner at the Canyon Grill Restaurant in Gaithersburg, Maryland on Sunday, May 2, 2019, with Acting Director Angela Talley and key leadership staff members from PRRS, Montgomery County Correctional Facility and the Montgomery County Detention Center.

E. The Audit Process

1. Transportation

The team was escorted to the facility by Deputy Chief of Security and Facility Ivan Downing, Accreditation Manager.

2. Entrance Interview

The audit team was met and greeted in the lobby by Angela Talley, Acting DOCR Director and Ben Stevenson, Acting Division Chief. The team expressed the appreciation of the Association for the opportunity to be involved with PRRS in the accreditation process.

The audit team proceeded to the Blue Conference room where the formal entry meeting was held.

The following persons were in attendance:

Angela Talley, Acting Director DOCR
Ben Stevenson, Acting Division Chief
Ivan Downing, Deputy Chief of Security and Facilities
Anthony Sturgess, Health Services Administrator
Robin Russe, Food Service Manager
Tyrone Alexander, Reentry Services Manager
Robin White, RN Nurse Manager
Gail David, Deputy Warden of Operations
Farha Mowlanu, PRRS Therapist

Amanda Roberts, Work Release Coordinator
Lisa Dawson, Case Manager
Madhuka Lee, Principle Administrative Aide (PAA)
Bernita Johnson, Manager Welcome Home Program

It was explained that the goal of the visiting team was to be as helpful and nonintrusive as possible during the conduct of the audit. The chairperson emphasized the goals of accreditation toward the efficiency and effectiveness of correctional systems throughout the United States. The audit schedule was also discussed at this time.

3. Facility Tour

The team toured the entire facility on June 5, 2019 1:00pm. to 3:00pm. The following persons accompanied the team on the tour and responded to the team's questions concerning facility operations:

Ben Stevenson, Deputy Chief Program Services
Ivan Downing, Resident Supervisor III
Tyrone Alexander, Reentry Services Manager

There were notices posted throughout the facility announcing the upcoming ACA audit.

4. Conditions of Confinement/Quality of Life

During the tour, the team evaluated the conditions of confinement at the facility. The following narrative description of the relevant programmatic services and functional areas summarizes the findings regarding the quality of life.

Security:

PRRS maintains security measures appropriate for a community residential facility. Security staff controls the main entrance to the building. Visitors to PRC must sign in and out, show proper identification and given a visitor badge to wear, and have personal belongings searched. In 2016, a Cellsense™ metal detector was installed in the front desk area and all incoming visitors must walk through the metal detector. A hand-held metal detector is also used on visitors, if a person cannot clear the metal detector. All visitor cell phones and personal effects are stored in lockable lockers in the front area vestibule.

Residents are signed in and out from their living unit by the Resident Supervisor. All residents are given a breathalyzer test before leaving and after returning to the facility and are randomly drug tested. Additionally, PRRS always holds clients

accountable for their location, and residents only access the community with pre-approval. There is a zero- tolerance policy about engaging in criminal activity, possessing drugs and alcohol or weapons, and accessing the community at locations and times that have not been approved. Individuals found in violation of such policies are immediately returned to secure detention. The few escapes occur each year and each case is charged criminally and vigorously prosecuted. Most of the escapes involve individuals who were approved to leave the facility for work or community treatment and fail to return to the facility as scheduled. All escapees in the program's 45-year history have been apprehended and most are returned to custody within 48 hours.

A key control system is in place at PRC including key watcher boxes. There are six formal counts during the 24-hour period. There are 32 cameras strategically placed within the facility and monitored primarily in the Resident Supervisor III Office, however they can be monitored from any computer at the facility. All outside doors are tied to a system in the control center to alert staff of any egress from unauthorized doors.

Tools were inventoried and stored properly. Two generators provide backup power for emergency lighting and outlets.

Environmental Conditions:

Lighting, noise, and air circulation meet acceptable standards. The facility conforms to the all applicable building codes. The temperature was comfortable in all parts of the building. At the time of the audit, renovation of the building was in process. A new boiler system has been installed, as well a remodeling to relocate the Pre-Trial Services Unit into the building. During the visit, all construction activity was strictly controlled and organized, with minimal disruption to the ongoing operation of the programs.

Sanitation:

PRC is very clean, and it is the responsibility of all residents under staff supervision to maintain the cleanliness of the facility. A daily clean-up assignment roster is posted on each unit's bulletin board. All clean-up assignments are inspected and rated. Cleaning products are issued to the living units from the central chemical room.

Residents are expected to maintain their rooms in a clean and orderly fashion. Room inspections are made daily and are also rated. A facility wide clean- up is schedule on a Saturday once a month.

PRRS utilizes public water and sewer service. Contracts are in place for trash, recycling material removal, and termite/pest management.

Fire Safety:

There are six (6) staff members who are fire safety certified by the Maryland Police and Correctional Training Commission and are responsible for conducting in-house fire inspections. The Montgomery County Fire Marshall conducts an annual fire safety inspection. PRRS has emergency plans, including evacuation plans, which have been shared and approved by local authorities.

Fire drills are conducted as required, fire extinguishers inspections were current, and evacuation routes were posted. The fire alarm system which includes smoke detectors, strobe lights, and pull stations, is a direct feed to the Rockville Fire Department and notifies them automatically when the alarm is sounded. The entire facility is sprinkled.

Flammable chemicals were stored and controlled properly. MSDS were present on all chemicals. PRC has been a smoke free facility since 2007.

Food Service:

Food service is staffed by four officers and is supervised by a DOCR food service manager. Three to six residents per meal are assigned to food service and they are medically screened before assignment and are given proper training to work in the kitchen. Religious and medical diets can be approved.

Meals hours are:

Breakfast: 5:00 a.m. to 7:00 a.m. (Monday-Friday)
5:00 a.m. to 8:00 a.m. (Saturday, Sunday) Lunch:
12:00 p.m. to 1:30 p.m.
Dinner: 5:00 p.m. to 7:00 p.m.

Saved meals and bag lunches are available as needed by signing a roster for these. The audit team ate the lunch meal on the first day. The food was tasty and of ample portion.

Medical Care:

The health authority is the Health Services Administrator of DOCR. Medical staff at PRC consists of one full time Registered Nurse that is on-site 40 hours per week Monday thru Friday. The nurse maintains a crash-bag. The AED is located at the lobby security desk. All staff is trained in CPR and first aid. There are contracts in

place with a local ambulance service and hospital for emergency services. After hours and weekend medical concerns are handled by two local and nearby jail facilities in Montgomery County. The medical doctor and mental health specialist are both on-site one day per week. There is limited vision and dental care provided at Montgomery County Correctional Facility.

Offenders may have keep on person medications. All other medications are dispensed by the Resident Supervisor and it is the resident's responsibility to advise staff persons when it is time for that medication. The contract for pharmaceuticals is with Correct RX Pharmacy Services, Inc.

Residents may be charged a fee of \$4.00 for sick call visits, unless the visit is for one of the following reasons: routine intake process, initial physical examination, routine health assessment initiated by staff, visit due to referral by staff, continuing care or follow-up, visits that result in hospital or emergency room visits, chronic care, and secondary care.

Recreation:

There is a dayroom on each unit with a television and tables for board games. The outdoor recreation area has a basketball court with a small track for walking and jogging. Passes can be given to residents to go to local gyms. Residents may request permission from their case manager to have a pre-paid cell phone. It should be noted that during the audit inspection, the recreation area was not able for residents to use. Staff members set up alternative work-out equipment for residents in their housing units and allowed additional residents to attend outside leisure activities during the recreational yard construction.

Religious Programming:

The only on-site programming is a bible study conducted by volunteers. When a resident earns community passes he/she may attend the church of their choice in the community. The audit team was advised that one local church will transport residents to and from their church service. All staff receives one hour of annual training in religious programs.

Offender Work Programs

Resident work assignments at PRC include grounds upkeep, janitorial, food service, and maintenance. Residents are paid \$2.00 per day for these work assignments. They can also earn five (5) to ten (10) "Good Conduct" days for every 30 days worked.

Work release is the major component of this program. The expectation is that all residents will find jobs within five weeks of admission. Residents are to find jobs themselves. The Work Release Coordinators and Case Managers assist residents find and secure jobs and contact the employer in the community to ensure appropriate job matches and to make them aware of the resident's offenses. They also provide job readiness assistance and manage a Career Resource Center that includes 19 internet capable computers. Unemployed residents must attend a morning meeting held at 8:00 a.m.

Once employed residents are required to have 10% of their earnings go into their institutional savings account for use upon release and 20% of their gross income goes to room and board (10% of gross income if on Home Confinement). At the time of the audit 74 residents out of 103 or (71%) residents were employed in the community.

Academic and Vocational Education:

PRRS offers a Digital Literacy course as well as Pre-GED and GED. Classes are offered four nights per week and are taught through collaboration with Montgomery College.

Program participants whose educational needs fall below the Pre-GED level are provided with volunteer tutors who work with the participant on an individual basis to increase their skills.

Program participants are referred to community services such as the Montgomery County Literacy Council and English as a Second Language programs offered throughout the County.

No vocational education is offered onsite. However, residents can take college classes or workforce development courses at Montgomery College.

Social Services:

On site-social services programs led by volunteers, academic interns and paid Community Correctional Interns include Twelve 12 Step Alcoholics Anonymous and Narcotics Anonymous meetings, Resume Writing assistance, Welcome Home Mentoring Program, Meditation, Mediation and Conflict Resolution, Bible Study Relapse Prevention group, Parenting classes, and Job Readiness and Mock Interviewing.

There are many community resources available in Montgomery County to the residents for twelve step meetings, mental health and substance abuse services, housing/shelter services, and employment assistance services.

Visitation:

Family visitation is part of the PRRS Program. Families and the support they provide play a very importance role in helping residents be successful once released. PRRS offers a family and friends support program. The sponsorship program provides an opportunity for family members and significant others to become a partner in the residents' reentry process. This is achieved in a number of ways including collaboration in the development of a resident's reentry plan, attendance in the sponsor support group, frequent and ongoing contact with the resident's Case Manager, referrals to appropriate community services, contact visiting, the home pass program and home confinement services.

Visiting hours at PRC are:

- Monday through Friday: 2:00 p.m. - 5:00 p.m. for employed residents only
- Monday through Friday: 7:00 p.m. - 9:00 p.m. for all residents
- Saturday/Sunday: 2:00 p.m. - 5:00 p.m. for all residents
- Saturday/Sunday: 7:00 p.m. - 9:00 p.m. for all residents

Residents and their visitors may visit outside in the courtyard or inside in the cafeteria or on the units.

Library Services:

There is not a library at PRC. When a resident earns, community passes he/she may go to the public library.

Laundry:

Each living unit contains washers and dryers, as well as irons and ironing boards. Employed residents are responsible for purchasing their own laundry detergent. The laundry cannot be used during unit quiet hours (11:00 p.m. until 7:00 a.m.).

F. Examination of Records

Following the facility tour, the team proceeded to the Conference room and watched a power point presentation of the programs' case management and re-entry services. After the presentation the audit team reviewed the accreditation files and evaluated compliance levels of the policies and procedures. The facility has zero notices of non-compliance with local, state, or federal laws or regulations.

1. Litigation

Over the last three years, the facility had no consent decrees, class action lawsuits or adverse judgments.

2. Significant Incidents/Outcome Measures

The significant incident summary represented no concerns regarding activities or management of PRRS.

The outcome measures also represented no concerns regarding activities or management of PRRS. The outcome measures did highlight significant results regarding the number of residents that successfully complete the program 80%, residents released with private sector employment 75% and residents released with a permanent housing plan 90%.

3. Departmental Visits

Team members visited the following departments to review conditions relating to departmental policy and operations:

<u>Department Visited</u>	<u>Person(s) Contacted</u>
Kitchen/Cafeteria	Kitchen Manager Robin Russe Dietary Officers Matthew Cioffi Dietary Officer Denise Attai Dietary Officers Simon Officers Aydin Ayal
Boiler Room	DCSF Ivan Downing
Career Resource Center	Resident Supervisor I Jadell Fox
Front Desk	Resident Supervisor I Funmiliyo Fapuro
Unit I & II	Resident Supervisor II Amnetty Marmolejos
Unit III	Resident Supervisor II Garrick Peterkin
Unit IV	Resident Supervisor II David Luu
Nurse Station	Sunday Aworanti

Accounting	Neelam Manocha/Sara Zue
GED Classroom	Ben Stevenson
Screening Assessment	Sylvia Hernandez/William Brown

4. Shifts

a) Day Shift

The audit team was present at the facility during the day shift, which starts at 7:00 a.m. and ends at 3:30 p.m. All shifts include a 30-minute pre-shift briefing. During the day-shift the audit team toured the facility, interviewed staff and residents and observed general operations and programs.

b.) Evening Shift

The evening shift starts at 3:00 p.m. and ends at 11:30 p.m. The audit team was present at the beginning of this shift and observed the shift briefing. Operations were observed and staff and residents were interviewed. Standards continued to be reviewed.

c.) Night Shift

The night shift starts at 11:00 p.m. and ends at 7:30 a.m. The audit team was present at the end of the shift briefing and were available for the midnight shift staff. The audit team observed operations and interviewed staff and residents.

5. Status of Previously Non-compliant Standards/Plans of Action

The team reviewed the status of standards previously found non-compliant, for which a waiver was not granted, and found the following:

Standard #4-ACRS-7B-06 was in compliance.

G. Interviews

During the audit, team members met with both staff and offenders to verify observations and/or to clarify questions concerning facility operations.

1. Offender Interviews

The team interviewed approximately 25 residents. All residents were very positive about the program, the staff and the overall conditions of confinement at the facility. Most expressed appreciation for the opportunity to participate in this program, and help from staff to address the behaviors that led to their current custody status. All stated they felt safe at the facility. There were compliments expressed about the quality of their food service. There were no consistent negative comments received.

2. Staff Interviews

The team interviewed approximately 30 employees. Staff indicated they felt there were good lines of communication with supervisors and management. All were very professional, courteous, positive and enthusiastic about their work. All felt safe in the workplace and felt they were adequately trained and prepared to do their job.

H. Exit Discussion

The exit interview was held at 11:00a.m. in the Blue Conference room with the Acting Director of DOCR Angela Talley, Acting Chief Ben Stevenson, Deputy Chief of Security and Facilities Ivan Downing and eight (8) staff in attendance. The following persons were also in attendance:

Anthony Sturgess, Health Services Administrator, DOCR
Robin White, Nurse Manager
Robin Russe, Food Service Manager, DOCR
Tyrone Alexander, Reentry Service Manager, PRRS
Sylvia Hernandez, Reentry Assessment Screener, PRRS
Amanda Roberts, Work Release Coordinator
William Brown, Work Release Coordinator
Vasshon McCall, Resident Supervisor III
Madhuka Lee, Principle Administrative Aide
Dominique Fontaine, Principle Administrative Aide

The chairperson explained the procedures that would follow the audit. The team discussed the compliance levels of the mandatory and non-mandatory standards and reviewed their individual findings with the group. The Chairperson congratulated the staff for the perfect score received.

The chairperson expressed appreciation for the cooperation of everyone concerned and congratulated the facility team for the progress made and encouraged them to continue to strive toward even further professionalism within the correctional field.

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COMPLIANCE TALLY

Manual Type	Adult Community Residential Services, 4 th Edition	
Supplement	2014 Standards Supplement	
Facility/Program	Montgomery County Pre-Release and Reentry Services	
Audit Dates	June 5 th -6 th , 2019	
Auditor(s)	Chairperson Joel W. Davis James Capillo, Member	
	MANDATORY	NON-MANDATORY
Number of Standards in Manual	32	218
Number Not Applicable	0	8
Number Applicable	32	210
Number Non-Compliance	0	0
Number in Compliance	32	210
Percentage (%) of Compliance	100%	100%

- ! Number of Standards minus Number of Not Applicable equals Number Applicable
- ! Number Applicable minus Number Non-Compliance equals Number Compliance
- ! Number Compliance divided by Number Applicable equals Percentage of Compliance

COMMISSION ON ACCREDITATION FOR CORRECTIONS

Montgomery County Department of Correction and Rehabilitation
 Montgomery County Pre-Release and Reentry Services
 Rockville, Maryland

June 5-7, 2019

Visiting Committee Findings

Non-Mandatory Standards

Not Applicable

Standard #4-ACRS-4C-14-1

WHERE NURSING INFANTS ARE ALLOWED TO REMAIN WITH THEIR MOTHERS, PROVISIONS ARE MADE FOR A NURSERY, STAFFED BY QUALIFIED PERSONS, WHERE THE INFANTS ARE PLACED WHEN THEY ARE NOT IN THE CARE OF THEIR MOTHERS.

FINDING

PRRS does not allow infants to remain with their mothers after their birth.

Standard #4-ACRS-5A-26

THE FACILITY'S LOCATION FACILITATES ACCESS TO AND THE USE OF COMMUNITY-BASED SERVICES, RESOURCES, AND PUBLIC TRANSPORTATION. [NEW CONSTRUCTION ONLY]

FINDING

PRRS is not new construction.

Standard #4-ACRS-6A-04-1

THE ASSIGNMENT OF APPROPRIATELY TRAINED INDIVIDUALS TO ASSIST DISABLED OFFENDERS WHO CANNOT OTHERWISE PERFORM BASIC LIFE FUNCTIONS IS PROVIDED.

FINDING

Residents who cannot perform basic life functions are not housed at this facility.

Standard #4-ACRS-7A-02

A SOLE PROPRIETOR OPERATING A FACILITY IS ABLE TO DOCUMENT THAT NECESSARY LEGAL MEASURES HAVE BEEN TAKEN TO PROVIDE CONTINUITY OF SERVICE IN THE EVENT OF BANKRUPTCY, INCAPACITATION, RETIREMENT, OR DEATH.

FINDING:

A sole proprietor is not operating this facility.

Standard #4-ACRS-7A-03

THE AGENCY SATISFIES PERIODIC FILING REQUIREMENTS NECESSARY TO MAINTAIN ITS LEGAL AUTHORITY TO CONTINUE OPERATIONS. (PRIVATE AGENCIES ONLY).

FINDING

PRRS is a government facility not a private agency.

Standard #4-ACRS-7A-04

AT A MINIMUM, THE BYLAWS FOR THE GOVERNING AUTHORITY OF THE AGENCY INCLUDE:

- MEMBERSHIP (TYPES, QUALIFICATIONS, COMMUNITY REPRESENTATION, RIGHTS, DUTIES)
- SIZE OF GOVERNING BODY
- METHOD OF SELECTION
- TERMS OF OFFICE
- DUTIES AND RESPONSIBILITIES OF OFFICERS
- TIMES AUTHORITY WILL MEET

- COMMITTEES
- PARLIAMENTARY PROCEDURES
- RECORDING OF MINUTES
- METHOD OF AMENDING THE BYLAWS
- CONFLICT OF INTEREST PROVISIONS
- QUORUM

FINDING

PRRS is a government agency and not a private agency.

Standard #4-ACRS-7D-29

WHERE A COMMISSARY OR CANTEEN IS OPERATED FOR OFFENDERS, CANTEEN FUNDS ARE AUDITED INDEPENDENTLY FOLLOWING STANDARD ACCOUNTING PROCEDURES. AN ANNUAL FINANCIAL STATUS REPORT IS AVAILABLE AS A PUBLIC DOCUMENT.

FINDING

A commissary or canteen is not operated for residents at PRRS.

Standard #4-ACRS-7D-30

ANY FINANCIAL TRANSACTIONS PERMITTED BETWEEN OFFENDERS, OFFENDERS AND STAFF, OR OFFENDERS AND VOLUNTEERS MUST BE APPROVED BY THE FACILITY ADMINISTRATOR.

FINDING

Financial transactions between offenders and staff, or offenders and volunteers are not allowed at PRRS.

