

PS 5300.21 EDUCATION, TRAINING AND LEISURE TIME PROGRAM STANDARDS



Program Statement

OPI: FPI
NUMBER: 5300.21
DATE: 2/18/2002
SUBJECT: Education, Training and
Leisure Time Program
Standards

1. [**PURPOSE AND SCOPE** §544.80. In consideration of inmate education, occupation, and leisure-time needs, the Bureau of Prisons affords inmates the opportunity to improve their knowledge and skills through academic, occupation and leisure-time activities. All institutions, except satellite camps, detention centers and metropolitan correctional centers, shall operate a full range of activities as outlined in this rule.]

Satellite camps, detention centers (to include the federal transfer center), and metropolitan correctional centers are exempt from providing full education programs; however, those exempted must have, at a minimum:

- # General Educational Development (GED),
- # English-as-a-Second Language (ESL),
- # continuing education,
- # library services, parenting, and
- # recreation programs.

Independent camps should provide the full range of education programs specified in this Program Statement.

The Bureau requires that uniform standards must be followed in the operation of the Bureau's education, training, and leisure-time programs. Uniform standards are necessary for program accountability and evaluation, and for resource allocation. In addition, experience suggests that clearly defined standards contribute to effective program management and thereby enlarge inmate education, training, and leisure activity opportunities.

[**Bracketed Bold - Rules**]
Regular Type - Implementing Information

2. **SUMMARY OF CHANGES.** This revision clarifies program offering requirements for the Federal Transfer Center, Oklahoma City, and professional training requirements for education and recreation staff and allows credit for some training received from operational/program reviews, correspondence courses, and the Management and Specialty Training Center (MSTC), Aurora, Colorado.

It requires education staff to include the literacy provision of the Violent Crime Control and Law Enforcement Act (VCCLEA) and the Prison Litigation Reform Act (PLRA) in the Education Handbook so inmates can be better informed of the impact of satisfactory progress in the literacy (GED) program on their Good Conduct Time (GCT).

It also clarifies the role of inmate tutors/aides, the SENTRY data reporting requirement for apprenticeship training programs, and the trade advisory committee's purpose for occupational training programs.

3. **PROGRAM OBJECTIVES.** The expected results of this program are:

a. Inmates will be advised of and afforded appropriate opportunities to improve their knowledge and skills through academic, occupation, and leisure-time programs.

b. Accurate and timely records and reports will be maintained about inmates, education staff, individual programs, and the education/training/leisure time programs' overall operation.

c. Each inmate who completes a program will receive a certificate of completion (and/or otherwise have that completion recorded in his or her file) and will receive other appropriate recognition (for example, graduation ceremonies).

d. Each education/recreation department will operate at a high level of professionalism through continuous self and supervisory evaluation, staff development, and communication.

e. Half-day work/education/recreation programs and the number of inmate participation in those programs will increase.

f. Inmate idleness will decrease.

4. DIRECTIVES AFFECTED

a. Directive Rescinded

PS 5300.17 Education, Training and Leisure-Time Program Standards (9/4/96)

b. Directives Referenced

PS 5251.05 Inmate Work and Performance Pay Program (12/31/98)
PS 5300.18 Occupational Education Programs (12/23/96)
PS 5322.11 Classification and Program Review of Inmates (3/11/99)
PS 5325.05 Release Preparation Program (7/18/96)
PS 5350.24 English-as-a-Second Language Program (ESL) (7/24/97)
PS 5350.25 Literacy Program (GED Standard) (9/29/97)
PS 5355.03 Parenting Program Standards (1/20/95)
PS 5370.10 Recreation Programs, Inmates (2/23/00)

c. Rules cited in this Program Statement are contained in 28 CFR 544.80-83.

5. STANDARDS REFERENCED

a. American Correctional Association 3rd Edition Standards for Adult Correctional Institutions: 3-4150, 3-4264, 3-4381, 3-4401, 3-4410, 3-4410-1, 3-4411, 3-4412, 3-4412-1, 3-4413, 3-4414, 3-4415, 3-4416, 3-4418, 3-4419, 3-4421, 3-4422, 3-4422-1, 3-4426, 3-4428, and 3-4447

b. American Correctional Association 3rd Edition Standards for Adult Local Detention Facilities: 3-ALDF-5A-02, 5B-01, 5B-02, 5B-03, 5B-04, 5C-01, 5C-02, 5C-06, 3D-24, and 2E-04

c. American Correctional Association 3rd Edition Standards for Administration of Correctional Agencies: 2-CO-5B-01, 2-CO-5C-01, and 2-CO-5F-01

6. [PROGRAM GOALS §544.81. The Warden shall ensure that an inmate with the need, capacity, and sufficient time to serve, has the opportunity to:

a. Complete an Adult Literacy program leading to a General Educational Development (GED) certificate and/or high school diploma;]

An Adult Literacy program completion is the achievement of

minimum scores for issuance of a high school diploma, or equivalency credential, by the state from which the individual inmate will obtain it.

- Need is defined as not having achieved a verifiable high school diploma or equivalency certificate.
- Verification is established when an inmate furnishes a copy of the credential or official GED scores, or when the achievement is verified officially in a pre-sentence investigation report.

[b. Complete one or more levels of English-as-a-Second Language;]

The English-as-a-Second Language (ESL) program offers limited English-proficient inmates the opportunity to improve their English skills.

- An ESL completion is the achievement of at least a score of 225 (eighth grade proficiency) on the Comprehensive Adult Student Assessment System (CASAS) Reading Certification Test and a score of 215 on the Listening Comprehension Test, respectively.
- Need is defined as a score of less than 225 and 215 on the CASAS Reading Certification Test and Listening Comprehension Test, respectively.

[c. Acquire or improve marketable skill through one or more programs of Occupation Education (OE);]

The need for occupation training will be based on the inmate's previous education and work history. When there is no demonstrated stable work history, or no specialized education or training record to demonstrate a marketable skill, an inmate will need some form of training. Program participation restrictions may be applied in accordance with the Occupational Education Program Statement.

Programs of occupation counseling, work experience, and/or formal training may be used (independently or in combination) to satisfy the identified need.

Ordinarily, an inmate does not receive compensation for participating in any Occupation Education program. When

compensation is received (for example, during Apprenticeship

Training), it may not exceed the amount appropriate for participation in institution or UNICOR work assignments.

An Occupation Education enrollment is to be entered into the SENTRY Education Courses (EDC) category when the inmate begins a program of study in any formal occupational skills training program. Final action will be entered in the SENTRY EDC system when an inmate exits that program.

Successful completion is when one of the following criteria is met:

(1) **Exploratory Training.** Achieving written criteria the institution established and approved by the Supervisor of Education.

- Exploratory programs are designed to provide an introduction to a specific occupation or a "cluster" of related occupations.
- Ordinarily, programs are less than 100 hours; however, completing predefined criteria rather than attendance must be demonstrated before awarding an exploratory level completion.

(2) **Marketable Skill Training.** Achievement of marketable skills, marketable at least at the normal entry level for a specific occupational title or cluster of titles; **and** completion of at least 100 hours of program attendance.

- Concurrent academic education requirements such as GED completion or GED enrollment may be established for marketable skill training programs.
- Ordinarily, inmates may not be enrolled in any marketable skill training program if they have not met academic requirements previously or if they do not maintain concurrent GED enrollment.

Individual exemptions may be made, e.g., an inmate who is exempt from the GED continuing participation/promotion requirements because of **documented special learning needs**, but has the capability to learn the marketable job skills with **reasonable accommodations**.

(3) **Apprentice Training.** Achievement of the Joint Apprenticeship Committee's requirements for a journeyman's certificate in a U.S. Department of Labor, Bureau of Apprenticeship and Training registered program.

The start date for tracking apprenticeship training hours in the SENTRY-based Education Courses (EDC) category is the actual date when the state or local apprenticeship training bureau or council accepts an inmate into the apprenticeship program.

Education staff should use the SENTRY-based Periodic Review/Withdrawal Record (PERW) to document training hours from another institution and/or other relevant training history.

[d. Complete one or more Postsecondary Education activities;]

A Postsecondary Education program completion is receiving a passing grade in a course an accredited postsecondary education institution has approved for postsecondary credit.

[e. Complete one or more Adult Continuing Education activities;]

Adult Continuing Education (ACE) activities are those formal instructional classes that are of special interest such as:

- typing,
- financial planning,
- parenting,
- refresher training in a basic skill,
- consumer education, or
- computer literacy.

Continuing education is completed when an inmate meets the participation and achievement standards established for that activity.

[f. Participate in one or more leisure, fitness, wellness or sport activities;]

All inmates are considered to have a need for informal recreation and leisure activities. Certain inmates may benefit, because of existing medical, physical, or emotional needs, from involvement in a more formal program.

- Such needs will be considered at initial classification meetings or when recommended by a member of the unit, psychology, medical, or recreation staff.

Completions of leisure and wellness activities will be reported on the Education Data System (EDS) when they meet established performance criteria.

[g. Participate in a Release Preparation program; and]

Release Preparation is a multi-disciplinary program that assists the inmate with specific and broad-based preparation for release back into society. Completion of **education** portions of the release preparation program is achieved and documented in the EDS when an inmate attends and completes release preparation courses as outlined in the Program Statement on the Release Preparation Program.

All education courses entered into EDC RE** in the release preparation program must meet the requirements outlined in the Program Statement on the Release Preparation Program and be approved by the Supervisor of Education.

[h. Participate in Career Counseling.]

Career Counseling will be an ongoing activity throughout the inmate's incarceration. Individual needs will be determined by a combination of factors, e.g.,:

- P educational level,
- P work history,
- P aptitude and interest inventories,
- P specific job skills, and
- P unit team recommendations.

Inmates with career counseling needs can participate in a self-help program that assists them with career planning and development.

[Staff shall encourage each inmate to accept the responsibility to identify any specific education needs, set personal goals, and select activities, programs and/or work experiences which will help to reach those goals.]

7. [GENERAL PROGRAM CHARACTERISTICS §544.82

a. The Supervisor of Education shall assure that the following minimum criteria are met for the institution's education program set forth in §544.81.]

28 CFR 544.81 refers to Section 6 of this Program Statement.

These criteria must be met before the program can be reported into the SENTRY EDC:

[(1) There is a written curriculum which establishes measurable behavioral objectives and procedures.]

The Supervisor of Education must approve and teachers must follow the curriculum.

- The curriculum must be reviewed annually and updated as necessary. The review will be documented. A copy of the curriculum and its review records are to be kept in the Supervisor of Education's office. These requirements should not apply to activities entered into EDC RN**.

[(2) There are clear criteria which establish minimum expectations for program completion, as well as provisions for the assessment of student progress.]

(3) There are provisions for periodic review of the relevancy and effectiveness of the program.

(4) Unless unusual circumstances (e.g., college credit courses) exist, all programs should allow for open entry and exit, at least on a monthly basis.

(5) The Supervisor of Education may establish other requirements necessary to assure that the stated goals of the program are achieved.]

When questions exist, the Supervisor of Education is to consult with the Regional Education Administrator and document any approved deviations from minimum standards.

[b. Upon an inmate's completion of a program specified in §544.81, staff may issue and/or review and file a certificate when it contributes to an inmate's future plans in such a way that it validates the inmate's education and training; supports the inmate's chances of securing employment; improves the inmate's acceptance for advanced education; or enhances the inmate's opportunity for success in any other activity the inmate chooses to pursue. The certificate will confirm that the inmate has completed the requirements to receive a certificate that fits one or a combination of the following categories:]

28 CFR 544.81 refers to Section 6 of this Program Statement.

[(1) Accredited certificates - high school diplomas and occupation training certificates approved or issued through local school districts, state departments of education, or other recognized accrediting educational organizations;

(2) Postsecondary certificates and transcripts - postsecondary degrees or course certificates approved or issued through a sponsoring accredited educational institution;

(3) General Educational Development tests - programs sponsored by the American Council on Education;

(4) Private certificates - outside agencies, private business and industry, other than those stated in paragraph (b)(1) of this section;

(5) Institutional certificates - approved general education, occupation training, recreation, adult continuing education and social education certificates, issued to an inmate who completes a program, and when the institution cannot provide a certificate as provided in paragraphs (b)(1) and (4) of this section; or]

[(6) Transcripts - issued to an inmate who completes general education programs, formal occupation training, on-the-job and apprentice training and work assignments. With the inmate's consent, transcripts may be sent to schools and colleges, business, industries and other agencies.]

c. Each institution is to provide programs for bilingual and bicultural inmates.

- Reasonable efforts will be made to obtain bilingual teaching materials and resources.

d. Standard competency based curricula must be supported by appropriate instructional materials and classroom resources.

- Instructional objectives are to be stated in terms which allow the performance to be observed or assessed.

Emphasis is to be placed on individual student progress and evaluation based on performance, according to established criteria.

- Instructors must provide and maintain individual student progress charts corresponding to the competencies identified in the curriculum.

e. Reasonable classroom space and supplies of necessary equipment, including desks and chairs, audiovisual materials, and other relevant instructional materials, should be provided for all academic, occupation, and leisure-time programs.

f. Each Supervisor of Education is to ensure that academic, occupation, and career counseling is provided to individual inmates. Counseling should provide assistance, encouragement, and feedback regarding the inmate's education and occupation program plans while incarcerated and post-release goals.

Individualized assessment procedures (e.g., education interview, program recommendations) should be conducted during the Admission and Orientation (A&O).

g. A graduation ceremony will be held at least annually in each institution to recognize inmates for program accomplishments, including those in ESL, GED, occupation training, postsecondary education, leisure-time activities, and other programs. Additional recognition ceremonies may be held as needed.

8. HALF-DAY WORK/EDUCATION/RECREATION PROGRAM OPTION. At the Warden's discretion, all sentenced inmates may be placed in the education programs stated in Section 6 in a half-day work/education/recreation programming option.

- A half-day work/education/recreation assignment is defined as approximately three to four hours of continuous education/recreation or related programming in the morning or afternoon.
- Ordinarily, inmates with half-day programming are assigned to regular work assignments for a half-day and to education/recreation, or a related program, for the remaining half-day.

Ordinarily, inmates in half-day work/education/recreation programs do not receive compensation for the education/recreation portion of half-day work/education/recreation programs.

- However, local institutions may elect to pay inmates for participating in half-day education/recreation (e.g., apprenticeship training program) if resources permit.

When compensation is received, it may not exceed the amount appropriate for participating in institution or UNICOR work assignments.

9. [**INMATE TUTORS §544.83.** Institutions may establish an inmate tutor/aide program. Guidelines shall be developed regarding the training and supervision of inmate tutors/aides where such programs are available.]

When implemented effectively, an inmate tutor/aide program provides an effective alternative to combat inmate idleness and to promote positive use of the inmate labor force.

When feasible, institutions are encouraged to establish an inmate tutor/aide program to use as many inmate tutors/aides as needed.

At a minimum, guidelines should address:

- # The supervision, training, and certification of inmate tutors/aides,
- # Performance pay for inmate tutors/aides,
- # Position description for inmate tutors/aides, and
- # Other concerns as identified locally.

Inmate tutors/aids cannot serve as the primary instructors for the GED or ESL programs. They can only assist Bureau staff or contract instructors with instruction delivery.

- However, working under the general guidance and supervision of Bureau staff or contract instructors, inmate tutors/aids can teach adult continuing courses (ACEs) and other self improvement classes.

10. **PROGRAM STANDARDS.** The following standards apply to education programs and full-time Civil Service and contract teachers:

a. **Instruction Time.** All full-time teachers and education specialists must spend at **least** 75 percent of their 40-hour workweek in instruction or in work related to instruction, with a minimum of 50 percent of their work hours spent in direct classroom instruction.

- Full-time test administrators are not expected to meet the 50 percent direct classroom instruction requirement.

b. **Adult Continuing Education.** Adult continuing education

classes are organized differently in different institutions. Additionally, non-education staff members sometimes share responsibilities for developing and supervising these activities.

Therefore, no national standards are established for class size. However, when full time staff or fully funded contractors provide instruction, ordinarily at least 15 students should be considered necessary to justify program continuation.

c. **Accreditation.** Whenever feasible, education and occupation programs are to be accredited by a state or other recognized accreditation association or agency. When a regional branch of the American Association of Colleges and Schools provides for the accreditation of "optional" or "special" schools, institutions should be accredited by that agency, if it can be achieved cost effectively.

When there is no feasible method of accrediting the entire department, special efforts should be made to gain independent certification for each occupation training program.

Certification tests from organizations (e.g., National Occupational Competency Testing Institute, American Service of Excellence) may also be administered to individual inmates upon completing a specific occupational training program.

- However, the individual skill competency certification should not replace a training program's certification.

d. **Schedule.** The education program will operate on a 12-month basis with minimum break periods for holidays.

e. **Program Hours.** Education activities are to be scheduled at least eight hours per day, Monday through Friday. (The hours need not be consecutive; e.g., 8:00 - 11:00 AM, 12:30 - 3:30 PM, and 6:00 - 8:00 PM are acceptable).

- Friday evening education activities may be eliminated when there are eight hours of combined Saturday or Sunday education activities.

Recreation activities will be programmed at least eight hours per day, Monday through Friday, to include both afternoons and evenings and at least 12 hours per day on weekends.

- Special weekday morning recreation supervision may be

required when a significant group of inmates would not have access to exercise areas in the evening because of work assignment conflicts.

f. **Mandatory Education Program Hours.** Each mandatory education class session (literacy and ESL), to include special learning needs (SLN) class, must meet a minimum of one and one half hours per day. Daily class sessions may be longer, contingent upon local institution resources and needs. Program hours should be consistent with the Literacy and ESL Program Statements.

g. **Weekend Programs.** Weekend education service operation is encouraged when staff resources and the facility's location permit.

h. **Teacher Evaluations.** The Supervisor of Education shall ensure that annual formal class observations are conducted for all teachers. The Supervisor of Education shall provide feedback to the teacher about the overall quality of the classroom environment. This may include descriptive comments about classroom structure and discipline, student participation and motivation, and lesson preparation.

i. **Staff Training.** The Supervisor of Education and the Supervisor of Recreation are to ensure that at least 48 hours of training are provided every three fiscal years to the appropriate education/recreation staff members as described below.

- This 48 hour requirement may include the 8 hour per year, discipline specific training incorporated in Annual Refresher Training. All other mandatory training will not be counted toward the 48 hour requirement.

The training should be in two broad areas, with 20 - 28 hours in each area, for a total of 48 hours every three fiscal years. Regional training in education/recreation services can be applied to both areas.

(1) **Professional development which specifically relates to the education/recreation discipline.** The intent of this type of training is to ensure that education and recreation professional staff stay abreast of the current thinking and trends in their discipline's professional community.

This can be accomplished through department-wide retreats,

off-site training, correspondence courses, or other appropriate methods.

- When department-wide retreats are conducted to provide this type of training, the training must be provided by outside speakers or Bureau staff knowledgeable of current education or recreation theories and practices.
- The subjects covered at these department-wide training sessions must relate to broad education or recreation professional development, not Bureau policies and practices. Subjects may include:
 - P learning styles and assessments,
 - P tournament organization and management,
 - P vocational training standards,
 - P language acquisitions, and
 - # other appropriate current theories and practices of education and recreation service delivery.

Departmental-wide retreats to develop strategic plans or to provide SENTRY training will not be counted toward the 20 - 28 hours in this professional development area, but they can be counted toward the Bureau policies and procedures subsection (2) below.

Correspondence courses provide a viable way to keep abreast of current theories and practices in education and recreation professional fields. With the Supervisor of Education and the Employee Development Manager's approval, selected correspondence courses may be counted toward the 20 - 28 professional training hours.

- Mandatory Bureau training that is not related specifically to the education/recreation discipline may not be applied to this 20 - 28 hours of training in this area.
- However, mandatory training courses offered at the MSTC that are related specifically to the education/recreation discipline such as teacher development, recreation/sports specialist training and education/recreation management training can be counted toward the 20 - 28 training hours in this area of training.

Cross development training in Education/Recreation Services taken by the new education and recreation staff and Spanish Immersion and Inmate Job Placement training taken by education/recreation staff can be applied to meet the requirement in area (1).

Professional education/recreation staff must have 20 - 28 hours every three fiscal years relating to professional development.

- Clerical and support staff are encouraged to acquire training in relevant professional areas.

(2) **Bureau policies/procedures which specifically relate to the education/recreation discipline.** This training's intent is to ensure that **all** education/recreation staff members are fully trained in relevant Bureau policies and procedures pertaining to education/recreation disciplines. Examples of acceptable training include:

- P SENTRY training for the VCCLEA and PLRA procedures,
- P participation in **education/recreation** operational and program reviews. The maximum amount of hours within a three fiscal year period from both types of review is **24** hours,
- P GED test security procedures, or
- P recreation-based security procedures, etc.

All education/recreation staff must complete 20 - 28 hours of training in this area every three fiscal years.

j. **Unit Team Participation.** An education or recreation staff member must be assigned to serve as an education advisor on each unit team as outlined in the Program Statement on Inmate Classification and Program Review.

k. **Admission and Orientation Handbook.** Each Education Department must develop an education handbook and make it available to all inmates during Admission and Orientation.

- Handbooks are to be updated at least every two years.

The handbook should give a brief overview of all education and recreation programs, the incentives and achievement awards system, and other pertinent information and include the VCCLEA and PLRA's literacy provisions.

A foreign language version of the education handbook (for example, Spanish) may be produced when 10 percent of the institution's inmates speak that foreign language and do not speak English.

1. **Trade Advisory Committee.** A trade advisory committee is required when occupational training programs are not offered by outside accredited education institutions or are not certified or accredited by outside accrediting or certifying agencies. When an entire education department is accredited or certified by an outside accrediting agency/organization, a trade advisory committee still is required to ensure individual program quality.

The trade advisory committee's size and composition may vary according to local needs, but must include at least two active members who are not regular employees or institution contractors.

The intent is to include representatives from trade organizations, accredited training institutions, or potential employers.

- These committees are to meet at least twice a year with at least one meeting conducted at the institution.
- Minutes from the trade advisory committee are to be prepared and maintained for three years.

At least once a year, the committee members will assist the training instructor to review the curriculum, instructional delivery, equipment, and other relevant areas to ensure that the training program is comparable to community standards. The review findings must be documented and maintained for three years. This review process can be part of the meeting conducted at the institution.

11. **ATTENDANCE.** The Supervisor of Education will monitor both unexcused and excused absences from school.

- Inmates are expected to attend class unless officially excused.
- The Supervisor of Education must watch for and correct patterns of program interruptions due to work details, sick calls, and other call-outs.

The Supervisor of Education is to ensure that all teachers maintain current class rolls. Inactive class rolls are to be dated and archived for three years. Institution and regional education staff will use these rolls for routine data maintenance and periodic program reviews.

12. **INMATE EDUCATION RECORDS.** An electronic education record is to be created and maintained to document inmate participation in education programs. An education record consists of:

a. **Interview Record.** Documents inmate education level, program interests, and related areas. An interview record is not required for pretrial inmates.

b. **Program Review/Withdrawal Record.** Documents the periodic reviews of inmates participating in literacy and other education programs.

c. **Justification of Exemption Record.** Where applicable, documents program exemptions.

d. **Test Scores.** Where applicable, documents literacy and ESL test scores.

Appropriate certificates and diplomas, as specified in Section 7.b., may be issued to inmates to document their achievements in and completions of education programs.

13. **PROGRAM REPORTS AND DEPARTMENT MEETINGS.** By February 15th of each fiscal year, Supervisors of Education must submit an annual education program report to the Wardens of their institutions reflecting achievement of strategic goals in meeting the inmate population's education and program service needs.

- Copies are sent to the Central Office Education Administrator and Regional Education Administrator.
- A copy of the institution's education handbook and class schedules are to accompany each annual education program report.
- The Education Department is to maintain a copy of the annual education report for 10 years.

The Supervisor of Education must hold monthly education/recreation staff meetings.

The Supervisor of Recreation is to hold monthly staff meeting when recreation is a separate department.

- Minutes from these meetings will be sent to the Regional Education Administrator, the Central Office Education Administrator, the Warden, and the appropriate Associate Warden via BOPNet GroupWise. Minutes may also be sent via GroupWise to other Supervisors of

Education or Supervisors of Recreation in the region.

- A copy of staff meeting minutes is to be maintained in the Education/Recreation Department for three years.

14. **REVIEW OF STANDARDS.** As part of the annual review and certification process, Central Office education staff must review these standards and definitions periodically (no less than once every year) and ensure that they are revised and updated, as necessary.

15. **EDUCATION DATA SYSTEM (EDS).** Supervisors of Education (or Supervisors of Recreation where Recreation is a separate department) are responsible for accurate and timely reporting of the department's program activities in accordance with the most current EDS guidelines. Supervisors of Education (or Supervisors of Recreation where Recreation is a separate department) must provide EDS training for all department staff.

Regional Education Administrators are responsible for monitoring the EDS data's validity and accuracy from their respective regions and for promoting the EDS' managerial use.

/s/
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Director