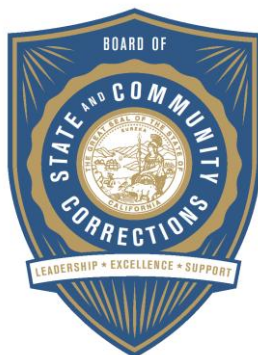


POLICY AND PROCEDURE MANUAL FOR TRAINING PROVIDERS

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BOARD OF STATE AND COMMUNITY CORRECTIONS

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I. INTRODUCTION

A. Purpose of the Manual

The goal of this manual is to provide policies and procedures for course certification, fiscal responsibilities, and billing and record keeping requirements.

B. Board of State and Community Corrections and the Standards and Training for Corrections Program

The Board of State and Community Corrections (BSCC) was established on July 1, 2012, and was formerly known as the Corrections Standards Authority (CSA), and prior to 2005, as the Board of Corrections (BOC). The BOC was created in 1944 to provide leadership and coordination in local California corrections. The BOC set minimum standards for local adult detention facilities and operations, and had statutory responsibility for establishing selection criteria and training standards for local corrections personnel (Sheriff, Probation, Police and Departments of Correction). These responsibilities continue under the BSCC and are defined in California Penal Code Sections 6024 through 6037.

The Standards and Training for Corrections (STC) program, established in 1980, is a division of the BSCC. The purpose of the STC program is to raise the level of competence of the state's local corrections and probation personnel. The program accomplishes this by developing selection and training standards, providing a course certification and delivery system, technical assistance and support, and training to local corrections agencies statewide. In addition, participating agencies are allocated subvention funding through the STC program.

Through research, planning, design, and assessment, the STC program assists local agencies in ensuring they select and train qualified personnel and maintain staff proficiency through job-related skills training. Job-relatedness is defined as a demonstrable relationship between the course subject matter and the job being performed.

STC is charged with the following responsibilities:

- assisting local corrections agencies in selecting qualified persons for employment and maintaining staff proficiency;
- promoting development of an efficient and effective training delivery system;
- providing technical assistance and support to all participating agencies and providers; and,
- developing selection and training standards for local corrections personnel.

Counties and cities participate in the STC program voluntarily. Through their participation, agencies receive STC support and subvention funding and agree to follow all program regulations, policies, and procedures. Local corrections agencies participating in the STC program may use this state funding to help pay course tuition costs in addition to other allowable expenses.

The regulations for counties and cities that choose to participate in the STC program are found in Title 15, Division 1, Subchapter 1, Articles 1 through 9, Sections 100-358 of the California Code of Regulations (CCR).

C. Becoming an STC Training Provider

STC is committed to working closely with training providers and agencies to promote the delivery of quality training. STC assigns a field representative to every training provider and participating agency. STC field representatives are available to provide technical assistance, program support, and consultation about all aspects of the STC program

In order to become an STC training provider, interested parties must apply through the BSCC website. Applicants will be contacted by an STC field representative to review the application. Upon approval, applicants will be issued a user ID and PIN, which will allow access to the STC on-line course certification system.

II. CATEGORIES OF TRAINING

The two categories of STC-certified courses are core training and annual training.

A. Core Training Standards (Title 15, Section 171 CCR)

Core training consists of entry-level or basic training linked to specific job classifications within the first 12 months of appointment to a position.

The BSCC has identified the following six specific training courses as core training:

- a) **Probation Officer Core Course** (Title 15, Section 173 CCR)
The Probation Officer Core Course consists of a minimum of 196 hours of instruction in specific performance objectives. Entry-level staff must successfully complete this course by showing a satisfactory level of proficiency on relevant achievement tests. This training shall be completed in the first year of job assignment as a probation officer.
- b) **Juvenile Corrections Officer Core Course** (Title 15, Section 176 CCR)
The Juvenile Corrections Officer Core Course consists of a minimum of 160 hours of instruction in specific performance objectives. Entry-level staff must successfully complete this course by showing a satisfactory level of proficiency on relevant achievement tests. This training shall be completed in the first year of job assignment as a juvenile corrections officer.
- c) **Adult Corrections Officer Core Course** (Title 15, Section 179 CCR)
The Adult Corrections Officer Core Course consists of a minimum of 176 hours of instruction in specific performance objectives. Entry-level staff must successfully complete this course by showing a satisfactory level of proficiency on relevant achievement tests. This training shall be completed in the first year of job assignment as an adult corrections officer.
- d) **Adult Corrections Officer Supplemental Core Course** (Title 15, Section 180 CCR)
The Adult Corrections Officer Supplemental Core Course consists of a minimum of 56 hours of instruction in specific performance objectives. It is designed for the adult corrections officer who has successfully completed the Peace Officers Standards and Training (POST) Basic Academy Course. Entry-level staff must successfully complete this course by showing a satisfactory level of proficiency on relevant achievement tests. This training shall be completed within the first year of job assignment as an adult corrections officer.

e) **Supervisor Core Course** (Title 15, Section 181 CCR)

The Supervisor Core Course consists of a minimum of 80 hours of instruction to be completed during the first year of assignment as a supervisor in a jail/adult institution, juvenile institution, or probation department.

f) **Manager and Administrator Core Course** (Title 15, Section 182 CCR)

The Manager and Administrator Core Course consists of a minimum of 80 hours of instruction to be completed during the first year of assignment as a manager or administrator.

For those training providers who wish to certify and deliver core training, review of and adherence to additional publications is required, specifically:

- Policy and Procedure Manual for Presenting Local Corrections Core Courses
- Core Course Manual(s)
- Physical Tasks Training Manual(s)

B. Annual Training Standards (Title 15, Section 184 CCR)

Annual training is mandatory for all STC-eligible staff who have completed core training.

Annual training content is not prescribed by STC. It can be specialized or refresher training that develops or enhances job-related skills. Flexibility is permitted in course content and method of instruction in order to meet changing conditions and local needs.

During any fiscal year, each eligible staff shall complete at least the following minimum number of hours of job relevant annual training:

Journey Probation Officer	40 hours
Journey Juvenile Corrections Officer	24 hours
Journey Adult Corrections Officer	24 hours
Probation Supervisor	40 hours
Supervising Juvenile Corrections Officer	40 hours
Supervising Adult Corrections Officer	24 hours
Manager *	40 hours
Administrator *	40 hours

* Managers and administrators of jails or adult institutions may only need to comply with a minimum of 24 annual training hours per year if the participating agency has been granted a waiver by the BSCC board.

III. COURSE CERTIFICATION

The intent of the course certification process is to provide high quality, job-relevant training. Certification of a course authorizes the training provider to advertise it as meeting the requirements of STC.

A. Overview of Course Certification

A certified course consists of job-related instruction approved by STC for local corrections personnel. Job-relatedness is established when the relationship between the training and the job is defined.

To receive STC certification, training providers must submit a request for certification (RFC) to STC. The application is submitted on-line via the BSCC website. STC staff reviews all requests. Approved STC certifications are valid for a maximum of one year.

All certification requests must be sponsored by a local STC-participating agency (except when an STC-participating agency is the provider).

Sponsoring a course indicates that the administrator or training manager of an agency has reviewed the course and has concluded that it is relevant to the training needs of local corrections agencies. The act of sponsoring signifies a need for the course and is a prerequisite to STC certification. Sponsorship promotes a close working relationship between training providers and agencies in developing needed courses. When a training provider completes the on-line request for certification, the course will automatically be sent to the local agency designated by the training provider. The sponsoring agency will review the course on-line, and if sponsored, the course will automatically be forwarded to STC.

Course certification requirements include, but are not limited to the following criteria:

- job-related topic, content, and performance objectives;
- a demonstrated need for the course;
- a demonstrated capability to provide quality training;
- the cost of providing the instruction in relation to the benefits;
- the ability to provide the instruction within California; and,
- adherence to policies and procedures established by the STC.

Meetings of any type by any group or organization will not be certified.

B. Certification Number

Upon certification, STC assigns each course a ten digit number. The first four digits are the provider or agency's user identification number and the final six digits are the course identification number. These two numbers, separated by a hyphen, constitute the complete course certification number.

The STC ten-digit course certification number must be printed on all announcements, brochures, bulletins, or other publications soliciting participation by STC local corrections personnel. Providers cannot advertise the class as certified until official notice of certification has been received. Providers cannot advertise a course as pending STC certification.

C. STC Course Catalog and Calendar

STC maintains a course catalog and calendar on the BSCC website. The catalog is updated continuously and contains summary information on every course certified by STC except for courses designated as being agency specific. The course calendar provides current information on upcoming course presentation dates and locations.

Training providers are required to provide the STC program with timely, accurate, and updated information so the calendar will be current and accurate. Providers may add additional presentation dates any time prior to the delivery date. Such additions are made using the on-line system.

D. Course Attendance, Changes, and Cancellations

Participating agencies have discretion in choosing training providers and courses to meet training needs. For this reason, and because STC certification does not guarantee course attendance, it is incumbent upon the provider to establish and maintain effective communication with participating agencies and training managers. This will ensure the training corresponds to the agency's needs and that the agency will enroll a sufficient number of trainees. When agencies enroll trainees in an STC-certified course, they incur an obligation to the provider. The terms and conditions of this obligation are negotiable between the agency and the provider.

Training providers must notify agencies that have registered participants of any changes in a certified course as soon as possible, but not less than ten calendar days before the class. Such changes may include, but are not limited to, course length, dates, instructors, and course size.

Local corrections agencies are required to notify the training provider of cancelled enrollments a minimum of 15 calendar days before the course. If an agency has enrolled a specific number of trainees in a certified course and that number of trainees does not attend the course without giving the required 15 calendar day notice, the provider may charge the agency the cost of tuition for absent trainees.

At times, circumstances warrant a provider to cancel a scheduled course. The provider must notify all agencies with registered trainees of the cancellation at least ten calendar days before the first scheduled day of the course.

Exceptions to the ten-day policy will be considered on a case-by-case basis when an emergency occurs, such as illness of the instructor, transportation issues, etc. If the emergency occurs ten calendar days or less before the scheduled training, providers must also notify STC as well as agencies with registered trainees immediately. Low trainee enrollment is not considered adequate reason to cancel a course with less than ten calendar days notice to agencies.

A directory of participating agencies and training providers is available on the BSCC website. This directory lists the names, addresses, and phone numbers of all agency administrators and training managers.

E. Course Monitoring

STC staff may monitor any certified course. Staff determines whether the course objectives are being met and evaluate the course quality and costs. Monitoring may include, but is not limited to:

- determination of adherence to the RFC;
- review of lesson plans;
- analysis of instructor's presentation;
- review of trainee feedback; and,
- review of fiscal records.

IV. REQUEST FOR CERTIFICATION SYSTEM

A Certification of Courses

Requests to certify annual courses must be submitted to STC through the on-line course certification system a minimum of 20 calendar days prior to the first course offering. Requests to certify new core courses must be submitted to STC at least 60 days prior to the first course presentation. Additional time may be necessary if providers are:

- new to the STC program;
- requesting certification of a course for the first time; or,
- presenting a new course requiring agency sponsorship.

The advance filing time allows STC field representatives the opportunity to review the request, discuss and resolve any concerns, and certify the course. RFCs not submitted on time may result in the inability to present the course as scheduled.

Although the process for certifying annual and core courses is the same, there are some differences in the information required for certifying core courses; e.g., mandated performance objectives, required testing, etc. For further information regarding core course requirements please refer to the *Policy and Procedure Manual for Presenting Local Corrections Core Courses*, the appropriate core course manual, and if applicable, the appropriate physical tasks training manual.

The RFC process consists of six steps:

1. Course Information
2. Face Sheet
3. Performance Objectives
4. Instructor Information
5. Course Outline
6. Course Dates

Additional requirements include:

- Assurance Statement
- Agency Sponsorship

B. Request for Certification Steps

The provider will enter the following information when submitting an RFC:

1. Course Information

- Course Title
- Course Contact Information

2. Face Sheet

- Course Type - Annual or Core
- Primary Population (Adult or Juvenile Corrections Officer, Probation Officer, Supervisor, Manager/Administrators)
- Course Hours
- Agency Specific - designate if course is designed to be attended only by personnel from one agency due to specific content and/or tailored to the agency's specific policies
- One-Time Presentation - designate if the course is to be presented just once
- Course Summary - describe the course content; this information will be available for viewing on STC's on-line course catalog and calendar

3. Performance Objectives

Certification of each course requires clearly stated performance objectives. STC emphasizes objectives as a means to enhance and evaluate training quality. Well constructed objectives provide direction for those who teach the course, focus the trainee's learning, and serve as a means to evaluate the course.

For course certification, write specific and measurable performance objectives that clearly indicate the job-related knowledge or skill that trainees will be able to demonstrate upon course completion. Specify what the trainee will be able to do, under what conditions, and at what acceptable level. This is not required for core courses, as the objectives are contained in the core course manual.

Examples:

- Without reference to the medical screening handbook, the trainee will be able to describe at least three major symptoms of alcohol withdrawal.
- Given a list of behaviors, the trainee will be able to differentiate between those that are normal and those that are schizophrenic.
- Given a diagram of the jail, the trainee will identify five emergency escape routes within 60 seconds.

For additional information on writing performance objectives, please refer to the STC publication *A Guide for Writing Performance Objectives for STC Annual Course Certification* available on the BSCC website.

4. Testing Procedure

Select and click on the box designating the appropriate test(s) type. Tests and a testing policy are required in all core courses. Refer to the *Policy and Procedures Manual for Presenting Local Corrections Core Courses* on the BSCC website for more testing information regarding core. While testing for annual courses is not required, it is highly desirable. Testing can indicate mastery of the performance objectives, demonstrate the effectiveness of training, and provide results to agencies.

5. Instructor Information

The instructor information page demonstrates the qualification of each course instructor. Formal résumés are not required and cannot substitute for the completed instructor information sheet. Submit information that directly relates to the course as well as any other course delivered by that instructor. It should reflect the instructor's:

- expertise in the subject area;
- work experience related to the topic;
- areas of related training experience;
- education and training received; and,
- completion of relevant instructor preparation courses.

Although all sections need not be completed, enough information should be provided to demonstrate the instructor's qualifications to instruct in the specific subject area(s) identified as his or her responsibility in the course outline.

The instructor's information sheet is maintained in the RFC database. When updating the instructor's information sheet, it is best to be comprehensive and add, rather than delete, information.

For courses that rely on current proficiency or license of the instructor, the training provider has the responsibility for ensuring that the instructor possesses the required credentials. Examples of courses that require this level of care and documentation include CPR, first aid, firearms, chemical agents, use-of-force topics, and courses intended to impart skills considered to be necessary for high risk activities. The provider must clearly state that the instructor possesses the

applicable, currently valid, license, certificate, or training in the appropriate data field or in the space provided for narrative.

6. Course Outline

Submit a detailed hour-by-hour course outline for each day of the course. Designate the lunch break and at what point in the training day it will occur. It is not necessary to document other short breaks. The course outline should include sufficient detail for STC staff to evaluate/identify:

- course content;
- job-relatedness;
- relationship between content and performance objectives;
- instructional methodology (check all methodologies that apply for any given segment); and,
- which primary instructor will be teaching each segment.

On the course outline page of the certification request, the text box for each segment entitled “Subject or Topic” provides ample room for detail. Design constraints of the application limit individual instructional segments to a maximum of 12 per day. You must organize your outline in a manner that allows you to describe your course as completely as possible within the 12 available segments.

7. Lesson Plans

STC-RFC courses (annual and core) must have written lesson plans. The lesson plan must be made available to the STC field representative upon request.

Best practices indicate detailed lesson plans enhance the development and delivery of training. Lesson plans help ensure quality training delivery by providing detailed information about the delivery of instructional objectives, instructional methodology, testing, and classroom activities. Furthermore, lesson plans provide written documentation of training.

STC does not require a standardized format; however, the lesson plan must be in such detail that a substitute instructor with requisite knowledge of the subject could teach from the lesson plan without contacting the instructor for clarification. Samples of lesson plans and blank lesson plan templates are available on the BSCC website.

Along with the approved RFC, all STC-RFC lesson plans must contain the following components:

- **Room Set-Up**
How the classroom needs to be set up (e.g., classroom style, small group, theater, etc.).
- **Instructor Material(s)/Equipment Needed**
All material and equipment needed, including handouts and reference material for the class or module.
- **Time for Each Section or Exercise/Activity**
The beginning and end time or amount of time needed for each exercise/activity, section, or topic.
- **Trainer's Speaking Notes**
Any notes to remind the trainer of anything pertinent in that section. This may include key concepts, targeted responses, activity instructions, etc. It is not necessary to capture everything the instructor will say, for example, stories drawn from the instructor's own experience to illustrate or underscore a key concept would not necessarily be included. This should be written to a level that a person that is familiar with the content and course could step in and complete the training.
- **Handout/Classroom Materials**
The distribution of handouts and classroom materials should be noted in the section of the lesson plans where the distribution occurs.
- **Testing Type and Description of Behavior Skills Test (BST)/Written Skills Test (WST) completion (if applicable)**
The type of test(s) to be given in the class or module; i.e., Multiple Choice Test (MCT), Job Knowledge Test (JKT), BST, and WST. Describe in writing each BST and WST to be completed in the class or module. This can be attached to the lesson plan as a handout and labeled appropriately as to when to administer it.

8. Course Dates

Enter each course presentation date in the RFC system. These dates are automatically added to the on-line course calendar, which is viewable by participating agencies seeking training courses. The RFC system requires a start date, end date, and location for each course presentation. For all course certification requests, at least one proposed course delivery date must be listed. As course dates change, are added or deleted the provider should update the

information in the RFC system. This can be accomplished by clicking on the “Dates” hyperlink for the course in the RFC system.

C. Additional Requirements

1. Assurance Statement

Place a check mark next to the assurance statement signifying that the training provider will adhere to the STC program policies, procedures, and regulations in course delivery, documentation, billing, lesson plan preparation, and that all information included in the RFC is accurate.

2. Agency Sponsorship

At the conclusion of the on-line application process, select an STC-participating agency to review the course for purposes of sponsorship. Once the agency is selected, the entire RFC will be sent to the specified agency for on-line review. When the local agency sponsors the course, it will be automatically forwarded to STC for review and certification. By sponsoring the course, the agency is representing to STC they have thoroughly reviewed the entire RFC for job relevance, quality, and accuracy. STC-participating agencies acting as their own training provider are not required to fulfill the course sponsorship process.

Note: For core courses, the provider should select the BSCC as the sponsoring agency.

D. Tuition

Tuition is the STC-authorized amount charged by the training provider for trainees attending STC annual or core courses. Tuition does not include registration fees that may be charged by a training provider. Registration fees are typically associated with conferences, and are designed to cover costs other than training delivery and cannot be paid with STC funds.

All RFCs submitted to STC with a cost of \$100.00 per trainee per eight-hour training day (or an hourly rate of \$12.50 per trainee) are deemed to be cost effective and do not require a budget. For example, 4-hour course=\$50.00, 8-hour course=\$100.00, 16-hour course=\$200.00, etc. The cost of up to \$100.00 per trainee per day is intended to cover all course costs associated with course delivery, including instructor fees, materials, room rental, travel, and per diem.

In some instances, course costs may exceed \$100.00 per eight-hour day per trainee, in which case the provider will be required to submit a budget for justification. These courses will be reviewed by STC on a case-by-case basis. The costs associated with

this higher rate should be detailed in a letter mailed to the provider's field representative.

The letter must include written justification for costs, and be co-signed by the provider and the agency administrator of the sponsoring agency. The letter must address the following issues:

- the unique nature of the course;
- the need for the additional expenses in relationship to the course to be provided;
- the actual total costs incurred for the training;
- cost per trainee;
- instructor qualifications;
- need and justification for course; and,
- description of target audience.

Additionally, for courses where costs may exceed \$100.00 per eight-hour day per trainee, documentation is required for:

- cost of instruction and on-site coordination;
- costs of training aids/equipment rental and one-time costs;
- training room rental; and,
- instructor and on-site coordinator travel and per diem.

For all courses, providers must maintain adequate accounting records in accordance with generally accepted accounting principles. The records must provide an audit trail that will permit tracing of transactions from support documentation to accounting records, financial reports, and billings.

E. Recertification of Courses

STC course certification is valid for one year and a provider must apply for recertification annually. To submit the course for recertification, go to the RFC work base and submit the course to STC using the "Recert" hyperlink. If the certification is not renewed within 90 days following the expiration date, the course is placed in inactive status and will not be accessible through the RFC system.

In preparing a request for recertification, it is important that providers perform a comprehensive review of the course, as certified, and update as needed. Additionally, if major changes are proposed to the course, it should be recertified. Changes in the law, correctional practices and instructors should be reviewed for currency as part of the recertification process.

F. Modification of Certified Courses

Modifications of a certified course include changes in an approved course, such as minor outline changes, new or different instructors, or other changes that do not affect the substance of the course. Additions or deletions of a scheduled course offering are not modifications. To submit the course for modification, go to the RFC work base, access the course through the “Modify” link, make the modifications, and then submit the course to STC for review and approval.

G. Dates

Course presentation dates may be added or deleted by using the “Dates” link on the RFC work base. It is important to keep course presentation dates accurate and up-to-date, as the dates are posted to the on-line STC catalog and calendar. Date changes do not need to be submitted to STC for approval.

V. RECORD KEEPING REQUIREMENTS

A. Course Rosters

Providers are responsible for accurately reporting and attesting to the number of hours of attendance of each trainee. Credit for actual classroom attendance is granted on an hour-for-hour basis. An STC course roster must be completed for each presentation of the course and a copy mailed to each trainee's agency within 30 days of the conclusion of the course. The original roster must be submitted to STC within 30 days of course completion.

B. Evaluation of Certified Annual Courses

The competency of local corrections personnel is, in part, achieved through continuous evaluation and improvement of STC-certified courses. Course evaluation by trainees is a vital element in this process.

Providers can download the required evaluation form from the BSCC website. Training providers shall provide completed course evaluations to the attending agencies upon the completion of each course. Providers are not required to send course evaluations to STC when submitting the original course roster.

Trainees should be given sufficient time to thoughtfully complete the evaluation form at the end of each course. They should be encouraged to complete the entire form and be reminded of the importance their responses play in assisting STC, training providers, and participating agencies in their efforts to improve the course content and delivery. They should also be reminded of the additional opportunity to submit course comments directly to the BSCC website.

Note: This policy does not apply to STC core courses. Evaluations for STC core courses are required and must be sent to STC upon completion of the course.

C. Records Retention

Training records should be retained in compliance with each provider's own records retention policy.

VI. SUSPENSION/REVOCATION OF COURSE CERTIFICATION

A. Causes for Suspension/Revocation

Causes for suspension/revocation of a training provider's course certification include:

- presentation of poor quality or non job-related courses as disclosed by trainee evaluations, agency feedback, STC monitoring of courses, or other sources; and,
- violation of STC program regulations, policies, and procedures, or not adhering to a contract for training services with a participating agency.

B. Process of Suspension/Revocation

If there appears to be sufficient cause to revoke a course certification, the following process will occur:

1. The STC field representative will initiate the proceedings by presenting the information to the deputy director of STC.
2. If the deputy director determines there is sufficient cause for action, the training provider will be sent a letter that will contain the following:
 - notification of and reason for suspension until the matter is resolved; and,
 - a request that the provider submit information that may affect the decision.
3. Provider must respond to STC's request for additional information within 15 working days. The deputy director will review the information, make a final disposition, and notify the provider by mail within ten working days. If the provider does not provide additional information within 15 working days, the course certification(s) will be revoked and the provider will be notified by mail within ten working days.

C. Effect of Suspension/Revocation

If a course certification is suspended or revoked, STC's name and course certification number may not be used or implied in any advertisement that is published after the date of the suspension or revocation.

Agencies will not receive credit toward STC's training requirements and cannot expend STC funds for courses after the certification is suspended or revoked.

It is the responsibility of the training provider to notify all agencies with registered trainees that the certification has been suspended or revoked. Failure to do so may result in agencies refusing to pay for course tuition.

D. Appeals

A provider or prospective provider of a course may appeal an STC staff decision. Such an appeal shall be filed within 30 calendar days of the notification of action with which the provider is dissatisfied to the deputy director of STC.

The appeal shall be in writing, and:

- state the basis for the dissatisfaction, including documentation; and,
- state the action being requested of the deputy director.

The deputy director will review the correspondence and related documentation and render a decision on the appeal within 30 calendar days, except in those cases where the provider withdraws the appeal. (The procedural time requirement may be waived with the mutual consent of the provider and the deputy director.)

The deputy director may render a decision based on the correspondence and related documentation submitted by the provider, and may consider other relevant sources of information deemed appropriate. The decision of the deputy director shall be in writing and shall provide the rationale for the decision.

If the provider is dissatisfied with the decision of the deputy director, he or she may file a request for review by the BSCC executive officer. Such a request shall be filed within 30 calendar days after receipt of the deputy director's decision. The requested review shall be in writing, and:

- state the basis for the dissatisfaction;
- state the action being requested of the executive officer; and,
- attach any correspondence related to the appeal.

The executive officer, after reviewing the appeal and the correspondence related to the review, may request additional information. After a decision is made by the executive officer, notice of the decision shall be mailed to the provider. The decision of the executive officer is final.

E. Conflict of Interest

Providers and participating agencies should be aware of a potential legal problem that may arise whenever staff of a participating agency is paid by a third party to provide

STC training. All participating agencies must adhere to county and agency policy on conflict of interest. It is recommended that the agency's legal counsel be consulted regarding this issue.