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July 19, 2006

David B. Farney, Asst. Counsel  
Department of Corrections  
Office of Chief Counsel  
55 Utley Drive  
Camp Hill, PA 17011

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INDEPENDENT REGULATORY  
REVIEW COMMISSION

Mr. Farney,

As Chairman of the Greene County Prison Board, I feel it has become necessary to make formal comment regarding the proposed rulemaking changes to Pa Title 37, Chapter 95 setting standards for county prisons in the Commonwealth of Pennsylvania.

The Department of Corrections position is that the changes will have no significant fiscal impact on the county prisons. As the governing authority for the Greene County Prison, the Prison Board feels the opposite of this to be true. The changes will necessitate the hiring of additional (minimum of 2-3) staff. Considerations beyond the base salary for creation of new positions is sick and vacation leave, benefits (averaging 30 percent of any salary), office space, space to meet with inmates to fulfill the minimum requirements, security concerns (possibly more security staff, additional cameras) and the addition of duties for current staff to comply with extra paperwork that will be necessary.

The County of Greene will be mandated by the state to finance all proposed changes without funding from the state. Realistically, the Greene County Prison could be looking at a budget increase of ten to fifteen percent on an annual basis. The additional treatment staff that would be necessary will need office and working space, of which there is already a shortage. The proposed standards would dictate that building expansion of some type be considered. The funding would, again, become the burden of the taxpayers of Greene County.

Therefore, the Prison Board requests that implementation of any proposed changes to Pa Title 37, be delayed pending meaningful input by the county

prisons and prison boards that will be adversely affected by the proposed changes.

Sincerely,

A handwritten signature in black ink, appearing to read "John Stets". The signature is written in a cursive style with some overlapping letters.

John Stets  
Chairman, Greene County Prison Board

