



U.S. Department of Justice

Office of Justice Programs

Office for Civil Rights

Washington, D.C. 20531

May 8, 2009

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Mr. Alan F. Miller
Grants/Contracts Supervisor
Idaho Department of Juvenile Corrections
754 West Jefferson
P.O. Box 83720
Boise, ID 83720-0285

Re: Compliance Review of the Idaho Department of Juvenile Corrections
(09-OCR-0113)

Dear Mr. Miller:

On June 18, 2007, the Office for Civil Rights (OCR), Office of Justice Programs (OJP), U.S. Department of Justice (DOJ) initiated a compliance review of all State Administering Agencies, including the Idaho Department of Juvenile Corrections (IDJC or Department), in accordance with federal regulation 28 C.F.R. § 42.206. The focus of the review was on IDJC's compliance with applicable federal civil rights laws along with IDJC's monitoring procedures for ensuring the compliance of subrecipients with these laws. Of particular interest to the OCR was IDJC's implementation and monitoring of DOJ's regulations, Equal Treatment for Faith-Based Organizations, 28 C.F.R. pt. 38 [hereinafter Equal Treatment Regulations].

On February 17, 2009, the OCR conducted an onsite visit to IDJC's offices in Boise, Idaho to interview IDJC representatives and to conduct a training program for pertinent IDJC management and program staff about the federal civil rights laws that the OCR enforces. The OCR would like to thank you for assisting OCR attorney Christopher Zubowicz during his onsite visit.

In regard to the limited scope of this compliance review, the OCR concludes that the IDJC appears to be taking measures to comply with the federal civil rights laws that the OCR enforces. Nonetheless, we have reservations about the adequacy of the Department's (1) guidance to subrecipients about their legal obligations regarding applicable federal civil rights laws, (2) onsite monitoring of subrecipients, (3) training and technical assistance for subrecipients, and (4) complaint procedures for responding to certain discrimination allegations. The following Compliance Review Report includes recommendations for improving IDJC's methods for

monitoring the civil rights compliance of subrecipients.

Compliance Review Report: Overview and Recommendations

I. Overview

This Compliance Review Report first examines IDJC's procedures for monitoring whether subrecipients are meeting their obligations to comply with the federal civil rights laws that are a condition for receiving federal financial assistance. The Report then focuses on the Department's implementation of DOJ's Equal Treatment Regulations.

A. General Monitoring Procedures to Ensure Subrecipient Compliance with Applicable Federal Civil Rights Laws

Recipients of federal financial assistance from the OJP are responsible for certifying that contractors and subrecipients under DOJ grant programs comply with applicable federal civil rights laws. In reviewing IDJC's general efforts to ensure subrecipients' compliance with their civil rights obligations, the OCR examined how the Department used the following four tools: (1) standard assurances; (2) onsite visits and other monitoring methods; (3) training programs and technical assistance; and (4) procedures for receiving, investigating, and resolving complaints alleging employment and services discrimination.

1. Standard Assurances

The OCR evaluated the standard assurances that the IDJC uses in connection with the following DOJ-funded programs: the Office of Juvenile Justice and Delinquency Prevention's (OJJDP) Title V Community Prevention Grants (Title V); the OJJDP's Title II Formula Grants (Title II), the OJJDP's Juvenile Accountability Block Grants (JABG), and the OJJDP's Enforcing the Underage Drinking Laws Block Grants (EUDL). The Department requires all applicants for these programs to sign a federal assurances document, which contains the following language regarding civil rights laws:

13. It will comply, and all its contractors will comply, with the non-discrimination requirements in the Omnibus Crime Control and Safe Streets Act of 1968, as amended, 42 USE [sic] 3789(c), or Victims of Crime Act (as appropriate); Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973, as amended; Subtitle A, Title II of the Americans with Disabilities Act (ADA) (1990); Title IX of the Education Amendments of 1972; the Age Discrimination Act of 1975; Department of Justice Non-Discrimination Regulations, 28 CFR Part 42,

Subparts C, D, E and G; and Department of Justice regulations on disability discrimination, 28 CFR Part 35 and Part 39.

14. In the event a Federal or State court or Federal or State administrative agency makes a finding of discrimination after a due process hearing on the grounds of race, color, religion, national origin, sex, or disability against a recipient of funds, the recipient will forward a copy of the finding to the Office for Civil Rights, Office of Justice Programs.
15. It will provide an Equal Employment Opportunity Program, if required to maintain one, where the application is for \$500,000 or more.

(Federal Assurances at ¶¶ 13-15.) If an applicant does not execute the federal assurances document, then the IDJC automatically eliminates it from further funding consideration.

Before it makes an award to a subrecipient, the IDJC also requires the subgrantee to sign a special conditions document, which, according to the Department, is designed to highlight issues of special concern and contains the following language regarding civil rights laws:¹

6. Recipient will comply with all provisions of the Juvenile Justice and Delinquency Prevention Act of 1974 as amended, with all applicable state, local and federal laws, and with the [sic] Title VI of the Civil Rights Act of 1964; Section 504 of the Rehabilitation Act of 1973 as amended; Title IX of the Education Amendments of 1972; the Age Discrimination Act of 1975; and the Department of Justice Non-Discrimination Regulations 28CFR Part 42, Subparts C, D, E, and G.
7. In the event a federal or state court or federal or state administrative agency makes an adverse finding of discrimination after a due process hearing on the grounds of race, color, religion, national origin or sex against the recipient or any non-profit agency contracting with the recipient to carry out this project, the recipient will forward a copy of the findings to the Idaho Department of Juvenile Corrections (IDJC) and the Office for Civil Rights, Office

¹ The Department also receives notice from subrecipients about any additional subawards of federal financial assistance and routinely reviews pertinent contract language regarding those additional subawards.

of Justice Programs, U.S. Department of Justice. Submit any adverse findings within the past three (3) years of the project award date to IJJC with this award letter.

8. Any agency with over 50 employees is required to formulate an Equal Employment Opportunity Program (EEOP). Recipient (is) (is not) so required, and if so required, hereby certifies to the Idaho Juvenile Justice Commission that it has a current EEOP on file which meets the requirements of 28 CFR 42.301 et. seq.

(Special Conditions at ¶¶ 6-8.)

While the OCR commends the IDJC for seeking to ensure that all applicants and subrecipients are notified of their federal civil rights obligations, the federal assurances and special conditions documents do not consistently represent those obligations, which may confuse subgrantees. (*Compare* Federal Assurances at ¶ 13, *with* Special Conditions at ¶ 6; *compare* Federal Assurances at ¶ 14, *with* Special Conditions at ¶ 7; *compare* Federal Assurances at ¶ 15, *with* Special Conditions at ¶ 8.) Moreover, in several instances, both documents fail to address certain applicable civil rights requirements. Specifically, they do not but should:

- reference DOJ's Equal Treatment Regulations;
- notify subrecipients of their obligation to designate a contact person who is responsible for meeting all civil rights requirements and serving as a liaison with OJJDP and the OCR. 28 C.F.R. § 31.202(a)(1);
- comprehensively address applicable Equal Employment Opportunity Plan (EEOP) requirements governing subrecipients by, for instance, requiring the subrecipient to submit a copy of an EEOP or an EEOP certification to the IDJC so that the Department can monitor its subrecipients' compliance with DOJ's EEOP regulations at 28 C.F.R. § 42.301-.308. *See id.* § 31.202(b)(1);
- notify subrecipients that they must submit to the OCR either an EEOP or the OJP's Certification Form stating that they are eligible for a full or partial exemption from the EEOP requirement. *See id.* § 31.202(b)(2); *id.* § 42.305;
- inform subgrantees of affected persons' rights to file a complaint of discrimination with the OCR for investigation. *See id.* § 31.202(b)(3); and
- require subrecipients to certify that they will take reasonable steps to provide meaningful access to their services to persons with limited English proficiency

(LEP).

2. Onsite Visits and Other Monitoring Methods

In its response to OCR's data request, the IDJC noted that it conducts routine site visits and desk reviews of subrecipients. The Department prepares a monitoring schedule that prioritizes site visits and desk reviews based on a risk assessment of all subrecipients. Under its risk management approach, the Department emphasizes site visits for any subrecipients that have financial irregularities, changes in program leadership, or complaints about program services. If a subrecipient poses few risks, then the Department likely will conduct a desk review instead of a more extensive site visit. The IDJC also conducts a site visit within one year of a new subrecipient receiving federal program funds. During a site visit, a grants/contracts analyst interviews program staff, reviews documents, and uses a checklist in part to determine whether a subrecipient is in compliance with applicable civil rights requirements. Specifically, the checklist elicits information about whether the subrecipient has complied with requirements regarding the preparation of an EEOP and the forwarding of discrimination findings to the OCR.

3. Training and Technical Assistance

In its response to OCR's data request, the IDJC explained that, in October 2006, Department staff participated in a regional training conference that was sponsored by the OJJDP and facilitated by the then-director of DOJ's Task Force on Faith-Based and Community Initiatives. A grants/contracts analyst also provides training to all Title II and Title V program subgrantees during the first quarter of their grant cycle, regardless of whether they received training in prior funding years.² In that training, the analyst discusses the Department's expectations of subrecipients and provides information about whom to contact if they have specific questions. The analyst also highlights EEOP requirements; however, she does not review pertinent federal civil rights laws. While the Department has not provided extensive training to EUDL subrecipients, it scheduled separate training sessions in April and July 2009 for those subgrantees.³

The IDJC's grants/contracts analysts and district liaisons, who are based in Department district offices and collaborate with individual community members, provide ongoing technical assistance to subrecipients. The Department also provides technical assistance in response to

² The Department explained that it does not provide the same level of training to JABG subrecipients because they have more experience with program requirements, in part because they have less leadership turnover than other, non-JABG programs.

³ In addition to the training efforts of the IDJC, the Idaho County Risk Management Program, which provides insurance coverage and risk management services to various Idaho counties, provides training to subrecipients regarding civil rights issues.

specific concerns that arise during monitoring activities. Further, the IDJC notifies subrecipients that they can obtain technical assistance through the OCR.

4. Complaint Procedures

In reviewing complaint procedures, the OCR evaluated the processes in place for individuals to pursue complaints of employment and services discrimination against the IDJC and its subrecipients. While the IDJC has an internal discrimination complaint procedure that is available for Department employees, it does not require subrecipients to have any policies or procedures regarding the handling of employment complaints. However, an IDJC or subrecipient employee can file a charge of discrimination with the Idaho Commission on Human Rights (ICHR) or the Equal Employment Opportunity Commission (EEOC). The ICHR is responsible for enforcing the provisions of Idaho law that prohibit employment discrimination on the basis of race, color, religion, sex, national origin, disability, or age. Idaho Code § 67-5901(2) (2008). In contrast to its procedures for handling certain employment discrimination complaints, the IDJC does not have any policy or procedure regarding the handling of services complaints from its beneficiaries and does not require subrecipients to have any such policies or procedures. In some cases, a Department or subrecipient beneficiary may be able to file a services complaint with the ICHR, which prohibits discrimination on the basis of race, color, religion, sex, or national origin in providing public accommodations. *Id.*

The IDJC has no mechanism in place to receive notice of employment or services discrimination complaints that a subrecipient employee files with the ICHR or the EEOC. However, it endeavors to learn about any such complaints through its monitoring process. During a site visit, the Department seeks information about any complaints that were filed against the subrecipient within the prior three years. The Department leadership explained that it also may learn of specific services discrimination complaints from district liaisons, former employees, or project directors. The Idaho County Risk Management Program also conducts investigations of civil rights complaints for member counties and shares information with the Department regarding any substantiated cases of discrimination.

B. Monitoring Compliance with Faith-Based Regulations

The purpose of the Equal Treatment Regulations is to ensure that “[r]eligious organizations are eligible, on the same basis as any other organization, to participate in any [Justice] Department program for which they are otherwise eligible.” 28 C.F.R. § 38.1(a). The Regulations prohibit the DOJ and DOJ funding recipients from discriminating either for or against an organization on the basis of the organization’s religious character or affiliation. *Id.*

The IDJC participates in the OJJDP’s Title V program, which focuses on assisting units of local government to reduce risks and to enhance protective factors to prevent youth at risk from becoming delinquent and entering the juvenile justice system. Faith-based organizations are

statutorily ineligible to apply directly to the OJJDP or the IDJC for Title V funds. However, the OJJDP encourages faith-based organizations to access such funds by partnering with units of local government in developing the required local delinquency prevention plan and implementing the proposed prevention activities. *OJJDP FY 09 Title V Community Prevention Grants Program*, OJJDP, at <http://ojjdp.ncjrs.gov/grants/solicitations/FY2009/Title%20V.pdf> (last visited Apr. 2, 2009) at 3. At this point, no faith-based organizations receive Title V funds through the IDJC subaward process.

The IDJC also administers the OJJDP's Title II program. As with the Title V program, which shares similar goals with the Title II program, faith-based organizations are statutorily ineligible to apply directly to the OJJDP or the IDJC for Title II funds. However, the OJJDP encourages faith-based organizations to access such funds by partnering with units of local government in developing the required local delinquency prevention plan and implementing the proposed prevention activities. *OJJDP FY 09 Title II Formula Grants Program*, OJJDP, at <http://ojjdp.ncjrs.org/grants/solicitations/FY2009/TitleIIFormula.pdf> (last visited Apr. 2, 2009) at 3. At this point, no faith-based organizations receive Title II funds from the Department.⁴

Next, the IDJC participates in the OJJDP's JABG program, which supports state and units of local government in their efforts to strengthen juvenile justice systems. While faith-based organizations are statutorily ineligible to apply directly to the OJJDP or the IDJC for funding under the JABG program, Section 1806 of the Omnibus Crime Control and Safe Streets Act of 1968 permits units of local government to contract with such groups to implement appropriate JABG purpose areas. *OJJDP FY 09 Juvenile Accountability Block Grants Program*, OJJDP, at <http://ojjdp.ncjrs.gov/grants/solicitations/FY2009/JABG.pdf> (last visited Apr. 2, 2009) at 3-4. During the application and award process, the IDJC encourages recipient cities, counties, and tribes to partner with faith-based groups. However, at this point, no faith-based organizations receive JABG funds through the Department's subaward process.

Finally, the IDJC administers the OJJDP's EUDL program, which aims to enforce state laws that prohibit the sale of alcoholic beverages to minors and to prevent the purchase or consumption of alcoholic beverages by minors. While faith-based organizations are statutorily ineligible to apply to the OJJDP for funding under the EUDL program, they may apply for funding from the IDJC. See *OJJDP FY 09 Enforcing the Underage Drinking Laws Block Grants Program*, OJJDP, at <http://ojjdp.ncjrs.org/grants/solicitations/fy2009/EUDL%20block.pdf> (last visited Apr. 2, 2009) at 3. The Department issues an annual statewide announcement regarding the availability of EUDL funds and offers technical assistance to prospective applicants. In connection with EUDL, the IDJC has established a Prevention Partnership that consists of stakeholder representatives from various state agencies and community groups, including faith-based organizations, and which evaluates the merits of applications through four peer review

⁴ Most recently, approximately four years ago, Boise County subawarded Title II funds to Lutheran Community Services, which provided counselors for a diversionary program.

committees. At this point, no faith-based organizations receive EUDL funds from the Department.

The IDJC also has a religious activities coordinator who acts as a liaison with faith-based organizations. In that role, the coordinator collaborates with faith-based groups to develop additional community juvenile justice resources and seeks to ensure that they are aware of available federal programs.⁵ In addition, he provides the Department's grants/contracts management supervisor with contact information for faith-based groups that may be interested in federal grant funding opportunities. The grants/contracts management supervisor, in turn, gives the coordinator information about specific OJJDP training and program opportunities.

II. Recommendations

The IDJC already has in place a number of procedures for monitoring the civil rights compliance of its subrecipients. To strengthen the Department's monitoring efforts and its inclusion of faith-based organizations in the grant funding process, the OCR offers the following four recommendations: (1) modify the civil rights/nondiscrimination provisions in its federal assurances and special conditions documents; (2) refine its compliance checklist; (3) refine its training to subrecipients regarding their obligations to comply with federal civil rights laws; and (4) develop a comprehensive policy for addressing discrimination complaints.

A. Modify the Civil Rights/Nondiscrimination Provisions in Grant Assurances, Agreements, and Conditions

The IDJC should ensure that all DOJ subrecipients agree to grant contracts that accurately reflect their federal civil rights obligations. To that end, the OCR recommends that the IDJC replace paragraphs 13, 14, and 15 of its federal assurances document and paragraphs 6, 7, and 8 of its special conditions document with the following language or substantially similar language, which would continue to apply to all applicants for and subrecipients of DOJ funding, regardless of the amount of federal financial assistance at issue:

Recipient will comply (and will require any subgrantees or contractors to comply) with any applicable federal nondiscrimination requirements, which may include the Omnibus Crime Control and Safe Streets Act of 1968 (42 U.S.C. § 3789d); the Victims of Crime Act (42 U.S.C. § 10604(e)); the Juvenile Justice and Delinquency Prevention Act of 2002 (42 U.S.C. § 5672(b)); the Civil Rights Act of 1964 (42 U.S.C. § 2000d); the Rehabilitation Act of 1973 (29 U.S.C. § 794); the Americans with

⁵ He also is responsible for protecting the civil rights of juveniles in custody by, in part, ensuring that juvenile detention facilities honor the religious preferences of juveniles.

Disabilities Act of 1990 (42 U.S.C. §§ 12131-34); the Education Amendments of 1972 (20 U.S.C. §§ 1681, 1683, 1685-86); the Age Discrimination Act of 1975 (42 U.S.C. §§ 6101-07); 28 C.F.R. pt. 31 (U.S. Department of Justice Regulations – OJJDP Grant Programs); 28 C.F.R. pt. 42 (U.S. Department of Justice Regulations – Nondiscrimination; Equal Employment Opportunity; Policies and Procedures); 28 C.F.R. pt. 35 (U.S. Department of Justice Regulations – Nondiscrimination on the Basis of Disability in State and Local Government Services); Ex. Order 13279 (equal protection of the laws for faith-based and community organizations); and 28 C.F.R. pt. 38 (U.S. Department of Justice Regulations – Equal Treatment for Faith-Based Organizations).

Recipient will designate a civil rights contact person who has lead responsibility in insuring that all applicable civil rights requirements, assurances, and conditions are met and who shall act as a liaison in all civil rights matters with the Office of Juvenile Justice and Delinquency Prevention, Office of Justice Programs and the Office for Civil Rights, Office of Justice Programs.

Recipient will inform the public and subgrantees of affected persons' rights to file a complaint of discrimination with the Office for Civil Rights, Office of Justice Programs for investigation.

In the event a Federal or State court or Federal or State administrative agency makes a finding of discrimination after a due process hearing on the grounds of race, color, religion, national origin, sex, or disability against a recipient of funds, the recipient will forward a copy of the finding to the Idaho Department of Juvenile Corrections (IDJC) and the Office for Civil Rights, Office of Justice Programs. Submit any adverse findings within the past three (3) years of the project award date to the Idaho Juvenile Justice Commission with this award letter.

Recipient will provide an Equal Employment Opportunity Plan (EEOP) to the Office for Civil Rights, Office of Justice Programs and the IDJC, if required to maintain one; otherwise, it will provide a certification to the Office for Civil Rights, Office of Justice Programs and the IDJC that it has a current EEOP on file, if required to maintain one. For grantee agencies receiving less than \$25,000; or grantee agencies with less than 50 employees, regardless of the amount of the award, no EEOP is required. Information about civil rights obligations of grantees can be found

at <http://www.ojp.usdoj.gov/ocr/>.⁶

As clarified by Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, and resulting agency guidance, national origin discrimination includes discrimination on the basis of limited English proficiency (LEP). To ensure compliance with the Omnibus Crime Control and Safe Streets Act of 1968 and Title VI of the Civil Rights Act of 1964, recipient must take reasonable steps to ensure that LEP persons have meaningful access to its programs. Meaningful access may entail providing language assistance services, including oral and written translation, where necessary. Recipient is encouraged to consider the need for language services for LEP persons served or encountered both in developing its budgets and in conducting its programs and activities. Additional assistance and information regarding your LEP obligations can be found at <http://www.lep.gov>.

Finally, the Department also may wish to add a sentence stating that, in accordance with federal civil rights laws, the subrecipient shall not retaliate against individuals for taking action or participating in action to secure rights protected by these laws.

B. Refine Compliance Checklist

The IDJC is to be commended for its efforts to monitor subrecipients through onsite visits and desk reviews, as well as for its use of a compliance checklist. Going forward, however, the OCR recommends that the Department prepare a more detailed summary of its site visits that includes information about whether the subrecipient is in compliance with pertinent grant requirements, deadlines for completing any compliance recommendations, and the next scheduled review. As part of its responsibility to monitor the compliance of subrecipients with applicable federal civil rights laws, the IDJC also should refine its checklist to ensure that it evaluates all of the various civil rights requirements that apply to recipients of federal funding (e.g., whether the subrecipient has an EEOP on file or has sent one to the OCR for review; whether the subrecipient has findings of discrimination to report to the IDJC or OCR; whether the subrecipient has posted nondiscrimination notices as required by section 504 of the Rehabilitation Act; whether the subrecipient has a grievance procedure and a designated coordinator as required by section 504 of the Rehabilitation Act; and whether the subrecipient is taking reasonable steps to provide meaningful access to programs and activities for LEP persons). Additionally, the checklist should include questions that evaluate whether the subrecipient is complying with DOJ's Equal

⁶ In addition, the OCR reminds the IDJC that grantees receiving \$500,000 or more must acknowledge that failure to submit an acceptable EEOP, which the OCR must approve, is a violation of its Certified Assurances and may result in the suspension of funding obligation authority. See 28 C.F.R. § 31.202(b)(2).

Treatment Regulations, including the prohibitions against using federal funds to engage in inherently religious activities and discriminating against program beneficiaries on the basis of religion. In an effort to assist the IDJC in refining its checklist, the OCR has prepared a sample Federal Civil Rights Compliance Checklist, which is enclosed for the Department's review.

C. Refine Training to Subrecipients Regarding Their Obligations to Comply with Federal Civil Rights Laws

While the IDJC is making a concerted effort to provide training to subrecipients, it should refine its training program to ensure that all subrecipients are aware of their obligations under applicable federal civil rights laws, such as (a) to provide meaningful access to programs and activities for LEP individuals and (b) to have procedures in place to receive and evaluate complaints alleging discrimination from employees and beneficiaries. The OCR is available to provide the IDJC with technical assistance in revising its civil rights training programs.

D. Develop Comprehensive Policy for Addressing Discrimination Complaints

As previously noted, the Department has procedures in place regarding its response to discrimination complaints from its own employees, and the ICHR provides a forum for resolving employment and certain services discrimination complaints filed by IDJC and subrecipient employees and beneficiaries. Nonetheless, the IDJC has an obligation as a recipient of federal financial assistance to have in place a policy that comprehensively addresses how it responds to employment and services discrimination complaints that it receives from its own employees and beneficiaries, as well as from the employees and beneficiaries of subrecipients. Specifically, it should ensure that it has a policy for addressing discrimination complaints that includes at a minimum the following elements:

- designating a coordinator who is responsible for overseeing the complaint process;
- notifying employees of the IDJC, beneficiaries, and subrecipients of prohibited discrimination in funded programs and activities and the Department's policy and procedures for handling discrimination complaints;
- establishing written procedures for receiving discrimination complaints from the IDJC's beneficiaries and from subrecipient employees and beneficiaries;
- referring each complaint to the appropriate agency for investigation and resolution, such as the ICHR or the EEOC; or referring the complaint to the OCR, which will review the complaint and work with the IDJC to resolve the complaint;

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Idaho Department of Juvenile Corrections
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- notifying the OCR in writing when the IDJC refers a discrimination complaint to another agency or when the Department investigates the complaint internally; and
- training IDJC program staff on their responsibility to refer discrimination complaints or potential discrimination issues to the IDJC's complaint coordinator for processing as soon as the alleged discrimination comes to their attention.

Information about the applicable laws, complaint forms, and the investigative process can be found at <http://www.ojp.usdoj.gov/ocr/crc>.

III. Conclusion

We find that the IDJC should implement OCR's recommendations to ensure substantial compliance with the federal civil rights laws that the OCR enforces. On request, the OCR is available to provide technical assistance to the Department in addressing the concerns raised in this Compliance Review Report. **Immediately upon receipt of this letter, we ask that a responsible IDJC official contact Attorney Advisor Christopher Zubowicz to develop a timeline and goals for implementing OCR's recommendations.**

Thank you for your cooperation and the assistance of your staff during the compliance review process. If you have any questions, please contact Mr. Zubowicz at 202.305.9012.

Sincerely,

/S/

Michael L. Alston
Director