

Achieving More Effective Outcomes with Women in Jails: A Summit to Identify Strategies to Build and Expand Gender Responsive Approaches that Work

**October 16-17, 2014
Meeting Record**

This Summit was a joint effort of the National Resource Center on Justice Involved Women (NRCJIW) and the American Jail Association (AJA) to gain a greater understanding of the issues facing women in local jail facilities and develop strategies to increase the awareness of jail leadership and staff about gender responsive (GR) strategies that can improve their effectiveness when working with women and enhance facility safety and security for staff and inmates. Approximately 30 jail administrators, practitioners, community providers, researchers and criminal justice professionals with diverse experience, expertise and knowledge about gender-informed policies and practices and working with women in jails participated in the day and a half event. The format of the Summit included a series of plenary presentations and responses from practitioners followed by a discussion of their implications for working with women in jails. A written document(s) that articulates the key areas discussed during the Summit, along with action steps and strategies that jail practitioners can implement to improve practices will be the result of this Summit.

A list of participants, Summit goals and agenda and presentations can be found at (<http://cjinvolvedwomen.org/women-in-jails>). The following is a brief synopsis of the discussion, key points and implications for jails.

Setting the Stage: What Do We Know About Women in Jails?

Research supports the fact that women's pathways to criminal justice and some of their risk factors for continued involvement in criminal justice are different from men's. Thus it follows that to achieve more successful outcomes with justice-involved women, a gender responsive, trauma-informed approach is recommended. Summit faculty and participants noted a number of critical reasons for focusing on women in jails, including:

- Women are becoming an increasing portion of jail populations.
- Unless their needs and risk factors are addressed, women will continue to cycle in and out of jails.
- Women are largely arrested/convicted of lower level, nonviolent crimes and may be better served in local communities.
- Jails are uniquely positioned to divert women to community services and impact their further involvement in criminal justice.
- Understanding and acknowledging the impact on children when their mothers go to jail may further impact their children's future involvement in criminal justice.

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Some of the reasons contributing to an increasing number of women in jails and the criminal justice system were also discussed.

- Changes in legislation regarding arrest policies for drug use and sales, domestic violence (arrested for simple assault), and three strikes laws.
- Legislation and policies that serve as barriers to reentry (e.g., employment prohibitions, limited access to services).
- Use of gender-neutral assessment and classification tools not validated specifically for women which have the effect of over-classifying women into higher risk categories than necessary.
- Women have higher rates of mental illness and are often arrested for symptom-related behaviors.
- Poverty, lack of housing, and education (e.g., women become involved in criminal activity as an alternative to legal ways to make money).
- Women are more exposed in criminal enterprises; that is, they tend to get arrested more often than those higher up in the enterprise, and they may take the rap for men they are involved with.
- Women have a high prevalence of substance use/abuse (e.g., prescription drugs/opiate use and addiction).
- Because there are limited employment opportunities for women they are often forced to take low paying jobs that do not meet their needs or the needs of their children.
- Court responses (to failure to appear and/or failure to pay fines and fees) can drive women back to jail; often jail is seen as the easier solution to managing women's behaviors.

The Nexus of Jail Culture, Operational Practices and Trauma-Informed Care

Research suggests that women have high rates of trauma resulting from sexual and physical abuse and neglect. Their behaviors are often the result of the trauma they have experienced and many operational practices within jails can serve to alleviate or exacerbate their trauma symptoms. The following highlight some of the key points about culture and operational practices discussed by participants.

- Staff and inmates are similar in some ways (e.g. staff may suffer from trauma too) and both need to feel safe.
- Facility cultures are para-military in structure and a “code of silence” permeates the environment. Attending to trauma in meaningful ways is difficult in a “fear-based” facility.
- Some procedures that seek to enhance facility safety, like searches, may actually act as trauma triggers for some women.
- Women are relational and relational aggression among women inmates can be prevalent, and strategies to address it may be misdirected.
- An important part of creating a positive facility culture and helping women to heal should include building on their strengths and empowering them.

- Staff and inmates alike want to be respected – creating a facility culture that encourages and supports mutual respect is important.
- Jail is a horrible experience for women and staff don't always empathize with this fact.
- Many women entering jails have mental health issues; staff are not trained to understand this or recognize symptoms.
- Because there are more women—and women of many different ethnic groups—cycling in and out of jails, it is important to be aware of cultural issues as well.

Implications for Jails

- Staff training, education and skill building: gender responsiveness, trauma-informed care, recognizing mental health symptoms, working effectively with women, effective interventions.
- A positive and respectful facility culture will require leadership, staff and inmates working together toward this common goal.
- Change strategies need to be anchored in some way so that they are long lasting (and not as the result of a single champion, for example).
- Addressing trauma may require a paradigm shift such that staff are supported to acknowledge and interact with women inmates in different, more positive and respectful ways.
- With regard to sexual safety and Prison Rape Elimination Act (PREA) compliance, there is a need for leadership and staff to better understand relational safety and strategies to deal with relational aggression among women.
- In creating a more positive, trauma-informed culture, leadership should set the tone by involving staff in meaningful ways.
- A facility management team or multidisciplinary task force composed of jail staff, police, probation, advocates and others with clear goals can be an effective mechanism for developing and implementing change strategies within jails.

The Unmet Promise of Pretrial Assessment, Release and Referral

The unique gatekeeping function of jails provides many opportunities to identify women's issues related to serious mental health, substance abuse, trauma, housing, childcare, safety, and other issues, and perhaps for the first time. Many of these issues may be addressed by community, rather than criminal justice, services. Pretrial assessment and services can inform diversion decisions and other pretrial release options, and judges may be more likely to support jail alternatives if they have information about women's risk and needs. Summit participants further identified the following key points.

- In the past, information was not collected about pretrial, un-convicted persons. Over time, there has been a shift to gathering more information about risk and needs at the pretrial stage.
- For women, mental health is strongly related to failure to appear. A woman with mental health issues may not be able to manage the pretrial process very well which can

lead to bail revocation (e.g., she couldn't get childcare for initial court appearances, or went to the wrong courtroom).

- Level of risk and needs is also strongly related to failure to appear and success or failure on pretrial release.
- In addition to assessing for static measures of risk and criminal history, the conduct of a needs screening at jail booking might also be beneficial. For example, needs information may help jail and pretrial staff find appropriate services for women and may also avoid over-classification.
- In Hamilton County, OH, work in the pretrial and booking areas led to the creation of the Women's Intervention Program, which deals with substance abuse and dual-diagnoses treatment, and diverts women to appropriate services.
- Sharing pretrial assessment information is important. Examples of some counties who are working on these issues include:
 - Imperial County, CA will be implementing a pretrial assessment and then will be able to transfer information from arrest to adjudication.
 - Larimer County, CO Community Corrections is now able to get information from the case manager in the prison for use locally.
 - Cook County, IL secures permission from the women to share assessment data with relevant staff when women are transferred to prison.
 - In regards to concerns about implicating the defendant, some agencies have made deliberate decisions about who gets access to pretrial assessment information (e.g., Hamilton County does not provide needs assessment information to the court).
 - The Davidson County, TN Sheriff's Office is working with the public defender's office on pretrial issues.
- There is significant potential in the pretrial area; for example, building one case plan that can start at pretrial and be used during presentence and sentencing and for building a more systemic approach to assessment from pretrial through sentencing and supervision.
- Due to their smaller population size, we can be more ambitious when working with women than with men.
- The NRCJIW is currently piloting a gender responsive pretrial tool, the Inventory of Needs (ION) in Dutchess County, NY and Milwaukee County, WI.
 - In Dutchess County, it was reported that the women thus far feel positive about the implementation of the ION into the pretrial process, appreciate the time that officers are taking with them, and are enthusiastic about contributing to the research in this area.
 - Probation officers in Dutchess County say they never previously referred pretrial defendants or probationers to GR services and would not be doing so if not for the implementation of the ION.

Implications for Jails

- Implement GR risk and needs assessment tools at the pretrial stage that do more than measure failure to appear (because women’s risk often equates with unmet needs).
- Conduct staff training and education on pretrial issues and women. For example, pretrial certification training is available through the National Association of Pretrial Services Agencies (NAPSA).
- Establish partnerships and collaboration:
 - For sharing assessment information and data across agencies;
 - Between pretrial services and jail staff;
 - Between the jail and community services providers to assure that there is a continuum of services and programs;
 - With the defense bar (so that women understand their rights and the purposes of conducting pretrial assessments) and prosecutors.
- Educate criminal justice practitioners and jail staff so that they understand that gender neutral assessments are not enough; GR assessments plus gender neutral assessments are needed when working with women to truly understand their risk factors, needs and protective factors.
- Establish multidisciplinary policy teams to map out a plan for managing women in pretrial status; they should provide guidance and perhaps a decision making tool to staff who are make decisions/recommendations about whether a woman should be diverted, released on recognizance, etc.
- Establish a system-wide approach (e.g., courts, probation, human services, and the jail) to developing GR policies and procedures for release and for different populations (e.g., pretrial versus sentenced). Develop a roadmap for decision making within the first 24-48 hours; then collect additional information as needed once it is determined that the woman is staying in the jail.
 - Triage women according to a risk tool so that staff do not spend extensive time on women assessed as low risk (i.e., focus resources on medium and high risk women).
- Where programming slots are available, consider offering slots to the pretrial population (i.e., they would participate in programming along with sentenced women).
- Ensure that all assessments are coordinated and do not overlap. For example, jails may use a screen like the ION that can provide a risk measurement; then supplement that information with medical and mental health information, etc.

The Benefits and Challenges of Implementing Gender Responsive Assessment and Classification

There is growing research that suggests that an evidence-based, gender responsive approach to assessment and classification yields better results—better recidivism outcomes—for women. Generally, in the pretrial arena, there is limited research and studies have typically focused on jail populations. For women (and for men), it is important to understand what risk factors to be concerned with at the pretrial stage. For example, in one study in Hamilton County, OH, mental

health was related to pretrial failure to appear and the level of family support was also relevant. Additional issues discussed by participants included:

- Maximum custody women create less disciplinary infractions than men, but they have a higher proportion of misconducts than men.
- In studies of classification systems, high risk custody women looked more like medium custody men and medium custody women looked more like low custody men.
- The ION and Women's Risk and Needs Assessment (WRNA) were developed for public use and are no-cost. However there are training requirements before implementing.
- Cook County, IL uses the WRNA and is currently developing a classification risk tool to serve as a triage tool for women.
- If assessments are conducted, there must be a way to respond. That is, programs and services must be in place to address risk and needs.
- Currently, twenty-seven jurisdictions (states and localities) are using the WRNA but many are not and the data on women is still limited in many ways.

Implications for Jails

- Consider strategies for incentivizing small and medium jails to adopt GR assessment tools.
- Train and educate staff (see implications in sections above).
- Assure that assessment tools are easy to use and implement.
- Make funding sources (local, state, federal) more aware of the need for evidence-based AND GR programming for women.
- Build awareness about the needs of justice-involved women among jail staff and local criminal justice system stakeholders.
- Offer peer networking opportunities for staff so that they can connect with practitioners in other jurisdictions engaged in working with women.

Improving Programs and Services for Women in Jails

There are many challenges and gaps in providing jail-based programs and services for women, including physical plant constraints and the short periods of time that women are housed in jails. Continuity of services and a shared orientation and attitude about incarcerated women across agencies, jails and community providers is critical to providing effective programs and services. One example of an integrated treatment model developed in Cook County, IL was discussed:

- Initially, the Cook County Sheriff's Office started a treatment program for mothers of young children with substance abuse and mental health disorders (MOM's program).
- Now they also operate a 100 bed residential treatment program inside the jail. Group and individual therapy sessions are conducted in cells and other spaces when there are physical plant constraints. Only women officers staff the unit.
- An 8 hour GR training is offered to all Cook County Sheriff's Office staff through the training academy. Officers who work with the women receive an additional 8 hours of training.
- There is a specialty court for women with co-occurring disorders.

- Cook County has a specialty court for prostitution called Women in Need of Gender Services (WINGS).
- Treatment providers must comply with GR guidelines as stipulated in Requests for Proposals and through periodic evaluations.
- Treatment focuses on substance abuse, mental health and on empowering the women.
- Women in the program move through 3 program phases: 120 days in residential; community reentry; and then the empowerment center within the community.
- Many staff are peers or share similar experiences as the women with whom they manage.
- Studies conducted revealed the following profile of the women in the Cook County jail:
 - 75% of the women in the study sample met the clinical criteria for Post-Traumatic Stress Disorder (PTSD).
 - 4,500 women have been treated over 35 months.
 - Violent crimes are new for this population.
 - A majority of the women have co-occurring disorders.
 - The women typically have 8 or more arrests, are in jail for at least 90 days and not yet having success.

Other programs and issues mentioned include:

- Tulsa County, OK provides parenting classes and child visitation and case management within the jail.
- Larimer County, CO has a residential transition center (for women reentering from prison or as a last stop before prison) that offers 8 weeks of maternity leave outside of the facility and monthly prosocial activity (free or low cost) allowed with family.
- One programming challenge identified is that federally funded programs are not always long lasting and there are no clear strategies for picking up the funding once federal funds end.
- Another challenge is that women who most need programs can't always get access to them.

Healthcare and reproduction are primary issues for women entering jails, and many women receive their first gynecological exam when entering jails or prisons. A few of the issues identified related to health care services include:

- Transporting pregnant women offsite is a challenge.
- Doctors have to write a prescription for pregnant women to be assigned to a bottom bunk.
- Work assignments are not always adjusted for pregnant women.
- Restraints should not be used on pregnant women; if security issues are imminent, handcuffs in front are recommended so that a woman can still prevent herself from falling on her belly.
- Pregnant women who are incarcerated still retain their right to an abortion.
- Regarding the Affordable Care Act (ACA), the District of Columbia and San Francisco jails have both trained staff to serve as application counselors (to help women sign up for

healthcare prior to exiting the jail even though it won't take effect until they are out of the jail).

- The District of Columbia entered into a Memorandum of Understanding with the Office of Healthcare Finance to ensure that inmates' insurance is suspended rather than terminated during their incarceration; this is also a cost savings measure.
- Volunteer (and trained) doulas can be important support for women inmates giving birth.
- It is difficult to attract healthcare professionals that want to work with women in jails.
- Health screening in jails is an opportunity to engage women in a discussion about family planning.
- Another challenge is that medications are often taken away from the women when they enter the facility and it takes a while to be re-evaluated in order to re-prescribe medications.

The role of chaplains and volunteers were also discussed:

- Chaplaincy does more than provide spiritual guidance; they often provide many services including finding clothing, housing, childcare, etc. for the women.
- Chaplains are often "jacks of all trades" providing almost everything except security.
- Volunteers can be an integral part of the jail and also provide many programs and services.
 - The D.C. Department of Corrections is one example of an agency that provides regular in-service training for volunteers.
- One faith-based jail program in San Diego, CA that was discussed is called the Future Achievers in Reentry (F.A.i.R.):
 - It is run by the Welcome Home Ministries.
 - Stephanie Covington's curriculum is used in the F.A.i.R. dorm of the Las Colinas Detention Facility (LCDF).
 - Their motto is "dump the junk".
 - They have a community of volunteers that come into the facility to assist the women to build confidence, and help prepare them for release to the community.
 - There is a peer mentoring component.
 - Women also have an opportunity to develop community resources.

Implications for Jails

- Provide jails with information about evidence-based, GR programs and services.
- Work with jails to develop integrated and holistic programs for women that are also tied to community programming.
- Develop guidance for jails that help staff connect with community services in a meaningful way (e.g., for them to provide in-reach to jails) and also to evaluate these services.

- Establish a community providers' email group where jail staff can send out requests for help (e.g., a woman is getting out tomorrow and needs somewhere to live).
- Consult with jail staff as to the best time of day to deliver programs and services.
- Establish more effective collaboration between medical and security staff regarding the myriad of health issues facing justice-involved women and their implications (i.e., use of restraints for pregnant women, other needs for pregnant women).
- Further explore opportunities to sign up women under the ACA so that they can more easily access/afford services once released.
- Develop a GR "healthcare checklist" that jails can use when screening women that may include discussions about family planning and pregnancy testing.
- Develop guidance for jails regarding how best to approach contracted medical providers about asking family planning and pregnancy testing questions for women.
- Regarding medications:
 - Include questions in MOUs/contracts with medical staff about what to do when women enter jails with medications;
 - Identify a person in the jail to manage the processing of medication and prescriptions; and/or
 - Allow a nurse to be responsible for medications until a physician can re-evaluate the woman.
- Assure that health screenings triggers certain responses (e.g., additional health screenings or care, implementation of a medicine protocol, etc.).
- Assure that volunteers have adequate training and knowledge when working with justice-involved women.
- Consider the opportunities for establishing peer mentor programs.
- Include jail chaplains on multidisciplinary and management teams.
- Work more closely with jail chaplains to provide a full range of services for women in jails.

Reentry Considerations for Women Leaving Jails

Reentry begins at intake. One local model of reentry that was discussed is the *Transition from Jail to Community (TJC) initiative* managed by the Urban Institute and supported by National Institute of Corrections (NIC). Additional discussion points included:

- Jails don't have enough space to bring people together to do programming and that's one of the biggest constraints.
- Jails don't often have the capacity to continue working with women once they are released; to assure continuation of services, it is important to identify post-release partners—TJC was created to meet this challenge.
- Triage is a key concept to consider in jail reentry; that is, who is entering the jail, what is the jail's capacity to address their risk and needs, and what can be done to target limited resources to reduce their reoffending.
- There are many examples of counties who are working to improve jail transition and reentry, including:
 - Kent County, MI identified a single community entity to provide reentry services.

- Fresno County, CA is working to provide reentry services in the jail for those being released.
- Davidson County, TN established an automated community network so that they can better identify what is available in the community and link returning offenders with appropriate services.
- La Crosse County, WI has established a continuum of assessment and services at key decision points; programs and services are provided by human services.
- In Cook County, IL a task force on reentry meets regularly to exchange information on available resources.
- In Dutchess County, NY they are designing and implementing a Women's Center, which will provide services for women and be coordinated with the jail.
- The Urban Institute is in process of creating a "What Works in Reentry" clearinghouse and compiling studies of effective jail reentry programs— a little over half of the sample includes programs for men and women; very few include evaluated programs for women only.
- It may be more expensive to provide services for women and it may not be as attractive to invest in programs that have not been evaluated or that are specific to a particular population.
- Many women have long term mental health, substance abuse and co-occurring disorders which can be expensive to diagnose and treat.
- Technical issues (e.g., lack of phone privileges) create barriers to reentry for women who are incarcerated in jails.
- It is important to introduce women to community providers they may work with once released; this should be done during prerelease.
- For reentering women, the most useful services are often education, child and healthcare, and parenting classes.
- Women, like men, have problems securing identification and reinstating drivers' licenses when they are released. Two programs were identified that are addressing this issue:
 - The D.C. Department of Corrections provides a paper that authorizes released offenders to get a free drivers' license. They also provide offenders with a one page list of community resources upon reentry.
 - In Montgomery County, MD reentering offenders are issued a 60-day identification card and provided with a bus pass.

Implications for Jails

- Assure there is a seamless "hand off" between jails and communities.
- Identify community advocates for reentering women to help them navigate community programs and services.
- Address jail culture and attitudes: people can change; programming can address women's risk and needs.
- Capitalize on the fact that women are relational and help them to feel connected while they are incarcerated and continue to feel connected when they reenter into the community.

- Work with churches and faith-based organizations to better understand women and their challenges so they can be more effective in providing services.
- Develop strategies to assure that women have appropriate identification and/or drivers' licenses upon release.
- Establish a criminal justice council or a subcommittee focused on women in reentry.

Addressing Domestic Violence Issues among Justice-Involved Women

Many justice-involved women are victims of domestic violence and/or become entangled in the criminal justice system because of domestic violence involvement. Some of the discussion points about this topic included:

- Because of mandatory reporting of child sexual abuse, women may get caught up in criminal justice because of a “failure to protect” their children from abuse. Participants agreed this is a complicated issue for a number of reasons:
 - Child Protective Services only sees that there is an arrest in the home and often does not see the whole story.
 - Children are often removed from the home in cases where a woman may fail to protect her children (even though she may be a victim of abuse as well).
 - Law enforcement officers are not educated about the nuances of these cases and often see them as public nuisances.
 - Law enforcement officers are often not trained to discern primary from secondary aggressors in these cases.
 - Witnessing abuse without taking action to stop the abuse can result in a felony conviction despite many complicating issues surrounding domestic violence situations.
- Women held in jails on domestic violence related offenses often don't see themselves as offenders and don't see domestic violence programming as applicable to them.

Implications for Jails

- Train staff on how to ask women sensitive questions about domestic violence involvement during assessments and what appropriate responses should be when a woman reports abuse.
- Educate staff to understand and recognize sexual violence among women.
- Establish collaborative partnerships between the domestic violence community, corrections and Child Protective Services.
- Provide resources on domestic violence programs and services in the jail visitation area.

Areas for Further Exploration (but not discussed during the Summit)

Participants identified a number of additional issues and significant gaps related to women in jails that were not discussed during this Summit but can be pursued at a future time.

- Children (attention to prevention and working with caregivers)
- Lack of support from family and friends

- Employment and economic challenges
- HIV risk reduction and care
- Cultural issues among diverse populations of women
- Lack of funding for programs, services, etc.
- Provision of early intervention for young women who cycle in and out of the jail frequently
- Human trafficking

Summary of Topics to be addressed through the Development of a Written Brief/Resources for Jails

As a result of the Summit topical discussions and implications for jails, the following list was developed that organizes and prioritizes possible products for further development.

- **Expand/develop training and support for jail staff**
 - Understanding trauma
 - The basics of gender responsiveness and effective strategies for working with women
 - Effective communication skills
 - Understanding domestic violence issues
 - Effective interventions (for de-escalating incidents, enhancing safety and security)
 - Self-care and the effects of vicarious, or secondary, trauma (e.g., what resources are available to staff, what is vicarious trauma, etc.)
 - Support staff participation in available certification programs (i.e., through the American Jail Association, American Correctional Association, etc.)
- **Address organizational change and leadership**
 - Develop strategies for “anchoring the change”
 - Develop strategies for empowering and working strategically with staff
 - Using respectful language
 - Partner with the National Association of Counties (NaCO) and county governments to effect changes in jails
 - Address jail culture issues
 - Partner with chaplains
- **Encourage collaborative, multidisciplinary approaches**
 - Establish partnerships between jails and community providers to address numerous issues (e.g., domestic violence, transition and reentry, etc.)
 - Establish a continuum of assessment, services, information and data sharing
- **Develop success stories**
 - Support the conduct of program evaluations
 - Conduct town hall meetings, focus groups, etc. with women in jails to hear and share their stories

- Develop a list of evidence-based, gender responsive and promising practices for working with women in jails
- Highlight the benefits of working with women in jails
- **Develop the roadmap (What would a gender responsive approach look like at each decision point?)**
 - Assessment, classification and triage
 - Prevention/diversion
 - Pretrial
 - Presentenced and sentenced
 - Referral
 - Case planning
 - Peer support
 - Programming
 - Transition and reentry
- **Identify strategies for small jails**
 - Develop strategies for reaching out to small jails and making them aware of issues related to women in jails
 - Make small jails aware of the Gender Responsive Policies and Practices Assessment (GRPPA)—a self-assessment tool developed by NIC (<http://nicic.gov/grppa/instructions.aspx>)
 - Develop a fact sheet on the benefits and costs of working with women in jails
- **Establish a common vision for working with women in jails**
 - Support the development of a common vision for working with women in jails across correctional and community agencies such that they are all working towards the same vision
- **Make jails more aware of resources available**
 - Advertise and conduct outreach about available training and technical assistance resources available to them
 - Send them tools and checklists (and develop new ones) that can help them more easily operationalize gender responsive policies and practices

Development and Dissemination Suggestions for the Summit's Written Product(s)

The following summarizes suggestions made by participants in regards to the development of products for jail practitioners:

- Develop tools like pocket cards, checklists, brochures, and posters.
- Develop educational videos.

- Offer webinars as a repository for ongoing dialogue.
- Develop a list of consultants and practitioners with jail expertise who can provide training and technical assistance on gender responsive issues.
- Conduct a second Jail Summit to obtain feedback and address additional issues.

The following summarizes suggestions made by participants for disseminating written products and other tools and resources to jail practitioners:

- Be clear about the audience (practitioners, policymakers, etc.) for written products.
- Focus written products on making practitioners aware of resources that are already available to them.
- Send periodic emails to jail practitioners about available resources.
- Utilize NIC forums such as its GR e-newsletter.
- Add a discussion thread to AJA's website and utilize the AJA e-newsletter as an effective method for awareness building and dissemination of resources.
- Develop a brochure, centerfold and/or inserts to be included in the AJA Jails Magazine which is distributed to all jails in the country.
- Establish a partnership with the NaCO and target some documents to county managers and commissioners.