

COMMITTEE ON LEGISLATIVE RESEARCH
OVERSIGHT DIVISION

FISCAL NOTE

L.R. No.: 5990-01
Bill No.: SB 966
Subject: Administrative Law; Department of Corrections; Crimes and Punishment;
Criminal Procedure; Health Care; Health Care Professionals; Mental Health;
Department of Mental Health; Probation and Parole; Victims of Crime
Type: Original
Date: February 26, 2018

Bill Summary: This proposal modifies provisions relating to the administration of the criminal justice system.

FISCAL SUMMARY

ESTIMATED NET EFFECT ON GENERAL REVENUE FUND				
FUND AFFECTED	FY 2019	FY 2020	FY 2021	Fully Implemented (FY 2023)
General Revenue	Could exceed (\$4,589,797)	Less than \$16,883,445	Less than \$36,417,039	Less than \$54,782,620
Total Estimated Net Effect on General Revenue	Could exceed (\$4,589,797)	Less than \$16,883,445	Less than \$36,417,039	Less than \$54,782,620

ESTIMATED NET EFFECT ON OTHER STATE FUNDS				
FUND AFFECTED	FY 2019	FY 2020	FY 2021	Fully Implemented (FY 2023)
Crime Victims Compensation	(Unknown)	(Unknown)	(Unknown)	(Unknown)
Total Estimated Net Effect on <u>Other</u> State Funds	(Unknown)	(Unknown)	(Unknown)	(Unknown)

Numbers within parentheses: () indicate costs or losses. This fiscal note contains 16 pages.

ESTIMATED NET EFFECT ON FEDERAL FUNDS				
FUND AFFECTED	FY 2019	FY 2020	FY 2021	Fully Implemented (FY 2023)
Total Estimated Net Effect on <u>All</u> Federal Funds	\$0	\$0	\$0	\$0

ESTIMATED NET EFFECT ON FULL TIME EQUIVALENT (FTE)				
FUND AFFECTED	FY 2019	FY 2020	FY 2021	Fully Implemented (FY 2023)
General Revenue*	10 FTE	More than 10 FTE	More than 10 FTE	More than 10 FTE
Total Estimated Net Effect on FTE*	10 FTE	More than 10 FTE	More than 10 FTE	More than 10 FTE

*Does not take into account avoided additional FTE for the Department of Corrections

☒ Estimated Net Effect (expenditures or reduced revenues) expected to exceed \$100,000 in any of the three fiscal years after implementation of the act.

ESTIMATED NET EFFECT ON LOCAL FUNDS				
FUND AFFECTED	FY 2019	FY 2020	FY 2021	Fully Implemented (FY 2023)
Local Government	Unknown	Unknown	Unknown	Unknown

FISCAL ANALYSIS

ASSUMPTION

Officials from the **Department of Corrections (DOC)** state this legislation supports implementation of Justice Reinvestment Initiative (JRI) policy options developed by the Missouri State Justice Reinvestment Task Force. JRI is a data-driven approach to improve public safety and reinvest savings in strategies that can decrease crime and reduce recidivism.

Investment in community-based recovery support services provides an alternative to costly incarceration and is more effective in delivering improved outcomes for offenders. Currently, 86% of prison admissions are tied to either a) failures of people on community supervision or b) sentences to prison-based substance abuse or mental health treatment. Timely access to effective community treatment has the potential to reduce both types of prison admissions and is more cost effective.

The Council of State Governments (CSG) has been studying the criminal justice system in Missouri as well as the Missouri Department of Corrections to develop a comprehensive justice reinvestment plan for the state. Under current population trends, the DOC will be more than 2,300 prison beds short of needed capacity by the end of FY21, necessitating the construction of two new prisons. Justice Reinvestment will help to curtail some prison population growth by diverting offenders to community treatment and potentially avoid expenditures of over \$400 million.

The funding for the implementation plan consists mainly of new decision items for community-based behavioral health treatment for a period of five years. The DOC assumes that funding is maintained moving forward and that other elements of the Justice Reinvestment option package are implemented.

The bill also includes other JRI strategies such as:

- adopting a validated assessment instrument to identify and target high risk/high need offenders to ensure resources are used most efficiently;
- providing additional case management services for offenders; and
- implementing improved Probation and Parole Officer strategies to more effectively supervise offenders in the community and prevent recidivism

The JRI strategies in this bill and the ongoing investment in additional community-based behavioral treatment services over five years results in a projected diversion of over 3,000 offenders from prison to more effective community supervision.

ASSUMPTION (continued)

On page 7 of the fiscal note, DOC provides a timeline of funding, implementation, and cost avoidance that will occur if this legislation is approved.

Year One of the implementation plan will include the cost of a \$5 million new decision item for community-based behavioral health treatment which includes substance use disorder treatment (SUDS) and mental health treatment. There are reductions in the number of treatment beds at Chillicothe Correctional Center (56 120-day beds) and contracted SUDS at Western Reception and Diagnostic Correctional Center (325 beds) for a core reduction of \$1,042,617. There is also cost avoidance of \$502,686 from having 81 fewer offenders in prison due to additional community-based behavioral treatment services available in the community and other JRI initiatives.

Year Two of the implementation plan includes a cost avoidance of \$2,401,722 from 387 fewer offenders in prison due to ongoing community-based behavioral treatment services available in the community from the original \$5 million new decision item and other JRI initiatives. There is also a cost avoidance of \$7,527,828 from 1,213 fewer offenders in prison due to a new decision item for an additional \$10 million in community-based behavioral treatment services and other JRI initiatives. There is an ongoing cost avoidance of \$1,042,617 from the closing of prison treatment beds at CCC and WRDCC.

At Year Two the DOC would have had to begin construction of one additional male and one additional female prison (approximately \$350 million). By implementing this legislation, there is a cost avoidance as JRI diverts offenders to community treatment options, improves recidivism rates, and decreases prison population growth. Costs include the ongoing \$5 million community-based behavioral health treatment plus an additional \$10 million for expansion of community-based behavioral health treatment services in year two.

Year Three of the implementation plan includes the cost avoidance of \$3,127,824 from 504 fewer offenders in prison due to ongoing treatment services available in the community from the original \$5 million new decision item and other JRI initiatives.

There is a cost avoidance of \$9,507,592 from 1,532 fewer offenders in prison due to the \$10 million expansion of community-based behavioral health treatment services in year two plus the new decision item for an additional \$10 million in community-based behavioral treatment services and other JRI initiatives.

ASSUMPTION (continued)

At Year Three the DOC would have had to start hiring staff for the two new prisons for a half year. By not building the new prisons, this results in a cost avoidance of approximately \$27 million in operating costs.

Costs include the ongoing \$5 million community-based behavioral health treatment, the \$10 million expansion cost from a new decision item in year two, plus an additional \$10 million for additional community-based behavioral health treatment services in year three.

Year Four of the implementation plan includes a cost avoidance of \$3,907,368 from 628 fewer offenders in prison due to ongoing treatment services available in the community from the original \$5 million new decision item and other JRI initiatives.

There is a cost avoidance \$11,642,456 from 1,876 fewer offenders in prison due to the \$20 million expansion of community-based behavioral health treatment services in years two and three, plus a new decision item for an additional \$10 million for community-based behavioral health treatment services and other JRI initiatives.

At Year Four the DOC would have brought the new prisons online for a full year. By not building the new prisons, this results in a cost avoidance of approximately \$54 million in operating costs.

Costs include the ongoing \$5 million community-based behavioral health treatment, the \$20 million expansion cost from new decision items in years two and three, plus an additional \$10 million for additional community-based behavioral health treatment services in year four.

Year Five of the implementation plan is the end of the initial phase of the program. Year Five includes a cost avoidance of \$4,679,324 from 754 fewer offenders in prison due to ongoing treatment services available in the community from the original \$5 million new decision item in year one and other JRI initiatives.

There is a cost avoidance of \$14,503,422 from 2,337 fewer offenders in prison due to the \$30 million expansion of community-based behavioral treatment services in years two, three, and four, plus a new decision item for an additional \$5 million for community-based behavioral health treatment services and other JRI initiatives.

At Year Five the DOC continues to benefit from not building the new prisons, which results in a cost avoidance of approximately \$54 million annually in operating costs.

ASSUMPTION (continued)

Costs include the ongoing \$5 million community-based behavioral health treatment, the \$30 million expansion cost from new decision items in Years two, three, and four, plus an additional \$5 million to complete the initial phase of statewide expansion of community-based behavioral health treatment services in year five.

As the implementation of the plan develops over five years, there may be additional changes to treatment services provided in prison. However, it is difficult to determine any impact at this time. There may be additional offenders under community supervision; however, the DOC believes that any impact would be absorbable with current Probation & Parole staffing.

It is difficult to determine the exact fiscal impact of this legislation because Justice Reinvestment is a multi-phase, multi-year program. With the policy framework established in SB 966, additional funding in subsequent years has the potential to decrease prison population by numbers large enough to divert the need for new prisons. Eventually, the DOC may also be able to close an existing prison in the long term, which would save the state hundreds of millions of dollars. However, many factors determine the prison population including new legislation and sentencing requirements that could increase population despite the DOC's efforts to minimize growth.

COSTS:	FY '19	FY '20	FY '21	FY '22	FY '23
Year 1 - Investment in Community Treatment	(\$5,000,000)	(\$5,000,000)	(\$5,000,000)	(\$5,000,000)	(\$5,000,000)
Year 2 - Additional Investment		(\$10,000,000)	(\$10,000,000)	(\$10,000,000)	(\$10,000,000)
Year 3 - Additional Investment			(\$10,000,000)	(\$10,000,000)	(\$10,000,000)
Year 4 - Additional Investment				(\$10,000,000)	(\$10,000,000)
Year 5 - Additional Investment					(\$5,000,000)
Subtotal	(\$5,000,000)	(\$15,000,000)	(\$25,000,000)	(\$35,000,000)	(\$40,000,000)
COST AVOIDANCE:					
Year 1 core reduction in Substance Use & Recovery Services	\$1,042,617	\$1,042,617	\$1,042,617	\$1,042,617	\$1,042,617
Cost Avoidance for offenders diverted to Community Treatment from 1st year \$5 M	\$502,686 (for 81 offenders)	\$2,401,722 (for 387 offenders)	\$3,127,824 (for 504 offenders)	\$3,897,368 (for 628 offenders)	\$4,679,324 (for 754 offenders)
Cost Avoidance for offenders diverted to Community Treatment from year 2-5	\$0	\$7,527,878 (for 1,213 offenders)	\$9,507,592 (for 1,532 offenders)	\$11,642,456 (for 1,876 offenders)	\$14,503,422 (for 2,337 offenders)
Cost Avoidance for 2 new prisons	\$0	\$347,197,272	\$0	\$0	\$0
Cost Avoidance for operation of 2 new prisons	\$0	\$0	\$26,837,107 (½ year)	\$53,674,214	\$53,674,214
Subtotal of cost avoidance	\$1,545,303	\$358,169,489	\$40,515,140	\$70,256,655	\$73,899,577
Estimated net effect:	(\$3,454,697)	\$343,169,489	\$15,515,140	\$35,256,655	\$33,899,577

For fiscal note purposes, **Oversight** will utilize DOC's estimates. However, Oversight will assume the cost avoidance for two new prisons, would be the cost avoidance of servicing debt of an amount estimated by DOC (\$347.2 million) over 25 years at an annual rate of 4.0%, or approximately \$22.2 million per year that the state will not be required to pay if this proposal prevents the state from requiring 2 additional prisons.

ASSUMPTION (continued)

Officials from the **Department of Public Safety - Missouri Highway Patrol (MHP)** state:

595.220.3(1) - The total number of sexual assault kits we received in 2017 was 617. According to UCR, 1,587 were reported (non-KC or STL). The Highway Patrol Crime Laboratory only received approximately 39% of what was reported. The Crime Lab estimates that this law would create a 61% increase in sexual assault kit submissions. Consequently, the Crime Lab would need to increase its capacity by 61%.

PS (Salary without fringe benefits):

6 FTE Criminalist III @ \$58,896 = \$353,376

3 FTE Forensic Lab Technician III @ \$34,416 = \$103,248

E&E: (Laboratory supplies @ \$20,000 each criminalist
and \$10,000 for each technician) = \$150,000
(GR - ongoing)

TOTAL COST (GR funds - ongoing) \$606,624

Criminalist III's analyze DNA evidence and Forensic Evidence Technicians support Criminalists by making reagents, ordering consumables, maintaining instruments and running robotics.

Not factoring in labor, the materials cost of analysis of a Sexual assault kit is roughly \$200 per kit. We estimate a potential increase of 970 sexual assault kits to be submitted to the Crime Laboratory. Which would require a budget increase of \$194,000 (\$200 x 970) annually.

Officials from the **Department of Mental Health (DMH)** state regarding Section 217.021, DMH would be responsible for collaborating with DOC to establish a referral and evaluation process, eligibility criteria and discharge process for community behavioral health programs. DMH would be responsible for oversight of program case management services, provide performance and outcome metrics, and supervise and monitor referral caseloads. DMH would need to hire a Program Specialist II to take on these duties; this would be a cost to DMH of \$70,176 for FY2019, \$71,001 for FY2020 and \$71,593 for FY 2021. DMH will partner with DOC to contract with behavioral health providers. DMH assumes that these services will be funded entirely with the \$5 million dollars for justice reinvestment, currently in the FY 2019 DOC Governor's recommended budget. If this funding is increased in future years, DMH may require additional FTE. 3(3)(a) says DMH will accept "all eligible referrals" and "continue services on an ongoing basis until established discharge criteria are met". DMH assumes that eligibility and continuation of services is dependent on the availability of DOC funding. 3(3)(b) says DMH behavioral health providers will "accept reimbursement on a per-month, per-referral

ASSUMPTION (continued)

basis." The DMH current billing system is a fee for service (FFS) reimbursement process, so an alternative payment process would need to be established that may require IT work.

Based upon DOC's assumption that the investment in community treatment would grow from \$5 million in FY 2019 to \$40 million in FY 2023, **Oversight** will reflect "More than" DMH's estimate for the need for 1 FTE past FY 2019.

Officials from the **Office of the State Auditor (SAO)** state Section 650.035 requires the State Auditor to periodically audit law enforcement agencies receiving state funds under the new program. Because an unknown number of agencies may participate, and it is unclear how extensive the funding received would be, the fiscal impact to the SAO is unknown.

Officials from the **Attorney General's Office (AGO)** assume that any potential costs arising from this proposal could be absorbed with existing resources. The AGO may seek additional appropriations if there is a significant increase in litigation.

Officials from the **Department of Public Safety - Office of the Director**, the **Office of Administration (Facilities Management, Design and Construction, and Information Technology Services Division)**, the **Department of Health and Senior Services**, the **Joplin Police Department**, and the **Springfield Police Department** each assume the proposal would not fiscally impact their respective agencies.

Officials from the **Office of the State Courts Administrator** state there may be some impact, but there is no way to quantify that currently. Any significant changes will be reflected in future budget requests.

Oversight assumes the various changes to Chapter 595 would allow additional claims to be made on the Crime Victims' Compensation Fund. Oversight has no basis to estimate the amount, so we will assume an unknown loss to the fund for additional claims.

Oversight assumes Section 650.035 allows the Department of Public Safety to provide financial and technical assistance to local law enforcement agencies. Oversight will assume an unknown amount of financial assistance from the state to locals.

FISCAL IMPACT -
State Government

	FY 2019 (10 Mo.)	FY 2020	FY 2021	Fully Implemented (FY 2023)
GENERAL REVENUE				
<u>Costs - MHP</u>				
Personal Service (9 FTE)	(\$380,520)	(\$461,190)	(\$465,802)	(\$475,164)
Fringe Benefits	(\$340,413)	(\$412,581)	(\$416,706)	(\$425,081)
Lab Supplies (Criminalist)	(\$120,000)	(\$120,000)	(\$120,000)	(\$120,000)
Lab Supplies (Technicians)	(\$30,000)	(\$30,000)	(\$30,000)	(\$30,000)
Sexual Assault Kits	<u>(\$194,000)</u>	<u>(\$194,000)</u>	<u>(\$194,000)</u>	<u>(\$194,000)</u>
<u>Total Costs - MHP</u>	<u>(\$1,064,933)</u>	<u>(\$1,217,771)</u>	<u>(\$1,226,508)</u>	<u>(\$1,244,245)</u>
FTE Change - MHP	9 FTE	9 FTE	9 FTE	9 FTE
<u>Costs - DMH</u>		More than...	More than....	More than...
Personal Service	(\$45,192)	(\$45,644)	(\$46,100)	(\$47,027)
Fringe Benefits	(\$13,422)	(\$24,344)	(\$24,480)	(\$24,972)
E & E	<u>(\$11,553)</u>	<u>(\$1,013)</u>	<u>(\$1,013)</u>	<u>(\$1,013)</u>
<u>Total Costs - DMH</u>	<u>(\$70,167)</u>	More than (\$71,001)	More than (\$71,593)	More than (\$73,012)
FTE Change - DMH	1 FTE	More than 1 FTE	More than 1 FTE	More than 1 FTE
<u>Costs - DOC - investment in Community Treatment</u>	<u>(\$5,000,000)</u>	<u>(\$15,000,000)</u>	<u>(\$25,000,000)</u>	<u>(\$40,000,000)</u>
<u>Cost Avoidance - DOC - in substance use & recovery services</u>	<u>\$1,042,617</u>	<u>\$1,042,617</u>	<u>\$1,042,617</u>	<u>\$1,042,617</u>

<u>FISCAL IMPACT -</u> <u>State Government</u> (continued)	FY 2019 (10 Mo.)	FY 2020	FY 2021	Fully Implemented (FY 2023)
GENERAL REVENUE (continued)				
<u>Cost Avoidance -</u> DOC - Community Treatment (orig \$5 M)	\$502,686	\$2,401,722	\$3,127,824	\$4,679,324
<u>Cost Avoidance -</u> DOC - Community Treatment (add'l investments)	\$0	\$7,527,878	\$9,507,592	\$14,503,422
<u>Cost Avoidance -</u> DOC - debt amortization for 2 new prisons		\$22,200,000	\$22,200,000	\$22,200,000
<u>Cost Avoidance -</u> DOC - of operations of 2 new prisons	\$0	\$0	\$26,837,107	\$53,674,214
<u>Cost - DPS & SAO</u> §650.035 - Missouri Law Enforcement Assistance Program	<u>(Unknown)</u>	<u>(Unknown)</u>	<u>(Unknown)</u>	<u>(Unknown)</u>
ESTIMATED NET EFFECT TO THE GENERAL REVENUE FUND	<u>(Could exceed</u> <u>\$4,589,797)</u>	<u>Less than</u> <u>\$16,883,445</u>	<u>Less than</u> <u>\$36,417,039</u>	<u>Less than</u> <u>\$54,782,620</u>
Estimated Net FTE Change for GR*	10 FTE	More than 10 FTE	More than 10 FTE	More than 10 FTE

*Does not take into account avoided additional FTE for the Department of Corrections

FISCAL IMPACT -
State Government
 (continued)

FY 2019
 (10 Mo.)

FY 2020

FY 2021

Fully
 Implemented
 (FY 2023)

**CRIME VICTIMS
 COMPENSATION
 FUND**

Cost - DPS -
 assumed additional
 claims from changes
 to Chapter 595

(Unknown)

(Unknown)

(Unknown)

(Unknown)

**ESTIMATED NET
 EFFECT TO THE
 CRIME VICTIMS
 COMPENSATION
 FUND**

(Unknown)

(Unknown)

(Unknown)

(Unknown)

FISCAL IMPACT -
Local Government

FY 2019
 (10 Mo.)

FY 2020

FY 2021

Fully
 Implemented
 (FY 2023)

**LOCAL LAW
 ENFORCEMENT**

Income - from DPS
 for Missouri Law
 Enforcement
 Assistance Program

Unknown

Unknown

Unknown

Unknown

**ESTIMATED NET
 EFFECT TO
 LOCAL LAW
 ENFORCEMENT**

Unknown

Unknown

Unknown

Unknown

FISCAL IMPACT - Small Business

No direct fiscal impact to small businesses would be expected as a result of this proposal.

FISCAL DESCRIPTION

This act modifies provisions relating to the administration of the criminal justice system.

PROBATION AND PAROLE BOARD

This act renames the Missouri Board of Probation and Parole as the Parole Board. The Board shall exercise independence in its decision making but operate cooperatively within the department of corrections and with other agencies, officials, courts, and stakeholders to achieve systemic improvement. Under this act, the board shall adopt guidelines pertaining to: finite prison capacity for violent offenders, releasing supervision manageable cases, use of finite resources, supporting seamless reentry, setting appropriate conditions of supervision, and developing strategies for responding to violations. In addition, the act requires the Board to collect and publish data on parolees.

This act creates "the Division of Probation and Parole" as a new division within the Department of Corrections.

Under this act, the Division of Probation and Parole will give administrative support to the Parole Board as well as assume supervision over all offenders subject to probation, parole, and supervision, and provide programs necessary to carry out its responsibilities. Additionally, the director of the Division will assume the role of appointing probation and parole officers in lieu of the chairman of the Parole Board, and issue warrants for the arrest of persons under the supervision of the Division.

This act requires the Department of Corrections to establish a "community behavioral health program". Under the program, the Department will collaborate with the Department of Mental Health to provide comprehensive community-based services for individuals under the supervision of the Department of Corrections who have serious behavioral health conditions.

The Department of Corrections must adopt a streamlined, validated risk/need assessment tool in order to evaluate the risk/need of offenders as it pertains to department programs. In addition, the act modifies the parole review standards and instructs the Parole Board to conduct a risk/need assessment prior to an offender's hearing, and allows the Board to waive the hearing if the assessment indicates the offender may be paroled without an interview. Also, special parole conditions shall be responsive to the assessed risk and needs of the offender.

FISCAL DESCRIPTION (continued)

This act allows for a victim who has requested an opportunity to be heard by the Parole Board to receive notice that the Board is conducting a risk assessment of the inmate.

This act repeals a provision requiring an offender seeking parole to have achieved, or have made an honest good-faith effort to achieve, a high school diploma or its equivalent.

This act authorizes community supervision centers to respond to violations and prevent revocations.

EARNED COMPLIANCE CREDIT

This act gives the Division of Probation and Parole oversight over the awarding and supervision of earned compliance credits. The Division may rescind earned credits if the offender is found ineligible for credits because of a violation which indicates a longer term of probation, parole or conditional release is necessary. Additionally, this act requires offenders to complete restitution prior to final discharge by the Division.

VICTIM COMPENSATION AND SAFE KITS

Currently, if a victim of a crime submits a claim for compensation and the claim is rejected for lack of substantial proof, the victim has thirty days to amend their claim before the claim will be dismissed with prejudice. Additionally, no victim of a crime may recover if the victim has been found guilty of two felonies within the last ten years if one or both involved illegal drugs or violence. This act repeals those provisions.

Currently, if a victim of a crime is from outside of Missouri, the victim is not eligible for compensation unless federal funds for compensation exist. This act repeals that provision.

Currently, compensation for medical services may not exceed \$2,500 and compensation for out-of-pocket loss as a result of property seized by a law enforcement investigation may not exceed \$250. This act repeals that provision. Additionally, this act modifies the scope of "personal injury" to include emotional or mental harm.

Currently, no case may be awarded compensation if police records show a report was not issued within forty-eight hours. This act repeals that provision and allows victims of domestic violence, sexual offenses, and stalking to provide sworn statements in lieu of official records.

Currently, the Department of Public Safety is not liable to make payments of compensation for any out-of-pocket expenses incurred more than three years following the date of the occurrence

FISCAL DESCRIPTION (continued)

of the crime. This act repeals that provision.

This act modifies the requirements of law enforcement agencies as it pertains to the acquisition and storage of forensic examination evidence.

JAIL PAYMENTS

This act authorizes the presiding judge of a judicial circuit to propose expenses reimbursable by the state on behalf of one or more of the counties in that circuit.

LAW ENFORCEMENT

This act eliminates the "Missouri Crime Prevention Information Center" and replaces it with the "Missouri Law Enforcement Assistance Program" which has the purpose of providing state financial and technical assistance to programs including reimbursement for overtime, increasing analytical capacity, and community policing.

RECORDS

This act repeals a provision requiring the deletion of uniquely identifying medical information within a criminal record prior to its being made available to qualified persons and organizations.

This act authorizes automation of Department of Corrections records and makes some records available to law enforcement agencies and qualified persons and organizations as defined by the Health Insurance Portability and Accountability Act..

This legislation is not federally mandated, would not duplicate any other program and would not require additional capital improvements or rental space.

SOURCES OF INFORMATION

Department of Corrections
Department of Public Safety
Department of Public Safety - Missouri Highway Patrol
Department of Mental Health
Office of the State Courts Administrator
Department of Health and Senior Services
Office of the Attorney General
Office of the State Auditor

Ross Strobe

A handwritten signature in black ink, appearing to read "Ross Strobe", with a stylized flourish at the end.

Acting Director
February 26, 2018