

# Potter, Randall and Armstrong Counties CSCD Strategic Plan

## FY2022-2025



Natalie White, Director

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806-378-3740

**Judicial Endorsement**

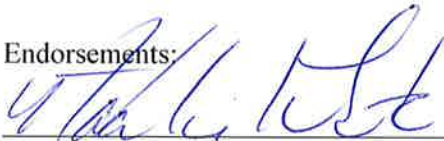
**TDCJ-COMMUNITY JUSTICE ASSISTANCE DIVISION**

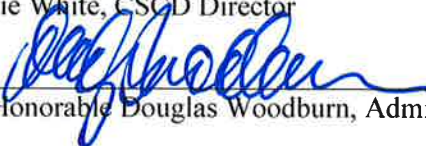
*In collaboration with*

**Potter, Randall & Armstrong Counties CSCD and**

Dan Schaap	District Judge, 47 <sup>th</sup> Judicial District
Douglas Woodburn	District Judge, 108 <sup>th</sup> Judicial District
Titiana Frausto	District Judge, 181 <sup>st</sup> Judicial District
Ana Estevez	District Judge, 251 <sup>st</sup> Judicial District
Pamela Sirmon	District Judge, 320 <sup>th</sup> Judicial District
Walt Weaver	Judge, County Court-at-Law #1, Potter County
Matthew Hand	Judge, County Court-at-Law #2, Potter County
James Anderson	Judge, County Court-at Law #1, Randall County
Matt Martindale	Judge, County Court-at-Law #2, Randall County
Hugh Reed	County Judge, Armstrong County

Endorsements:

 2/23/2022  
\_\_\_\_\_  
Natalie White, CSCD Director Date

 2/23/2022  
\_\_\_\_\_  
The Honorable Douglas Woodburn, Administrative Judge Date

## Director's Foreword

Texas Government Code, §509.007 requires community supervision and corrections departments (CSCDs) to submit a Strategic Plan in even numbered years to its Board of Judges and then to the Community Justice Assistance Division of the Texas Department of Criminal Justice (TDCJ-CJAD). As a very new director, I am continuously learning something new. The preparation of this plan has given me the opportunity to research, compare data, and collaborate with my leadership team and line officers. Together, we asked and answered the questions: Where are we now and where do we want to be? What do we need to start doing? What do we need to stop doing? What do we need to do better? How do we know we are accomplishing what we set out to do?

Our team believes that our mission, vision, and values are the foundation of everything that we do. We lead by example and inspire others by demonstrating kindness, integrity, collaboration, accountability and a strong work ethic in our own daily lives. We treat all individuals with dignity and respect, and believe that all people have the ability to change regardless of their past. We trust that when our Judges place someone on community supervision, they do so with the belief that the individual has the ability to complete their term successfully. We strive to inspire and encourage positive change, giving the clients that we serve the opportunity to improve their lives. The Potter, Randall and Armstrong Counties CSCD is committed to diverting probationers from prison and jail by providing evidence-based programs and supervision that improves lives and leads to successful completion of probation. The identification and treatment of barriers such as substance abuse, emotional instability, trauma, and dysfunctional thinking is necessary to elicit long-term change in behavior. Diverting clients from jail and prison without addressing these core issues is ineffective, results in recidivism, and jeopardizes the safety of our community.

The questions that we asked during the Strategic Plan development are the same questions that we ask our clients every day to inspire positive change. We are proud of the role that we play within the criminal justice system. The Potter, Randall and Armstrong Counties Strategic Plan will serve as an outline of the problems that we encounter and the solutions that we apply as we continuously seek better ways to *improve lives for a safer community.*

# Mission • Vision • Values

## Mission



The mission of the Potter, Randall and Armstrong Counties CSCD is to provide individualized supervision that promotes both accountability and effective interventions, which in turn, creates a safer community.

## Vision

*Improving Lives for  
a Safer Community*



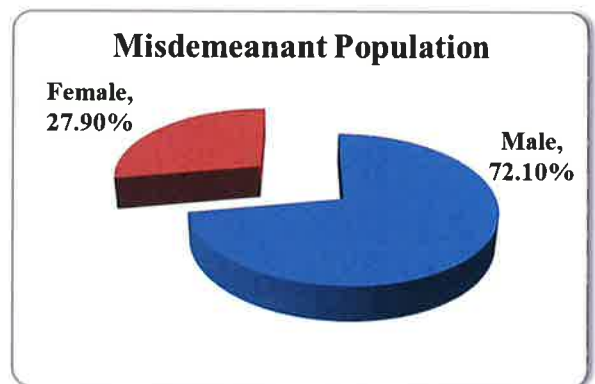
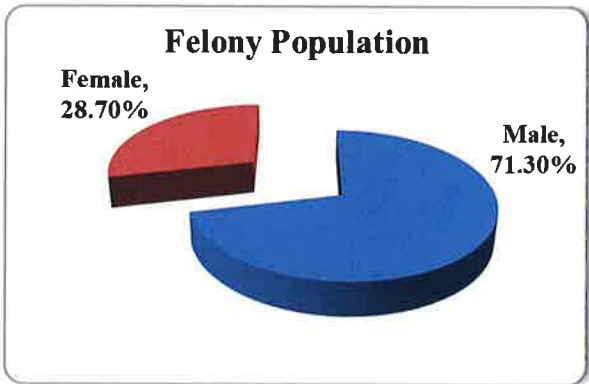
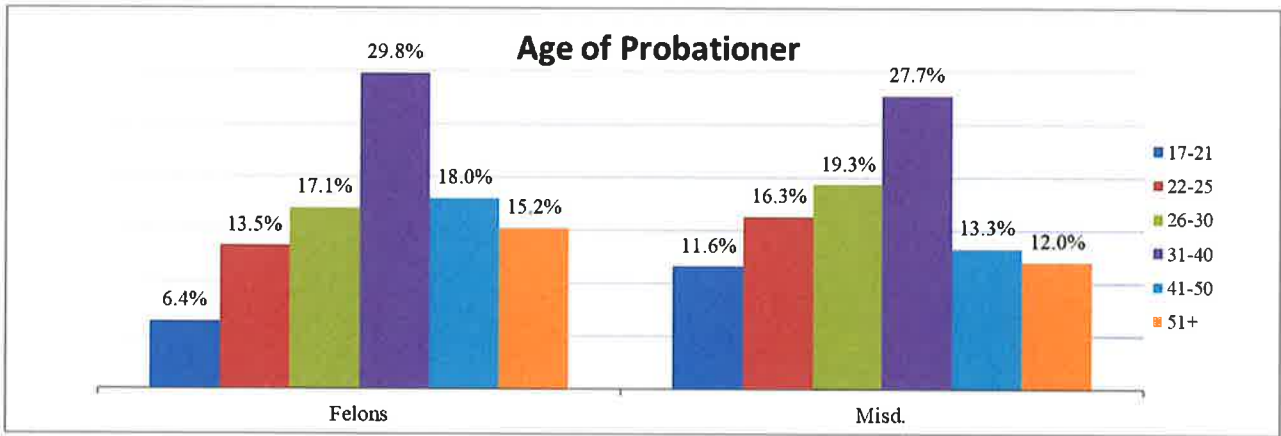
## Values

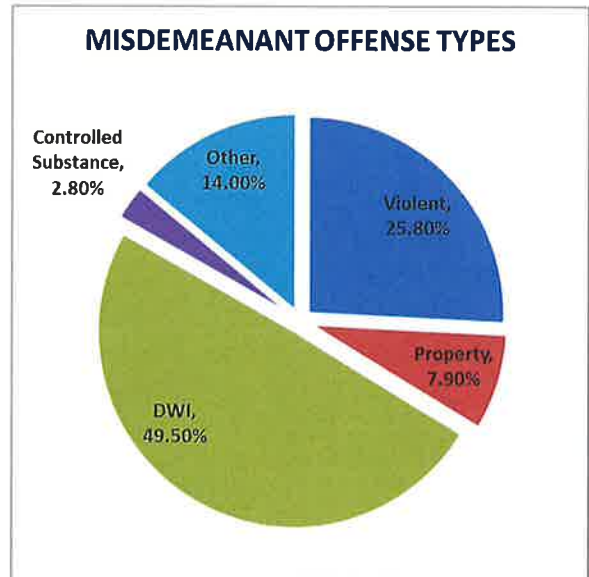
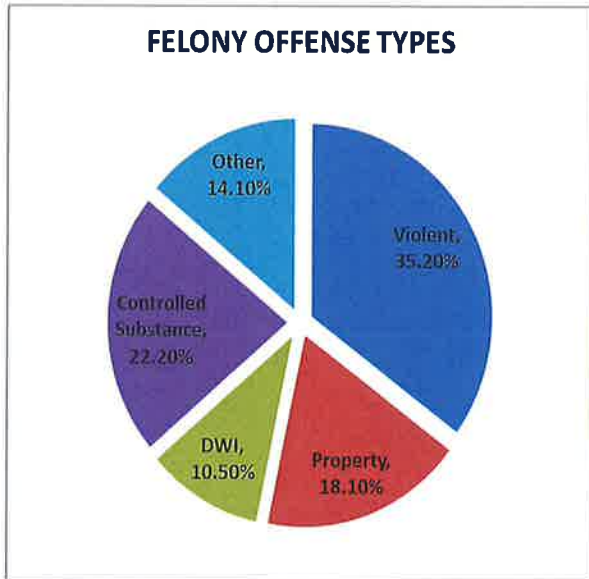
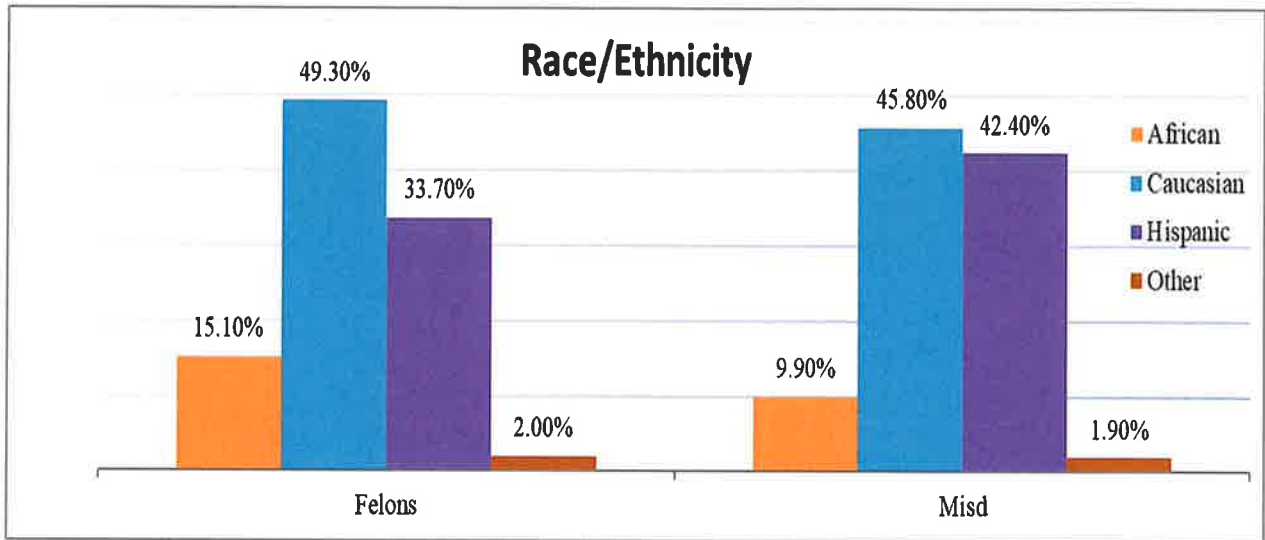
- **RESPECT and DIGNITY:** We treat every individual with respect and dignity.
- **INTEGRITY and TRUST:** We have high ethical principles creating an atmosphere of integrity and trust.
- **CONTRIBUTION and PERFORMANCE:** We believe that contribution of everyone is valued, and everyone has the opportunity to perform at their highest level.
- **ACCOUNTABILITY:** We are accountable to our courts, our community, our clients, and our team.
- **ABILITY TO CHANGE:** We believe that all people have the ability to change regardless of their past.
- **COLLABORATION:** We are committed to collaboration with other community resources to address our clients' needs and achieve positive results.
- **EVIDENCE-BASED PRACTICES:** Evidence-based practices and policies are utilized to insure our best efforts are leading to desired outcomes.
- **EXCELLENCE:** We seek excellence in everything that we do and continuously strive for improvement.
- **KNOWLEDGE:** We are dedicated to creating an environment that encourages learning and professional growth.

# CSCD Overview

According to the 2020 U.S. Census data, the combined population in Potter, Randall and Armstrong Counties was 261,126. The Potter, Randall and Armstrong Community Supervision and Corrections Department currently employs 51 staff. Of these staff, 30 are Community Supervision Officers.

During FY 2021, the CSCD supervised a total of 2,520 direct cases, 673 indirect cases, 281 pre-trial cases, and 339 intrastate transfer out cases. The department is committed to providing evidence-based practices designed to reduce criminal behavior and promote prosocial behavior. We strive to give every probation client the opportunity, resources, and accountability needed to complete supervision successfully. Below are demographics that the Potter, Randall and Armstrong Counties CSCD served and the various types of offenses that were supervised throughout FY 2021.





# Funding for FY2022-2023

For operating funds, the CSCD depends on supervision fees paid by probationers and appropriations from the state legislature. Data below is from TDCJ-CJAD FY22-23 approved initial budgets and OOG Adult Drug Court budget as of 01/18/2022.

- **Basic Supervision (BS):** State funding distributed to CSCDs based on the numbers of probationers they supervise.
- **Community Corrections (CC):** State funding based on a formula calculated from the number of probationers and the population of the counties encompassed by the CSCD.
- **Diversion Programs (DP):** State funding that is essentially a competitive grant process. Changes in DP funding from year to year come as the result of programs exceeding or underperforming with regards to the state averages for similar programs.
- **Local Revenue** comes from the monthly supervision fees that defendants are required to pay, as well as fees to offset the costs of such thing as urinalysis testing and program participation.

## Basic Supervision (BS)

Program	State Aid
Basic Supervision	\$839,335.00
Dedicated Salary Increases	\$154,289.00
High/Medium Reduction Caseload	\$191,001.00
SAFPF Revenue	\$22,000.00
	<b>\$1,206,625.00</b>

## Community Corrections (CC)

Program	State Aid
Sex Offender Program	\$365,121.00
Community Control	\$122,185.00
	<b>\$487,306.00</b>

## Diversion Program (DP)

Program	State Aid
Substance Abuse Treatment Program	\$165,498.00
Mentally Impaired Caseload (MHI)	\$89,014.00
Drug Court Aftercare Caseload	\$62,127.00
Domestic Violence Pretrial Diversion (DV-PTD)	\$35,004.00
	<b>\$351,643.00</b>

## County/ Outside Grant/ Other Funding

Program	Funding
Adult Drug Court (OOG Grant)	\$85,406.30
Court Supervised Release Program (Pre-Trial Bond Program)	\$149,089.00
	<b>\$234,495.30</b>

## Potter-Randall-Armstrong CSCD Local Revenue

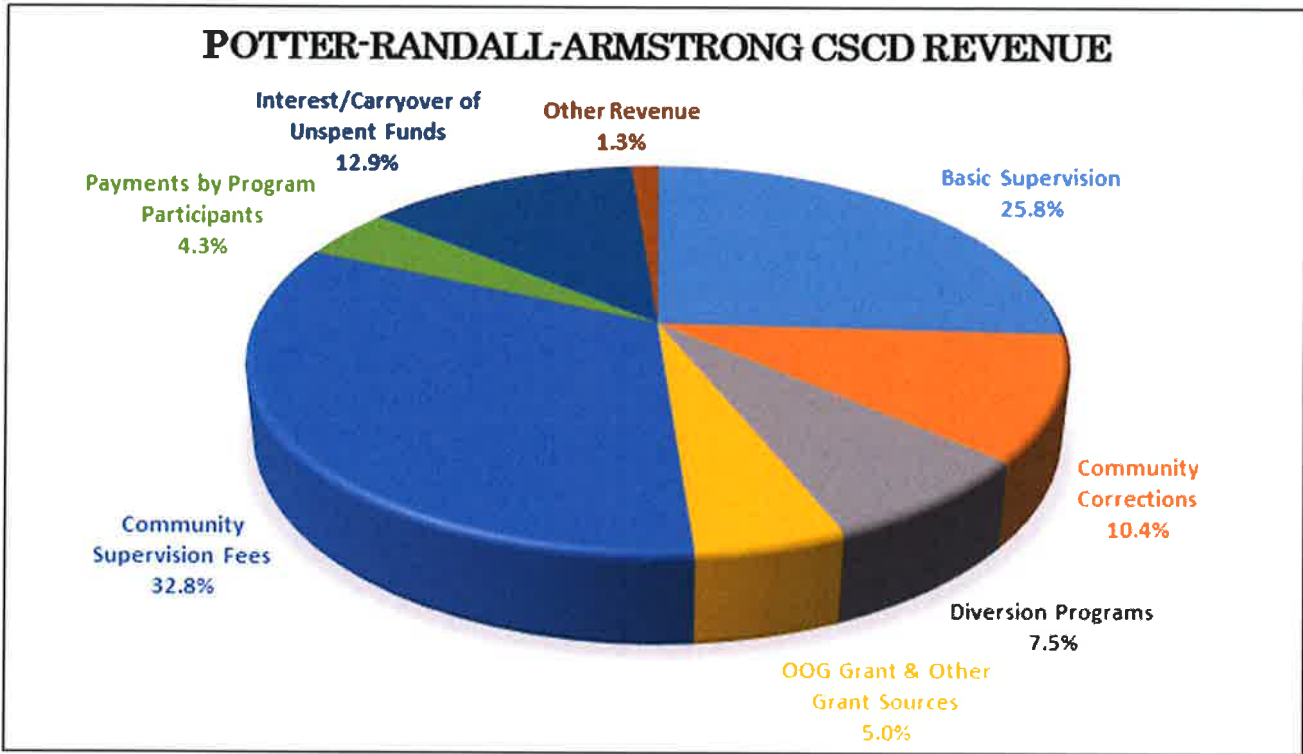
Program	State Aid
Community Supervision Fees	\$1,536,000.00
Payments by Program Participants <sup>1</sup>	\$199,200.00
Interest/Carryover of Unspent Funds	\$601,000.00
Other Revenue <sup>2</sup>	\$59,560.00
	<b>\$2,395,760.00</b>

## TOTAL REVENUE

Program	State Aid
Basic Supervision (BS)	\$1,206,625.00
Community Corrections (CC)	\$487,306.00
Diversion Program (DP)	\$351,643.00
County/ Outside Grant/ Other Funding	\$234,495.30
Local Revenue	\$2,395,760.00
	<b>\$4,675,829.30</b>

<sup>1</sup> For classes, drug tests, SCRAM monitoring, pre-trial diversion fees and transfer fees

<sup>2</sup> TDHS collection fees, transaction fees, unclaimed restitution fee, classes for non-offenders, etc.



The chart above shows that state aid received from Basic Supervision, Community Corrections, and Diversion Programs accounts for 43.7% of the department's total revenue. 5% of the total revenue is received from Office of the Governor Grant for Drug Court and Potter County for Court Supervised Release Program (CSRP Bond Program) and Potter County funded specialty courts (Panhandle Regional Veteran's Court and Panhandle Regional Problem-Solving Court). 12.9% consists of interest and carryover of unspent funds.

The State of Texas expects local CSCDs to fund a significant portion of their budgets by collecting a variety of fees from defendants. The Potter, Randall and Armstrong Counties CSCD collects the state-mandated supervision fee (generally \$60 but may be lowered based on the defendant's income and financial needs), as well as payments for classes, drug testing, SCRAM monitoring, pre-trial diversion, transfer fee, transaction fee, and unclaimed restitution fee. 38.4% of the department's total revenue consists of locally generated funds. (Interest and carryover are not calculated into this percentage.) While local revenue is critical to the funding of the department, the Potter, Randall and Armstrong Counties CSCD evaluates each individual's financial situation and accomodates appropriately.

Funding Source/Date: TDCJ-CJAD FY22-23 approved initial budgets and OOG Adult Drug Court budget adjustment as of 01/18/2022



# Programs and Services for FY2022-2025

## Current Programs and Services for FY2022-2023

ID	Program Name	Primary Code and Designator	Secondary Code(s) and Designator(s)	Funding Type(s)
6	Pretrial Diversion Caseload	Pre-Trial Services PTR-01		BS
<p>The CSCD has one pretrial diversion caseload in which the officer monitors the compliance and progress of defendants who have been granted a diversion from prosecution by the Potter, Randall or Armstrong Counties District Attorney's Offices. The defendants are required to meet certain goals set by the DA's office in order to earn the diversion. These are typically low-risk defendants that meet eligibility criteria set by both the CSCD and District Attorney's offices. The term can last up to two years.</p>				
8	Sex Offender Program	Specialized Caseload Sex Offender SCPX-01	SXC-02	BS/CC
<p>These three caseloads ensure defendants with current or previous sex offenses or who are ordered to register as sex offenders comply with their legal requirements, including counseling, changes of address, contact with/access to victims/children, and proximity to child safety zones. Static 99 sex offender risk assessments are also conducted as necessary. Defendants remain on the caseload for the duration of their supervision.</p>				
9	Substance Abuse Treatment Program	Substance Abuse Program SAT-01		CC/DP
<p>This cognitive-behavioral treatment program provides services to participants who are high to low moderate risk and abuse alcohol/drugs. Treatment shall be based on substance abuse, addiction and criminogenic risks/needs identified through assessments and revised according to the offender's successful resolution of problems identified during assessment process. The program may include participants returning from inpatient treatment facilities required to complete an aftercare program. The program provides weekly Substance Abuse Treatment Program groups and individual substance abuse counseling.</p>				
11	Community Control	Specialized Caseload Other SCPO-01	Global Positioning System GPS-01 Comprehensive Alcohol Monitoring CAM-01	BS/CC
<p>The department utilizes Global Positioning System to monitor the location of high-risk clients for up to 180 days. Secure Continuous Remove Alcohol Monitoring (SCRAM) is utilized for probationers with alcohol abuse problems for up to 90 days. The department contracts with Recovery Monitoring Solutions for installation, monitoring, and interpretation of both SCRAM and GPS technology. The department employs a CSO II that reviews reports, invoices, assists with device installation, monitoring, and interpretation, and ensures that programs are correctly entered. 50% of this officer's salary is paid through CC funds.</p>				
15	Mentally Impaired (MHI) Caseload	Mental Health Initiative MHI-01		CC/DP
<p>These two caseloads work collaboratively with Amarillo's local mental health authority, Texas Panhandle Centers (TPC) with the assistance of the Texas Correctional Office for Offenders with Medical or Mental Impairments (TCOOMI). TPC case managers meet with the defendants and their community supervision officer regularly, and together they coordinate not only meeting criminal justice issues but also medication and psychiatric services for the probationers. Most defendants remain on the caseload for extended periods of time or even the duration of their supervision.</p>				

21	Drug Court	Drug Courts DCT-02		BS/OOG Grant
This caseload entails the supervision of defendants who are in the Potter, Randall and Armstrong Counties Drug Court. The Potter, Randall and Armstrong Counties Drug Court is funded by a Governor's Grant through the CSCD that covers a portion of both the CSO and Counselor salary as well as program supplies, GPS/SCRAM and drug testing. The target population for the drug court are probationers who not only present high needs for substance abuse but also exhibit high criminogenic risk. See below for a more detailed summary of the Drug Court Program.				
24	Drug Court Aftercare Caseload	Specialized Caseload Substance Abuse Caseload SCPS-01		CC/DP
This caseload supervises defendants who have completed Drug Court and SAFFP. Program staff respond effectively to violation behavior and pro-social behavior, provide more intensive services initially, and then diminish the intensity over time, based on participant behavior.				
25	Domestic Violence Caseload	Specialized Caseloads Aggressive Behavior Violence SCPV-01		BS
These three caseloads provide specialty supervision to felons and misdemeanants who are on supervision for domestic violence. Participants must attend Batterers' Intervention Prevention Program (BIPP) or Women Anger and Violence Program (WAV). This program can last up to two years.				
26	Domestic Violence Pretrial Diversion (DV-PTD)	Pre-Trial Services PTR-04		CC/DP
This caseload provides supervision for assaultive cases that are placed on pre-trial diversion. The participants are required to attend Family Violence Intervention Program. This program can last up to two years.				

## **Specialty Court Summary**

### **181<sup>st</sup> Drug Court:**

In October 2010, the Potter, Randall and Armstrong Counties CSCD in collaboration with and under the supervision of the judiciary, established Accountability Court which would later transition into the 181<sup>st</sup> Drug Court. The Drug Court program utilizes a multi-disciplinary team approach by coordinating efforts of the judiciary, CSCD, District Attorney's offices, defense attorney, local mental health authority, and substance abuse counselors.

The Drug Court has the following essential characteristics:

- alcohol and other drug treatment services in the processing of cases in the judicial system
- the use of a non-adversarial approach involving prosecutors and defense attorneys to promote public safety and to protect the due process rights of program participants
- early identification and prompt placement of eligible participants in the program; access to a continuum of alcohol, drug, and other related treatment and rehabilitative services
- monitoring of abstinence through weekly alcohol and other drug testing
- a coordinated strategy to govern program responses to participants' compliance; ongoing judicial interaction with program participants
- monitoring and evaluation of program goals and effectiveness
- continuing interdisciplinary education to promote effective program planning, implementation, and operations
- development of partnerships with public agencies and community organizations

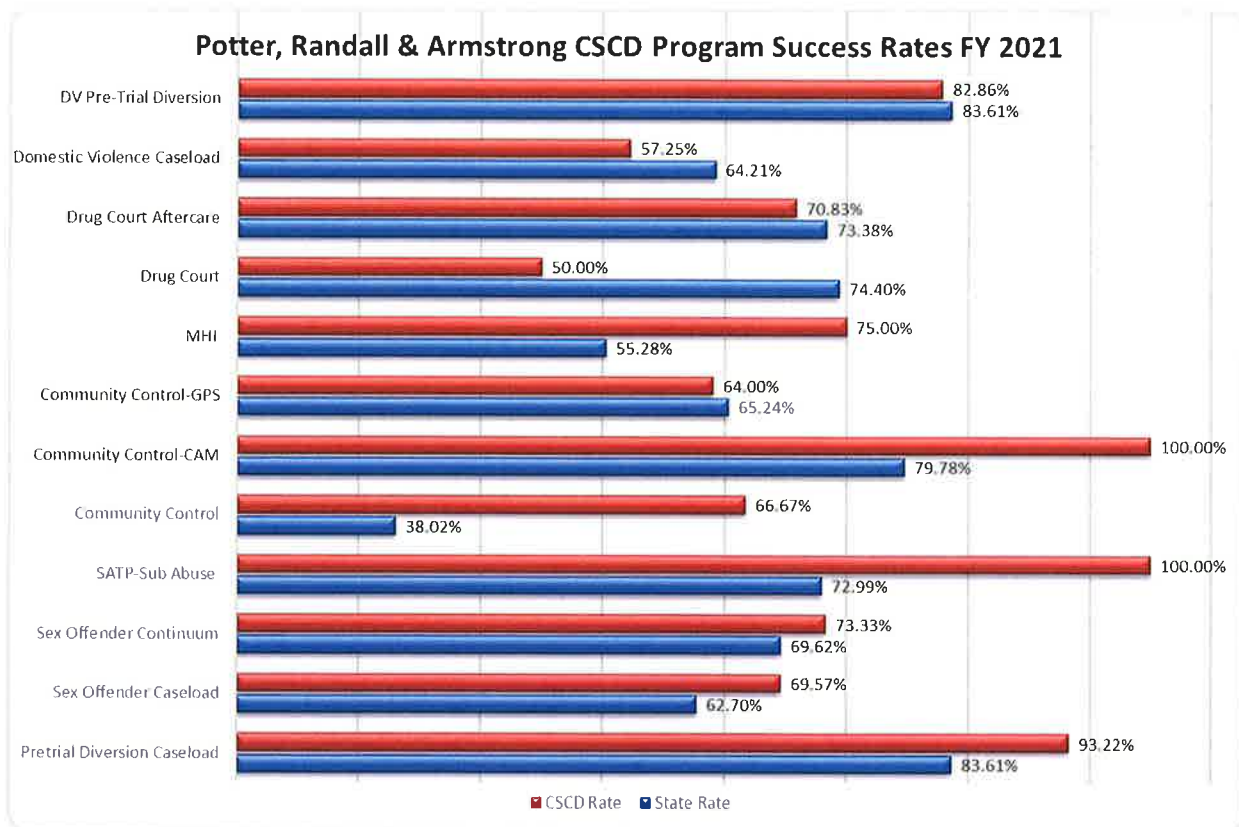
The target population consists of probationers who not only present high needs for substance abuse but also exhibit high criminogenic risk. The program can last up to eighteen months. The 181<sup>st</sup> Drug Court utilizes evidence-based practices referenced in the Adult Drug Courts Best Practice Standards Volumes I and II. The Drug Court is funded by a Governor's Grant through the CSCD that supports a portion of both the CSO and counselor salaries as well as program supplies. GPS/SCRAM and drug testing. The remainder of both the CSO and counselor salaries are paid out of Basic Supervision. In 2019, the program was expanded once again to add a grant funded Drug Court Aftercare caseload. This program allows the CSCD to maintain a balance of accountability, supervision, support, and encouragement even after the client has successfully completed Drug Court.

**Veteran's Treatment Court & Panhandle Regional Problem-Solving Court:**

This year, the Potter County District Attorney's Office developed and implemented the Veteran's Treatment Court and Panhandle Regional Problem-Solving Court. The Veteran's Treatment Court serves qualifying veterans placed on adjudicated or deferred probation as well as qualifying veterans placed on pre-trial diversion. The Panhandle Regional Problem-Solving Court diverts participants with mental health needs from the traditional criminal justice system. These are both court-supervised programs for justice involved persons needing frequent appearances with the Judge, individualized treatment plans and case management services, and other treatment and intervention options to maintain long-term recovery and reduce recidivism. These courts are both funded by Potter County.

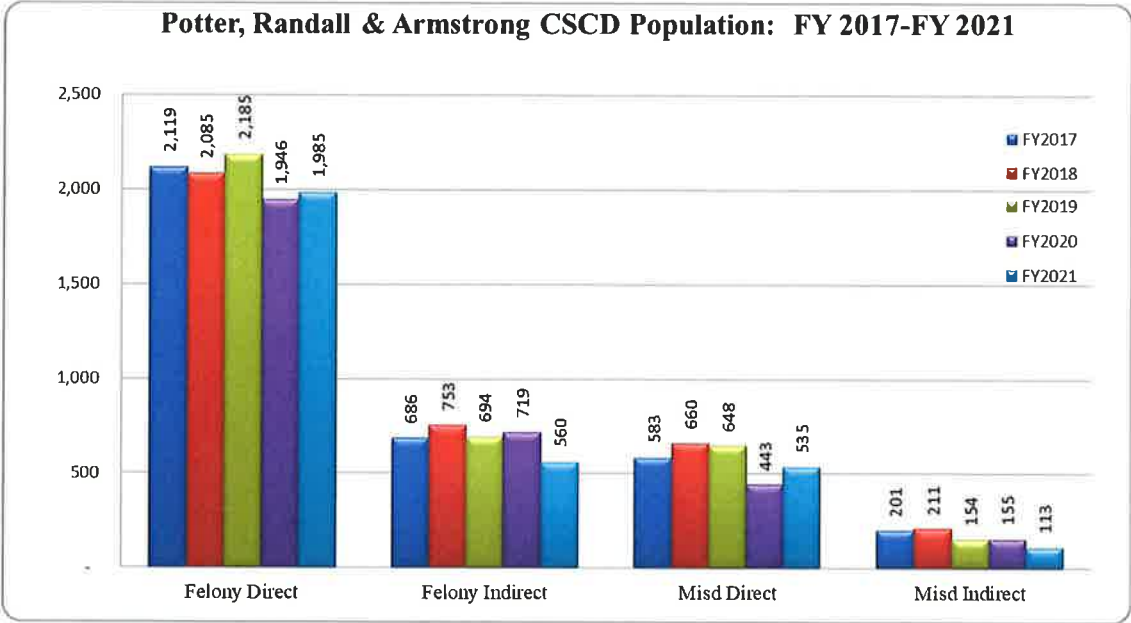
# Program Success Rates

Using program data submitted to the Community Supervision Tracking System-Intermediate System (CSTS-ISYS), TDCJ-CJAD calculates program success rates for each fiscal year. These rates are made available to each CSCD. Statewide rates are calculated for each program type so CSCDs can compare their program to all programs of the same type in the state. Success rates are calculated using the following formula: Completions / (Completions + Revocations + Absconded + Violations). While some of the success rates fall below the state average, many exceed the state average. The department continuously evaluates the local success rate and strives for improvement.

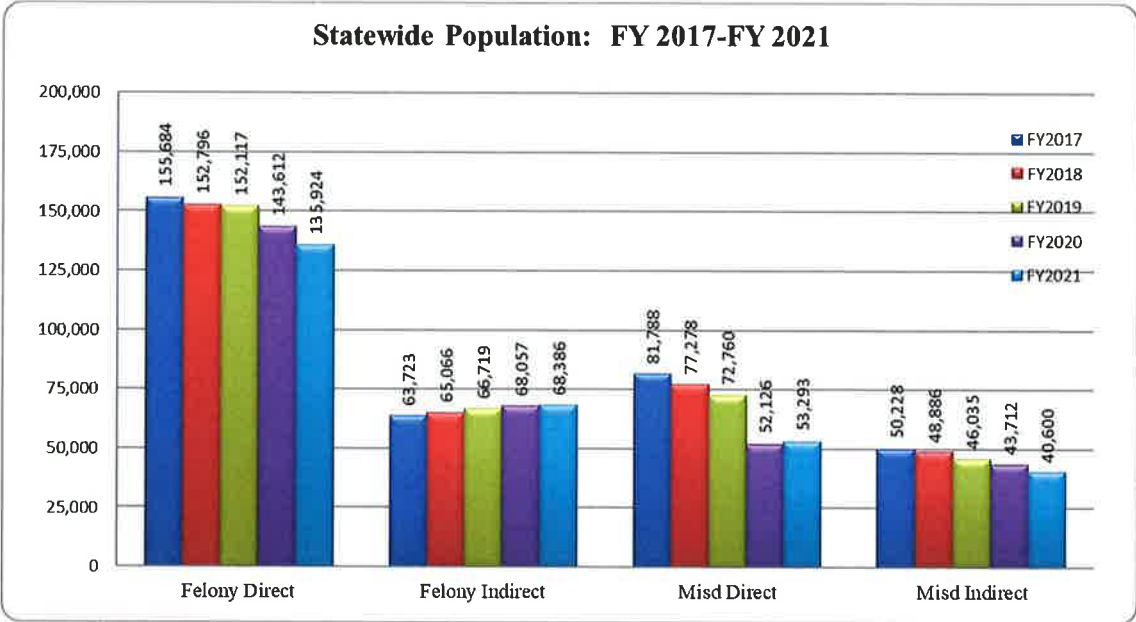


# Probationer Population

Overall state probation population has been steadily decreasing over the last five years. Potter, Randall and Armstrong Counties experienced a significant drop in both felony and misdemeanor direct cases during FY2020, but an increase in FY2021. The overall population of defendants on probation is a reflection of the number of probationers who have been placed on community supervision.



*\*Defendants on "indirect supervision" are those who were placed on probation in Potter, Randall or Armstrong Counties, but are now residing outside of the county, due to transfer to another county/state or residential treatment in another county. "Indirect supervision" also includes defendants who have absconded.*

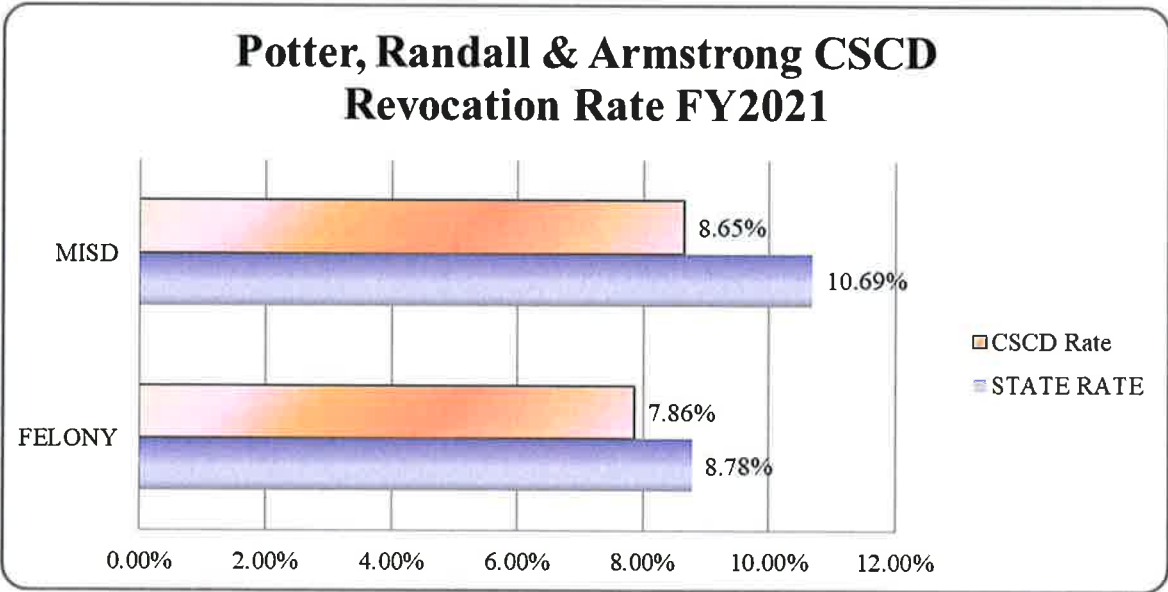


# Revocations

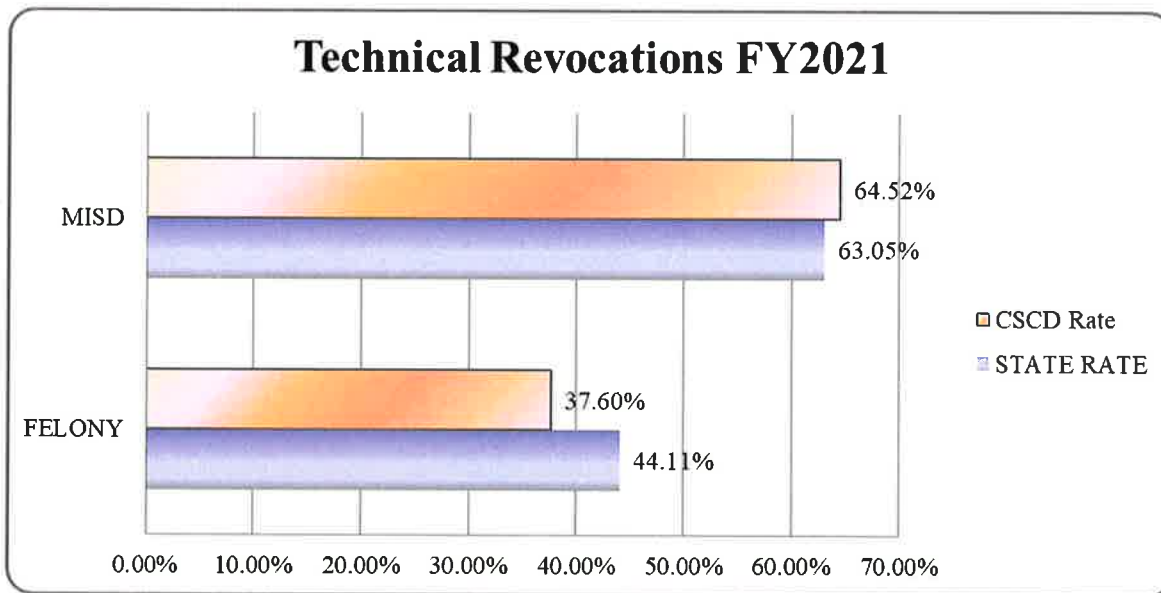
The Potter, Randall and Armstrong Counties CSCD itself does not revoke defendants and sentence them to incarceration (nor does any CSCD in the state of Texas). That is the sole job of the courts. Data cannot be extrapolated from these statistics to determine the effectiveness of the department nor its vision.

As requested by the state, this data is being included in this strategic plan. It is the opinion of this CSCD that once the courts review the allegations and decide to revoke the defendant, they have done so appropriately. Another fact that must be presented about revocations is that many times there are plea bargain agreements between the District Attorney's office and the attorney representing the defendant for an agreed incarceration. Most often the judge will accept the plea bargain and revoke the defendant.

Revocations are not necessarily an indicator of the CSCD's lack of implementing progressive sanctions/interventions. There are many examples of defendants wishing to serve their time instead of remaining on supervision. For example, if a defendant has committed a subsequent arrest, any prior pre-trial jail incarceration period specific to the case, any time spent in a lockdown facility (e.g. SAFPF, CRTS, SATF, ISF, etc.) will count towards their revocation sentence. There have been several occasions that when the time is added up, the defendant has already met their sentence period and can simply be revoked and discharged with "time served". Often those charged with misdemeanor offenses, can do their time more quickly than they can complete a treatment program. Another example may be the defendant has committed a higher degree offense which involves a larger penalty range and the plea bargain is to accept revocation for the existing probation and the longer sentence offense will be dismissed. Many defendants gladly accept this offer as sometimes it will shorten their sentence significantly. Though our revocation rates are lower than the state average, we do not feel that they are an appropriate measure of CSCD success.



# Technical Revocations



While the above graph indicates that the department is significantly below the state average regarding felony technical revocations, reducing revocations is not our primary focus. Changing behavior and improving lives is the primary goal of the programs, interventions, officers and staff of the department. The Potter, Randall and Armstrong Counties CSCD has worked closely with the courts, the prosecutors, local defense attorneys, and other community resources to address noncompliance in a purposeful and effective manner. The department is committed to the kinds of programs that have been shown to improve lives. Among the approaches we use are the following:

- Use of the Texas Risk Assessment System, an evidence-based and validated assessment that identifies both risk and criminogenic needs.
- Appropriate case planning that incorporates both short and long-term goals
- Substance abuse/mental health assessments and prompt referral to appropriate level of services needed
- The use of specialized caseloads
- In-house substance abuse counselors who work closely with the officers
- Specialty courts that address substance use, Veteran's needs, and emotional stability
- Development of partnerships with public agencies and community organizations that can meet the individualized needs of our clients
- Use of a cognitive behavioral/educational programming
- Random drug and alcohol tests with prompt referral to appropriate services
- An emphasis that the recommendation of revocation should be for probationers who present a danger to the community versus those who are merely non-compliant

## Statewide Goal – Prison Diversion

### Increase Successful Completions of Supervision

The Potter, Randall and Armstrong Counties CSCD is committed to providing effective interventions that improve lives for a safer community. This CSCD remains committed to providing every person placed on community supervision the opportunity, resources, and accountability needed to complete their term of supervision successfully. We intervene when appropriate and make recommendations to help change criminogenic attitudes and or beliefs.

**Goal:** Potter, Randall and Armstrong Counties CSCD will divert defendants from prison by increasing successful terminations, reducing technical revocations, and increasing program successful completions.

Data Elements	State FY2020	CSCD FY2020	State FY2021	CSCD FY2021	CSCD FY2022 Target	Percent Difference Target
Successful Completions – Felony	61.66%	53.53%	63.34%	60.78%	62.78%	2.00%
Successful Completions – Misdemeanor	84.37%	81.17%	84.12%	82.63%	84.63%	2.00%
Technical Revocations – Felony	47.47%	41.14%	44.11%	37.60%	36.00%	1.60%
Technical Revocations – Misdemeanor	64.19%	56.70%	63.05%	64.52%	63.00%	1.52%
<b>Program Success Rates</b>						
#21 Drug Court	74.62%	76.92%	74.40%	50%	60.00%	10.00%
#22 Drug Court Aftercare Caseload	70.83%	72.39%	73.38%	70.83%	73.00%	2.17%

<b>Objective #1:</b> Increase successful completions of supervision by 2% for felonies and 2% for misdemeanors by assessing and supervising defendants accurately. These percentages will be compared annually.		
<b>Reasoning:</b> Accurate assessments efficiently allocate supervision resources and structure decision-making in a manner that reduces the likelihood of recidivism. Accurate assessments classify the risk level of the individual while also identifying both criminogenic needs and barriers to programming. This allows the CSO to focus on the correct needs.		
<b>Strategy #1</b>	Ensure that each CSO is trained in TRAS and Case Planning and attend a yearly refresher	<b>Target Date</b>
<b>Performance Measure</b>	At least 90% of CSOs will be trained in TRAS/Case Planning within the first year of hire and yearly.	The CSCD will begin immediately and will continue throughout FY2025.
<b>Strategy #2</b>	CSOs will utilize skills learned in TRAS/Case Planning training to supervise defendants at appropriate levels of supervision.	
<b>Performance Measure</b>	CSCD will conduct internal case management audits for quality control on accuracy of assessment and have at least 90% success rate of cases assessed correctly.	



<b>Objective #2:</b> Reducing technical revocation by 1.60% for felonies and 1.52% for misdemeanors by communicating effectively with defendants in a kind and respectful manner to help increase buy-in of their successful completion of supervision. These percentages will be compared annually.		
<b>Reasoning:</b> Though this CSCD does not believe that a reduction in technical revocations should be attributed to the CSCD, we strive to communicate effectively with the defendants to help increase buy-in of their successful completion of supervision which may result in a reduction of technical revocations.		
<b>Strategy #1</b>	Ensure that each CSO is trained in Motivational Interviewing within one year of their hire date.	<b>Target Date</b>
<b>Performance Measure</b>	Yearly verification of training records that each CSO has been trained properly.	The CSCD will begin immediately and will continue throughout FY 2025.
<b>Strategy #2</b>	Conduct internal audits to ensure that MI skills are being used in an effective manner.	
<b>Performance Measure</b>	CSCD will conduct internal case management audits of chronological entries to determine if CSO is utilizing MI skills effectively.	

<b>Objective #3:</b> Increasing Program successful completions at the rate of 10% for Drug Court and 2.17% for Drug Court Aftercare and maintain or improve other program success rates by making appropriate referrals and entering data correctly. These percentages will be compared annually.		
<b>Reasoning:</b> If proper codes are not used, the success rate of the CSCD will be incorrect.		
<b>Strategy #1</b>	Ensure that defendants are referred to the appropriate programs.	<b>Target Date</b>
<b>Performance Measure</b>	CSCD will conduct internal case management audits of chronological entries to determine if the CSO is making appropriate referrals.	The CSCD will begin immediately and will continue throughout FY 2025.
<b>Strategy #2</b>	Train staff on the importance of program date entries and appropriate use of discharge codes to ensure that proper codes are used.	
<b>Performance Measure</b>	CSCD will conduct internal case management audits of programs and cases revoked to determine if CSO entered proper code.	

# Potter, Randall and Armstrong County CSCD Goal Constant Evaluation and Improvement

**Goal:** Throughout the next year, the Potter, Randall and Armstrong Counties CSCD will evaluate department strengths and challenges and will provide opportunities for learning and improvement.

<b>Objective #1:</b> CSCD will utilize technical assistance from CJAD and other training to identify strengths and areas of improvement.		
<b>Reasoning:</b> People perform better when they understand the expectations and when mistakes are used as an opportunity for learning and improvement when possible.		
<b>Strategy #1</b>	CSCD will update all job descriptions and policies and procedures manual and will make sure that all employees have access to the final versions.	<b>Target Date</b>
<b>Performance Measure</b>	In the next year, CSCD will update policy, procedure, and standard operating procedures and will ensure that every officer is trained appropriately regarding any updates made.	The CSCD will begin immediately and will continue throughout FY 2025.
<b>Strategy #2</b>	CSCD will develop and implement an internal audit policy which will measure progress, identify strengths and areas of improvement, and can be utilized as a training opportunity.	
<b>Performance Measure</b>	CSCD will ensure development and implementation of an internal audit policy no later than April 30, 2022.	