

STATE OF RHODE ISLAND

DEPARTMENT OF CHILDREN, YOUTH AND FAMILIES

Department Response to Public Comment regarding the proposed amendment to 214-RICR-60-00-1, Rules and Regulations of the Rhode Island Training School

I. Summary of Public Participation

A. Individuals Providing Oral Testimony

- 1) Joseph DeLuca – Opposed
- 2) Kelsey Rice – In Support
- 3) Stephen Shears – Opposed
- 4) Antonio Goncalves – Opposed
- 5) Matthew Gunnip – Opposed
- 6) Angela Bannerman Ankoma – In Support

B. Individuals Submitting Written Public Comments

- 1) Lloyd Bullard – In Support
- 2) Akilah Keita – In Support
- 3) Claudette Bannerman – In Support
- 4) Elise Wills – In Support
- 5) Shannon Massarocco – In Support
- 6) Kelsey Bala (Rhode Island KIDS COUNT) – In Support
- 7) Simona Simpson-Thomas – In Support
- 8) Jon Morel – Opposed
- 9) De'Nara Polk – Opposed
- 10) Pride Clark – Opposed
- 11) Nicole Barnard – Opposed
- 12) Regine Reaves – In Support
- 13) Beth Jordan – Opposed
- 14) Dennis Lassiter – Opposed
- 15) Kelsey Rice – In Support
- 16) Stephen Cooper – Opposed
- 17) Stephen Shears – Opposed
- 18) Richard Ferruccio – Opposed
- 19) Joseph DeLuca – Opposed

Written responses to all comments are provided in the sections below.

II. Department Responses to Public Comment- Oral Testimony

1) Response to Joseph DeLuca

The Department appreciates Mr. DeLuca's testimony and his long-standing service at the Rhode Island Training School. Mr. DeLuca raised concerns

regarding recruitment, retention, staff morale, public safety, statutory alignment, and the procedural process associated with the proposed amendment.

The Department respectfully clarifies that the proposed amendment is limited to updating the division title from “Division of Juvenile Correctional Services” to “Division of Youth Development.” As stated at the public hearing, this change is administrative in nature and does not alter the statutory authority, operational structure, security procedures, staffing requirements, training academy standards, or care, custody, and control responsibilities of staff at the Training School.

The Department recognizes and values the key role of Juvenile Program Workers and Shift Coordinators in preserving safety and security. The amendment does not diminish the correctional, custodial, or public safety functions performed by staff. Those responsibilities remain unchanged.

With respect to recruitment and retention, the Department will continue to clearly communicate job expectations, physical requirements, and the secure nature of the facility in all recruitment materials and hiring processes.

Regarding procedural concerns, the Department is conducting this rulemaking in accordance with the Rhode Island Administrative Procedures Act.

The Department carefully considered Mr. DeLuca’s comments but has determined that the proposed title change is consistent with the Department’s mission and does not substantively change operations.

2) Response to Kelsey Rice

The Department thanks Ms. Rice for her thoughtful testimony and for sharing her professional and direct experiences working with system-involved youth.

Ms. Rice spoke to the importance of language, identity, and the impact of labeling on young people. The Department acknowledges these perspectives and agrees that language can shape perception and identity.

The purpose of the proposed amendment is to align the division title with the Department’s rehabilitative and developmental mission, while continuing accountability and public safety. The change does not alter the facility’s secure nature or the Department’s statutory responsibilities, but it reflects an emphasis on rehabilitation and youth development within that secure framework.

The Department appreciates Ms. Rice’s support of the proposed amendment.

3) Response to Stephen Shears

The Department appreciates Mr. Shears' decades of service and his detailed testimony regarding recruitment, training standards, law enforcement requirements, and staff identity.

Mr. Shears expressed concern that the proposed title change could damage staff identity, morale, and recruitment efforts, and that the term "correctional" accurately reflects the facility's secure nature.

The Department respectfully reiterates that the proposed amendment does not alter the Training School's operational, training, or security requirements. The eight-week academy, physical agility standards, psychological evaluations, law enforcement coordination, and care, custody, and control functions remain unchanged.

The title change does not affect collective bargaining agreements, special purpose agreements, or contractual instruments. Any contractual matters remain governed by applicable labor agreements and processes independent of this regulatory amendment.

The Department acknowledges staff pride in their professional identity and affirms that the facility's correctional and security functions remain intact.

After review of Mr. Shears' comments, the Department has determined that the administrative update to the division title does not weaken public safety responsibilities or operational authority.

4) Response to Antonio Goncalves

The Department thanks Mr. Goncalves for his testimony and his perspective as a shift coordinator and union representative.

Mr. Goncalves raised concerns that the proposed title change may create confusion among applicants and suggested that programmatic improvements and expanded vocational opportunities would better support youth outcomes.

The Department agrees that high-quality programming, workforce development opportunities, and skill-building initiatives form essential components of successful rehabilitation. The proposed amendment does not replace or preclude attempts to improve programming within the Training School.

The Department will continue to ensure that recruitment materials clearly describe the secure and physically demanding nature of frontline roles.

The proposed amendment is limited to updating terminology and does not alter programmatic direction or prevent the creation of additional services.

5) Response to Matthew Gunnip

The Department appreciates Mr. Gunnip's testimony and his expanded concerns regarding workforce engagement, transparency, and labor relations.

Mr. Gunnip expressed concerns about recruitment clarity, retention challenges, and whether the Administrative Procedures Act was followed in the process.

The Department confirms that the current rulemaking process is being conducted in accordance with the Administrative Procedures Act, including public notice, opportunity for comment, and formal filing with the Secretary of State.

The proposed amendment does not alter working conditions, job classifications, or contractual obligations. It updates the terminology in the regulation to reflect the Department's current organizational framework and mission alignment.

The Department values engagement with frontline staff and will continue to seek input through appropriate operational and labor-management channels separate from the regulatory amendment process.

6) Response to Angela Bannerman Ankoma

The Department thanks Ms. Bannerman Ankoma for her testimony and her support of the proposed amendment.

Ms. Bannerman Ankoma pointed out the importance of development-oriented language, equity considerations, adolescent brain development research, and national trends in juvenile justice reform.

The Department agrees that youth development and rehabilitation are central to its mission and that language can reflect institutional values. The proposed amendment aligns the regulatory terminology with the Department's rehabilitative framework while maintaining accountability and public safety obligations.

The Department appreciates Ms. Bannerman Ankoma's support.

III. Department Responses to Public Comment- Written Comments

1) Response to Lloyd Bullard (Received February 12, 2026)

The Department appreciates Mr. Bullard's comments and his support for aligning the division title with a youth development-centered purpose. The Department agrees that language can reflect and reinforce mission, accountability, and expectations regarding outcomes for youth in the State's care.

The proposed amendment updates the division title referenced throughout the regulation from "Division of Juvenile Correctional Services" to "Division of Youth Development." This change is administrative in nature and does not alter the Training School's statutory responsibilities, secure operations, staffing requirements, or public safety obligations. The Department appreciates the

perspective that a development-centered title can support a modern, developmentally appropriate approach to youth services and help communicate the rehabilitative intent of the system.

The Department thanks Mr. Bullard for his input and support.

2) Response to Akilah Keita (Received February 13, 2026)

The Department thanks Ms. Keita for her comments and support of the proposed amendment. Ms. Keita notes that the proposed title is consistent with the purpose statement in the Training School regulation regarding treatment, rehabilitation, and care in the least restrictive environment, and references research supporting the use of developmentally appropriate approaches for adolescents.

The Department acknowledges these points and agrees that youth development principles are consistent with the Training School's rehabilitative mission. The proposed amendment updates terminology within the regulation to reflect that mission alignment and does not change the secure nature of the facility or the Department's statutory authority and responsibilities.

The Department appreciates Ms. Keita's support, and the reference materials provided.

3) Response to Claudette Bannerman (Received February 18, 2026)

The Department appreciates Ms. Bannerman's thoughtful comments and her perspective as a Rhode Island resident, parent, and licensed clinical social worker. The Department acknowledges the concerns expressed regarding the effects of language on youth identity, family trust, equity, and the wider message it conveys about the purpose of the Training School.

For clarity, the proposed amendment updates the division title referenced throughout the regulation from "Division of Juvenile Correctional Services" to "Division of Youth Development."

The Department agrees that terminology can influence perception and that systems serving youth should reflect principles of rehabilitation, accountability, growth, and dignity. The proposed amendment does not alter the Training School's secure nature, its statutory mandate, or its public safety responsibilities.

The Department appreciates Ms. Bannerman's emphasis on ensuring that youth are not defined by their worst moments and that systems communicate a belief in young people's capacity to grow and change.

4) Response to Elise Wills (Received February 18, 2026)

The Department appreciates Ms. Wills' detailed comments and her emphasis on the importance of language and the impact of terminology on youth, system values, stigma, and equity. The Department understands and acknowledges the view that "Youth Development" communicates a rehabilitative, education- and progress-oriented approach.

The Department notes, for clarity, that the proposed amendment updates the regulation's division title to "Division of Youth Development" and does not propose a return to "Juvenile Corrections" terminology. The Department agrees that the language used in public systems should reflect dignity and a developmentally appropriate approach while maintaining accountability and public safety.

The Department thanks Ms. Wills for her engagement and comments.

5) Response to Shannon Massarocco (Received February 18, 2026)

The Department appreciates Ms. Massarocco's detailed comments and her emphasis on the importance of language and the impact of words on youth, culture, expectations, and how youth see themselves. The Department understands and acknowledges the view that "Youth Development" communicates that youth are still growing, learning, and able to respond to structure and accountability.

The Department notes, for clarity, that the proposed amendment updates the regulation's division title to "Division of Youth Development" and does not propose a return to "Juvenile Corrections" terminology. The Department agrees that the language used in public systems should reflect dignity and a developmentally appropriate approach while maintaining accountability and public safety.

The Department thanks Ms. Massarocco for her engagement and comments.

6) Response to Rhode Island KIDS COUNT, submitted by Kelsey Bala (Received February 19, 2026)

The Department thanks Rhode Island KIDS COUNT and Ms. Bala for the thoughtful comments and strong support for the proposed amendment. The Department acknowledges KIDS COUNT's point that language holds weight, can either stigmatize or humanize, and can influence perception and practice.

The proposed amendment updates the division title referenced throughout the regulation from "Division of Juvenile Correctional Services" to "Division of Youth Development" to more closely align terminology with the Department's mission framework. The Department appreciates KIDS COUNT's perspective on broader trends in modernizing youth justice language and its emphasis on dignity and equity.

The Department thanks Rhode Island KIDS COUNT for its ongoing partnership and comments.

7) Response to Simona Simpson-Thomas (Received February 24, 2026)

The Department appreciates Ms. Simpson-Thomas's comments and her professional perspective as a superintendent working with youth affected by trauma and systematic inequities. The Department acknowledges the comment that language shapes expectations and can influence policy and practice.

The Department clarifies that the proposed amendment updates the division title to "Division of Youth Development." This change does not alter the Training School's secure operations, statutory responsibilities, or public safety obligations. The Department agrees that education, rehabilitation, and development are central goals for youth served in secure settings, and that terminology can reflect these goals.

The Department thanks Ms. Simpson-Thomas for her engagement and comments.

8) Response to Jon Morel (Received February 26, 2026)

The Department appreciates Mr. Morel's comments and his perspective as a Juvenile Program Worker and union member. Mr. Morel expresses concern about recruitment and retention, applicant expectations, staff identity, safety and security, and process-related issues.

The Department clarifies that the proposed amendment updates the division title referenced throughout the regulation to "Division of Youth Development." This administrative update does not change the Training School's secure nature, required safety and security procedures, staff roles and responsibilities, hiring standards, training requirements, or statutory authority. The Department recognizes the importance of recruiting candidates who understand the demands of working in a secure facility and will continue to ensure that job postings and recruitment materials clearly describe the secure setting and expectations.

With respect to the legal and labor process concerns raised, the Department acknowledges the comment. This rulemaking is being conducted through the formal public process required under the Administrative Procedures Act, including notice and public comment, to preserve transparency and compliance for changes to regulatory language.

The Department thanks Mr. Morel for his comments.

9) Response to De'Nara Polk (Received February 26, 2026)

The Department appreciates Ms. Polk's comments and her perspective as a recent academy graduate and Juvenile Program Worker. Ms. Polk articulates

concerns regarding applicant expectations and the accuracy of job descriptions relative to the full scope of frontline responsibilities in a secure facility.

The Department agrees that recruitment and hiring materials must accurately reflect the nature of the work, including safety and security responsibilities, and will continue to review job postings and descriptions to guarantee clarity for applicants.

The proposed amendment updates the division title referenced in the regulation to “Division of Youth Development” and does not change the duties, authority, or responsibilities of staff, including care, custody, and control functions. The Department appreciates the emphasis regarding clarity in recruitment and training and will consider these comments as part of ongoing operational improvement.

10) Response to Pride Clark (Received February 26, 2026)

The Department appreciates Mr. Clark’s comments and his perspective as a Juvenile Program Worker. Mr. Clark stresses the Training School’s secure nature, the seriousness of the population served, and concerns that terminology could distort facility operations and compromise safety.

The Department reiterates that the proposed amendment updates the division title referenced in the regulation to “Division of Youth Development” and does not change the Training School’s secure operations, public safety mission, or staff responsibilities. The Department recognizes the significance of clear public understanding of the facility’s purpose and security requirements and will continue to ensure that external-facing communications, recruitment, and interagency coordination accurately describe the facility and its function.

The Department thanks Mr. Clark for his comments.

11) Response to Nicole Barnard (Received February 26, 2026)

The Department appreciates Ms. Barnard’s detailed comments and her perspective regarding recruitment clarity, facility operations, safety and security, potential costs, and procedural concerns.

The Department reiterates that the proposed amendment updates the division title referenced throughout the regulation to “Division of Youth Development.” This update does not change the Training School’s secure nature, job duties, required training, or safety and security procedures. The Department agrees that clarity for applicants is essential and will continue to ensure that recruitment materials and job postings clearly describe the secure setting and expectations, including when physical intervention may be required to maintain safety.

Ms. Barnard also notes potential costs associated with updating uniforms and recruitment materials. The Department acknowledges the comment and will consider implementation logistics as part of administrative planning.

Regarding procedural concerns, the Department is advancing this amendment through formal rulemaking pursuant to the Administrative Procedures Act, which includes public notice and an opportunity for comment.

The Department thanks Ms. Barnard for her engagement and comments.

12) Response to Regine Reaves (Received March 1, 2026)

The Department thanks Dr. Reaves for her comments and professional perspective regarding the effect of language on stigma, bias, and youth identity. The Department acknowledges the view that development-centered terminology can reinforce dignity and align systems with best practices for adolescent development.

The proposed amendment updates the division title referenced throughout the regulation to “Division of Youth Development” and does not alter the Training School's secure operations or its public safety responsibilities. The Department appreciates the emphasis on maintaining an approach grounded in rehabilitation and development, and on encouraging environments for youth in State care.

The Department thanks Dr. Reaves for her comments and support.

13) Response to Beth Jordan (Received March 2, 2026)

The Department appreciates Ms. Jordan's comments and her long-standing service, professional credentials, and operational perspective regarding recruiting, interviewing, training, and day-to-day facility responsibilities. Ms. Jordan raises concerns that “Youth Development” may contribute to applicant misunderstandings about the facility's security and the requirements of frontline roles, and notes challenges related to candidate fit and academy performance.

The Department agrees that recruitment and hiring processes must clearly communicate the secure setting, expectations, and qualifications required for positions at the Training School. The Department will continue to review job postings, descriptions, and recruitment materials to guarantee clarity for prospective applicants.

The proposed amendment updates the division title referenced in the regulation to “Division of Youth Development” and does not change the facility's secure status, staffing responsibilities, hiring standards, training requirements, or safety procedures. The Department acknowledges the operational concerns raised and will consider them as part of ongoing efforts to strengthen recruitment, screening, and training to ensure candidates are well-matched to the role.

The Department thanks Ms. Jordan for her comments.

14) Response to Dennis Lassiter (Received March 2, 2026)

The Department appreciates Mr. Lassiter's comments and his perspective as a Shift Coordinator and former Juvenile Program Worker. Mr. Lassiter raises concerns about recruitment impacts, staff identity, operational understanding, public safety messaging, and whether the title change is cosmetic.

The Department reiterates that the proposed amendment updates the division title referenced in the regulation to "Division of Youth Development." This change does not alter the Training School's statutory mandate, secure operations, staffing responsibilities, or safety and security practices.

Mr. Lassiter also presents broader system considerations about outcomes and the role of safe placement. The Department acknowledges these concerns and agrees that terminology alone does not replace the requirement for effective programming and evidence-based practices. The Department's intent is to align regulatory language with a rehabilitative, developmentally appropriate framework while continuing to maintain accountability and public safety obligations.

The Department thanks Mr. Lassiter for his comments.

15) Response to Kelsey Rice (Written Comment Received March 4, 2026)

The Department appreciates Ms. Rice's written comments and her perspective as President of the Juvenile Law Society at Roger Williams University School of Law. Ms. Rice discusses how language and labeling can shape youth identity, expectations, and perceptions of the juvenile justice system.

The Department acknowledges the perspective offered regarding the possible impact of terminology on how young people view themselves and their future opportunities. The Department agrees that language can influence perception and that systems serving youth should promote rehabilitation, growth, and development while continuing accountability and public safety.

The proposed amendment updates the division title referenced throughout the regulation from "Division of Juvenile Correctional Services" to "Division of Youth Development." The amendment is administrative and terminological and does not alter the Training School's statutory mandate, the secure nature of the facility, or the responsibilities of staff responsible for maintaining safety and order within the facility.

The Department appreciates Ms. Rice's emphasis on recognizing young people's potential and fortitude and acknowledges the broader discussion of language and its relationship to youth development and rehabilitation.

16) Response to Stephen Cooper (Received March 5, 2026)

The Department appreciates Mr. Cooper's comments and his perspective as a Shift Coordinator at the Rhode Island Training School, as well as his prior experience working with young people involved in DCYF services. Mr. Cooper discusses the day-to-day realities of the Training School, the facility's secure nature, and the role frontline staff play in sustaining safety, structure, and accountability as the youth receive rehabilitative services.

The Department acknowledges the important role of Juvenile Program Workers, Shift Coordinators, and other professionals who work directly with youth at the Training School. The Department recognizes that these positions involve major responsibilities, including upholding a secure environment and supporting youth through programming, treatment, and services intended to promote positive outcomes.

The proposed amendment updates the division title referenced throughout the regulation from "Division of Juvenile Correctional Services" to "Division of Youth Development." This amendment does not alter the Training School's statutory mandate, the secure nature of the facility, staffing responsibilities, training requirements, or the authority of staff responsible for care, custody, and control of youth.

Mr. Cooper's comment discusses the relevance of professional identity and the perception of terminology associated with correctional environments. The Department acknowledges these opinions and recognizes that staff take pride in the important work performed at the Training School. The proposed amendment does not change the facility's operational structure or staff responsibilities; instead, it updates regulatory terminology to conform to the Department's broader rehabilitative and developmentally informed mission framework.

The Department appreciates Mr. Cooper's comments and his service to the State.

17) Response to Stephen Shears (Written Comment Received March 5, 2026)

The Department appreciates Mr. Shears' written comments and his perspective as a long-serving employee and Shift Coordinator at the Rhode Island Training School. Mr. Shears discusses the facility's functional realities, the role of frontline staff responsible for care, custody, and control of youth, and concerns regarding recruitment, staff morale, and the possible implications of the proposed title change.

The Department recognizes the important role that Juvenile Program Workers, Shift Coordinators, and other staff play in maintaining a safe and secure environment within the Training School. The Department acknowledges the extensive training, hiring standards, and operational responsibilities associated with these roles, including academy training, physical agility requirements, and

other statutory or regulatory requirements applicable to staff working in secure facilities.

The proposed amendment updates the division title referenced throughout the regulation from “Division of Juvenile Correctional Services” to “Division of Youth Development.” This amendment does not alter the Training School’s statutory mandate, the secure nature of the facility, staffing responsibilities, hiring standards, training requirements, or the authority of staff to maintain protection and order through care, custody, and control responsibilities.

Mr. Shears’s comments raise concerns regarding recruitment, staff identity, and operational understanding. The Department agrees that recruitment materials, job postings, and training programs must clearly communicate the expectations and responsibilities associated with working in a secure facility. The Department will continue to ensure that recruitment and hiring processes accurately describe the operational environment and responsibilities of frontline positions.

The Department also acknowledges concerns regarding collective bargaining agreements and uniform standards. The proposed regulatory amendment does not alter collective bargaining agreements, classification specifications, or uniform requirements, which are governed through separate contractual and administrative processes.

The Department appreciates Mr. Shears’ many years of service and his detailed comments.

18) Response to Richard Ferruccio (Received March 5, 2026)

The Department appreciates Mr. Ferruccio’s comments and his perspective as President of the Rhode Island Brotherhood of Correctional Officers and a long-serving correctional professional in Rhode Island. Mr. Ferruccio expresses support for the concerns raised by staff at the Rhode Island Training School regarding the proposed amendment and discusses the importance of clarity in describing the facility’s secure nature and mission.

The Department acknowledges the important role of the professionals who work at the Training School and across the State’s correctional system. The Department recognizes that staff responsible for the care, custody, and control of youth perform challenging work that requires specialized training, clear operational expectations, and a strong commitment to safety and rehabilitation.

The proposed amendment updates the division title referenced throughout the regulation from “Division of Juvenile Correctional Services” to “Division of Youth Development.” This amendment is administrative and terminological in nature and does not alter the Training School’s statutory mandate, the secure nature of the facility, staffing responsibilities, training requirements, or safety and security

procedures. The amendment also does not change the operational authority of staff responsible for preserving order and safety within the facility.

Mr. Ferruccio's comment raises concerns about recruitment clarity and the risk of misunderstanding among applicants. The Department acknowledges the importance of ensuring that recruitment materials and job postings clearly communicate the Training School's secure, structured environment and the responsibilities associated with frontline roles. The Department will continue to ensure that recruitment communications and hiring processes accurately reflect the facility's operating realities.

The Department appreciates Mr. Ferruccio's comments and his support for the professionals who work at the Training School.

19) Response to Joseph DeLuca (Written Comment Received March 5, 2026)

The Department appreciates Mr. DeLuca's written comments and his perspective as President of Council 94 Local 314 and a Juvenile Program Worker at the Rhode Island Training School. Mr. DeLuca raises issues regarding staff recruitment and retention, the secure nature of the facility, employee morale, statutory alignment, and the procedural process associated with the proposed amendment. The comment also references a petition signed by staff members opposing the proposed rule change.

The Department acknowledges the important role of Juvenile Program Workers, Shift Coordinators, and other frontline staff in sustaining safety, structure, and security within the Training School. The Department recognizes that these positions require specialized training, including completion of the Pre-Service Training Academy and other hiring requirements.

The proposed amendment updates the division title referenced throughout the regulation from "Division of Juvenile Correctional Services" to "Division of Youth Development." This amendment is administrative and does not alter the Training School's statutory mandate, the secure nature of the facility, staffing responsibilities, hiring standards, training requirements, security procedures, or the care, custody, and control authority exercised by staff.

Mr. DeLuca's comments raise concerns that the changed terminology may create confusion about the facility's security or affect recruitment and retention. The Department agrees that recruitment materials and job descriptions must clearly communicate the expectations and safety responsibilities associated with working in a secure facility. The Department will continue to ensure that recruitment materials, job postings, and academy training accurately reflect the operations and requirements of frontline roles.

With respect to procedural concerns raised in the comment, the Department notes that the purpose of this rulemaking is to formally update the regulatory

language through the public process required under the Rhode Island Administrative Procedures Act, including public notice and the opportunity for comment.

The Department appreciates the comments submitted by Mr. DeLuca and the individuals who signed the attached petition.

20) Response to Louis Como (Received March 5, 2026)

The Department appreciates Mr. Como's comments and his perspective as a Shift Coordinator at the Rhode Island Training School and as a long-tenured Department employee. Mr. Como raises issues regarding recruitment, staff identity, facility security, and the possible impact of the proposed title change on applicants' understanding of the responsibilities associated with Juvenile Program Worker positions.

The Department recognizes the key role that Juvenile Program Workers, Shift Coordinators, and other frontline staff play in protecting safety, structure, and security inside the Training School. The Department acknowledges the importance of clearly communicating the expectations and responsibilities associated with these roles, including the physical agility requirements, training academy standards, and care, custody, and control responsibilities required to maintain a safe environment for youth and staff.

The proposed amendment updates the division title referenced throughout the regulation from "Division of Juvenile Correctional Services" to "Division of Youth Development." This amendment is administrative and terminological in nature and does not alter the Training School's statutory mandate, the secure nature of the facility, staffing responsibilities, hiring standards, training requirements, security procedures, or the authority of staff to maintain security and control.

Mr. Como's comments also raise concerns about recruitment and applicants' understanding of the role. The Department agrees that recruitment materials and job postings must clearly describe the functional realities and expectations of working in a secure facility. The Department will continue to ensure that recruitment communications, job descriptions, and academy training accurately reflect the responsibilities of frontline staff and the secure nature of the facility.

The Department appreciates Mr. Como's comments and his years of service to the State.

All comments have been included in the rulemaking record and carefully considered during the Department's review.