

Farney, David

From: Denny Ugoletti [DUgoletti@beavercountypa.gov]
Sent: Friday, July 21, 2006 9:48 AM
To: dfarney@state.pa.us
Subject: Proposed changes to 95.237 Religion

Mr. Farney,

I am responding to the proposals to change the minimum requirements of 95.237 applicable to religion. I am a contract employee serving as the official chaplain for the Beaver County Jail. I offer the following comments to the proposed changes:

(1) Written local policy must provide that inmates have access to religious activities. Participation in religious activities shall be a matter of choice on the part of each inmate. Religious activities shall be conducted in a location and manner that does not impinge upon the choice of an inmate not to participate.

The first sentence of paragraph one (1) is too broad and does not take inmate population into consideration. Does this mean that the facility must provide religious activities even if there is only one inmate of a particular faith?

(2) Individuals seeking to provide religious guidance to inmates shall be screened and selected by the prison administrator or designee. Screening and selection must include qualifications associated with clinical pastoral education or equivalent specialized training and endorsement by the appropriate religious certifying body.

Most county jails use local religious professionals to augment and support their religious programming. The educational and training criteria outlined above seems to be more than most churches and/or religious bodies require. The regulation as proposed will severely limit our pool of qualified volunteers. In addition, who determines what constitutes an "appropriate religious certifying body?" Finally, clinical pastoral education is predominantly associated with health care and very few county correctional chaplains have this type of training. Who will pay for it? And since Clinical Pastoral Education is very time intensive, how will those currently serving as county chaplains take time off to enroll in mostly resident health care CPE training? Please note that there is only one CPE training program at a correctional facility in the United States, the remainder are all at hospitals and/or hospices.

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