



**COMMONWEALTH OF MASSACHUSETTS**

**ADULT DRUG COURT CERTIFICATION MANUAL**

**MARCH, 2016**

---

---

## INTRODUCTION

The Executive Office of the Trial Court has committed to certifying Adult Drug Courts in the Commonwealth of Massachusetts. The certification standards are adapted from the Ten Key Components for Drug Courts developed by the Bureau of Justice Administration (BJA) in collaboration with the National Association of Drug Court Professionals (NADCP). That document is available on the CoE website ([www.maco.e.org/resources/manuals](http://www.maco.e.org/resources/manuals)).

The rationale behind the Massachusetts Certification system is that Adult Drug Courts should operate within the guidelines provided by the Ten Key Components. The specific standards have been adapted to be relevant to Massachusetts and to be measurable. For each item, the Certification Team will determine “Standard met”, “Stand mostly met, only minor modifications needed,” or “Standard not met, major modifications needed.” In addition to rating each item, the team will provide a brief description of the data obtained that informed the rating. If modifications are needed, recommendations will be offered to the Drug Court team to aid in meeting the standard.

After rating each of the items, the Certification Team will make a summary recommendation: Recommend certification; Recommend certification with minor modifications; or Recommend second review after modifications. The rationale for this summary recommendation will also be provided. The recommendation will be submitted to the Departmental Chief Justice. When the Departmental Chief Justice is satisfied that certification should be recommended, he/she will forward the recommendation to the Chief Justice of the Trial Court. The final decision on certification will be made by the Chief Justice of the Trial Court.

---

---

---

## **Key Component #1: Drug courts integrate alcohol and other drug treatment services with justice system case processing**

Effective Drug Courts employ a coordinated response to offenders whose criminal behavior is associated with a substance abuse problem. The goals are to reduce recidivism and to promote recovery. Realization of these goals requires collaboration and a team approach, including judges, prosecutors, defense counsel, probation, other corrections and law enforcement personnel, and service providers. The mission, procedures, and expectations are clearly articulated to prospective drug court participants.

**1a. Drug court team includes all of the following: Judge, Probation Officer, Defense Attorney, Prosecuting Attorney, Treatment Provider(s)**

\_\_\_\_\_ Standard met

\_\_\_\_\_ Missing elements (specify)

**Comments and Recommendations:**

**1. 1b. A participant manual is provided to all drug court participants that clearly spells out Drug Court's mission, goals, eligibility criteria, operating procedures, and performance measures, including incentives and sanctions.**

\_\_\_\_\_ Standard met

\_\_\_\_\_ Standard mostly met, only minor modifications needed

\_\_\_\_\_ Standard not met, major modifications needed

**Comments and Recommendations:**

**1c. Participants are clearly informed (in writing) of expectations, including expectations for abstinence from licit and illicit drugs and law-abiding behaviors.**

\_\_\_\_\_ Standard met

\_\_\_\_\_ Standard mostly met, only minor modifications needed

\_\_\_\_\_ Standard not met, major modifications needed

**Comments and Recommendations:**

---

---

1d. The court and treatment providers maintain ongoing communication, including frequent exchanges of timely and accurate information about the individual participant's overall program performance

\_\_\_\_\_ Standard met

\_\_\_\_\_ Standard mostly met, only minor modifications needed

\_\_\_\_\_ Standard not met, major modifications needed

Comments and Recommendations:

1e. The judge reviews treatment progress and responds promptly to each participant's positive efforts as well as to noncompliant behavior.

\_\_\_\_\_ Standard met

\_\_\_\_\_ Standard mostly met, only minor modifications needed

\_\_\_\_\_ Standard not met, major modifications needed

1f. Interdisciplinary education is provided for every person involved in drug court operations to develop a shared understanding of the values, goals, and operating procedures of both the treatment and justice system components.

\_\_\_\_\_ Standard met

\_\_\_\_\_ Standard mostly met, only minor modifications needed

\_\_\_\_\_ Standard not met, major modifications needed

Comments and Recommendations:

---

---

---

## **Key Component #2: Using a nonadversarial approach, prosecution and defense counsel promote public safety while protecting participants' due process rights**

The approach in Drug Court differs from traditional courts, as the focus is on the participant's recovery and law-abiding behavior. To facilitate an individual's progress in treatment, the prosecutor and defense counsel must shed their traditional adversarial courtroom relationship and work together as a team. Once a defendant is accepted into the drug court program, the team's focus is on the participant's recovery and law-abiding behavior—not on the merits of the pending case. The prosecuting attorney protects public safety by ensuring that individuals accepted into drug court are appropriate candidates, and comply with drug court requirements. The defense counsel encourages the participant to fully engage with treatment and court-ordered requirements, while fully protecting the participant's due process rights.

2a. Prosecutors and defense counsel participate in the design of screening, eligibility, and case-processing policies and procedures to guarantee that due process rights and public safety needs are served.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

2b. For consistency and stability, the judge, probation officer, prosecutor, and court-appointed defense counsel should be assigned to the drug court for a sufficient period of time to build a sense of teamwork. A consistent back-up for these positions is assigned.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

2c. The prosecuting attorney:

- Reviews the case and makes a recommendation about the defendant's eligibility for the drug court program from a public safety perspective.
  - Files all necessary legal documents.
-

- 
- Participates in a coordinated strategy for responding to positive drug tests and other instances of noncompliance.
  - Agrees that a positive drug test or open court admission of drug possession or use will not result in the filing of additional drug charges based on that admission. This agreement is memorialized in a written Memorandum of Understanding.
  - Makes recommendations regarding the participant's continued enrollment in the program based on performance in treatment rather than on legal aspects of the case, barring additional criminal behavior.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

2d. The defense counsel:

- Reviews all relevant information about the underlying charge, and reviews all program documents (e.g., waivers, written agreements).
- Advises the defendant as to the nature and purpose of the drug court, the rules governing participation, the consequences of abiding or failing to abide by the rules, and how participating or not participating in the drug court will affect his or her interests.
- Explains all of the rights that the defendant will temporarily or permanently relinquish.
- Gives advice on alternative courses of action, including legal and treatment alternatives available outside the drug court program, and discusses with the defendant the long-term benefits of sobriety and a drug-free life.
- Explains that because criminal prosecution for admitting to alcohol and drug use in open court will not be invoked, the defendant is encouraged to be truthful with the judge and with treatment staff, and informs the participant that he or she will be expected to speak directly to the judge, not through an attorney.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

---

---

Comments and Recommendations:

### **Key Component #3: Eligible participants are identified early and promptly placed in the drug court program**

Effective Drug Courts enroll participants in a timely and rapid manner. There is a standardized, evidence-based process for identifying individuals who meet criteria for Drug Court. This process includes assessment of risk for recidivism, severity of substance abuse, and suitability for treatment. Once accepted into Drug Court, individuals are promptly enrolled in treatment. Such prompt enrollment is essential to take advantage of the critical window of opportunity provided by court involvement.

3a. Eligibility screening is based on established written criteria and a standardized process.

\_\_\_\_\_ Standard met

\_\_\_\_\_ Standard mostly met, only minor modifications needed

\_\_\_\_\_ Standard not met, major modifications needed

Comments and Recommendations:

3b. Eligible participants for drug court are promptly advised about program requirements and the relative merits of participating.

\_\_\_\_\_ Standard met

\_\_\_\_\_ Standard mostly met, only minor modifications needed

\_\_\_\_\_ Standard not met, major modifications needed

Comments and Recommendations:

3c. Trained professionals screen drug court-eligible individuals for substance abuse problems and suitability for treatment.

\_\_\_\_\_ Standard met

\_\_\_\_\_ Standard mostly met, only minor modifications needed

\_\_\_\_\_ Standard not met, major modifications needed

Comments and Recommendations:

---

---

3d. The court requires that eligible participants enroll in treatment services promptly.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

---

---

## **Key Component #4: Drug courts provide access to a continuum of alcohol, drug, and other related treatment and rehabilitation services**

Individuals who are involved in Drug Court have a wide variety of needs, and effective treatment requires attention to the range of needs particular to the individual. Effective Drug Courts engage with treatment providers to ensure access to treatment services, including detoxification, substance abuse treatment (including Medication Assisted Treatment), mental health treatment, treatment for trauma-related disorders, and treatment for medical disorders. In addition, effective treatment requires assistance with other criminogenic needs, including housing, employment, and factors that contribute to maintenance of antisocial attitudes and behavior. Furthermore, treatment should be individualized to be most effective (taking into account language issues, co-occurring disorders, and other Responsivity factors).<sup>1</sup>

Effective treatment requires ongoing monitoring and assessment of progress. It is important that there be ongoing communication between the treatment providers and the Drug Court personnel to allow prompt response to successes and setbacks.

4a. Individuals are initially screened and thereafter periodically assessed by both court and treatment personnel to ensure that treatment services and individuals are suitably matched:

- There is an assessment completed at treatment entry to establish a baseline.
- Ongoing assessment conducted to monitor progress, to change the treatment plan as necessary, and to identify relapse cues.
- If various levels of treatment are available, participants are matched to programs according to their specific needs. Guidelines for placement at various levels should be developed.
- Screening for infectious diseases and health referrals occurs at an early stage.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

---

---

---

4b. Treatment services are comprehensive:

- Services should be available to meet the needs of each participant.
- Treatment services that are available to participants cover a wide range of needs, including: individual and group counseling; relapse prevention; 12-step self-help groups; preventive and primary medical care; medical detoxification; Medication Assisted Treatment; treatment for trauma-related issues; treatment focused on criminogenic needs
- Other needs are addressed as appropriate, including housing; educational and vocational training; legal, money management, and other social service needs.
- Specialized services are available for participants with co-occurring substance use and mental health disorders.
- Treatment programs or program components are designed to address the particular treatment issues of women and other special populations.
- Treatment is available across a range of settings, including detoxification, acute residential, day treatment, outpatient, and sober living residences.
- Services are available to provide ongoing assessment of participant progress and needs, to coordinate referrals to services in addition to primary treatment, to provide structure and support for individuals who typically have difficulty using services even when they are available, and to ensure communication between the court and the various service providers.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

---

---

4c. Treatment services are accessible:

- Accommodations are made for persons with physical disabilities, for those not fluent in English, for those needing child care, and/or for persons with limited literacy, when possible.
- When possible, treatment facilities are accessible by public transportation, or other transportation options are developed.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

4d. Provisions are made to enroll participants in MassHealth or other insurer, as appropriate.

- Written agreements have been developed with treatment providers to ensure service delivery commitments.
- Fee schedules are commensurate with an individual's ability to pay. However, no one should be turned away solely because of an inability to pay.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

4e. Treatment services have quality controls:

- Direct service providers are certified or licensed where required, or otherwise demonstrate proficiency according to accepted professional standards. Providers utilize standardized treatment manuals.
- Treatment staff participate in relevant education and training, and receive ongoing clinical supervision as appropriate.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

---

---

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

4f. Treatment agencies are accountable:

- Treatment agencies give the court accurate and timely information about a participant's progress. Information exchange complies with the provisions of 42 CFR, Part 2 (the Federal regulations governing confidentiality of alcohol and substance abuse patient records) and with applicable State statutes.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

4g. Treatment designs and delivery systems are sensitive and relevant to issues of race, culture, religion, gender, age, ethnicity, and sexual orientation.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

---

---

---

## **Key Component #5: Abstinence is monitored by frequent alcohol and other drug testing**

A key element in Drug Court is monitoring abstinence by frequent and random Alcohol and other Drug (AOD) testing. Drug Courts should have access to drug testing that is reliable, valid, and promptly available. Results of AOD should be provided promptly to the Drug Court, so that appropriate responses can be undertaken.

5a. Alcohol and other drug testing policies and procedures are based on established and tested guidelines. Contracted laboratories analyzing urine or other samples should also be held to established standards.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

5b. Testing should be frequent, random, comprehensive, and reliable.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

5c. The scope of testing is sufficiently broad to detect the participant's primary drug of choice as well as other potential drugs of abuse, including alcohol and marijuana.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

---

---

5d. The drug-testing procedure must be certain. Elements contributing to the reliability and validity of a urinalysis testing process include, but are not limited to:

- Direct observation of urine sample collection.
- Verification temperature and measurement of creatinine levels to determine the extent of water loading.
- Specific, detailed, written procedures regarding all aspects of urine sample collection, sample analysis, and result reporting.
- A documented chain of custody for each sample collected.
- Quality control and quality assurance procedures for ensuring the integrity of the process.
- The court utilizes all drug protocols available through the Officer of the Commissioner of Probation
- Flexibility to add testing for additional substances is available.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

5e. The time between sample collection and availability of results should be short.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

5f. The court is promptly notified when a participant has tested positive, has failed to submit to alcohol or other drug testing, has submitted the sample of another, or has adulterated a sample.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

---

---

5g. The coordinated strategy for responding to noncompliance includes prompt responses to positive tests, missed tests, and fraudulent tests.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

5h. Participants should be consecutively abstinent for a minimum period of time prior to program graduation.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

---

---

## **Key Component #6: A coordinated strategy governs drug court responses to participants' compliance**

The nature of substance use disorders is that it is a chronic disorder, often marked by relapses. In recognition of this fact, Drug Courts employ a continuum of responses to both continued substance use/noncompliant behavior, as well as positive behaviors. This continuum should include graduated sanctions, as well as incentives that increase with continued compliance.

6a. Treatment providers, the judge, the probation officer, and other program staff maintain frequent, regular communication to provide timely reporting of progress and noncompliance and to enable the court to respond immediately. Procedures for reporting noncompliance are clearly defined in the drug court's operating documents.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

### **Comments and Recommendations:**

6b. Responses to compliance and noncompliance are explained verbally and provided in writing to drug court participants before their orientation. Periodic reminders are given throughout the treatment process.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

### **Comments and Recommendations:**

6c. The responses for compliance vary in intensity and include :

- Encouragement and praise from the bench.
  - Ceremonies and tokens of progress, including advancement to the next treatment phase.
  - Decreased frequency of court appearances.
  - Reduced fines or fees.
  - Reduction in the term of probation.
  - Reduced or suspended incarceration.
  - Graduation.
-

---

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

6d. Responses to or sanctions for noncompliance include a range of options such as:

- Warnings and admonishment from the bench in open court.
- Increased frequency of testing and court appearances.
- Increased monitoring and/or treatment intensity.
- Required community service or work programs.
- Escalating periods of jail confinement
- Termination from the program.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

---

---

---

## **Key Component #7: Ongoing judicial interaction with each drug court participant is essential**

The leader of the Drug Court is the judge. The role of the judge in Drug Court differs from traditional judicial roles. The Drug Court judge interacts directly with drug court participants, and should provide encouragement for positive behaviors, as well as consequences for noncompliance. The judge should be prepared to explain to the participant the reasons for consequences, and the expectations for future behavior. To accomplish this, the judge should be knowledgeable about substance use disorders and the available treatments.

7a. Regular status hearings are used to monitor participant performance:

- Frequent status hearings are held during the initial phases of each participant's program. Status hearings should be held not less than every two weeks unless the participant is in residential treatment and there is a transportation issue.
- Time between status hearings may be increased or decreased, based on compliance with treatment protocols and progress observed.
- Drug court participants appear at a single session, and remain in the courtroom for the duration of the session, thereby allowing participants to learn from others' experiences.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

7b. The court considers the participant's treatment engagement when it imposes incentives and sanctions to match the participant's treatment progress.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

---

---

7c. The participant's financial ability to fulfill court-ordered obligations is taken into account.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Data:**

---

---

## **Key Component #8: Monitoring and evaluation measure the achievement of program goals and gauge effectiveness**

Effective functioning of a Drug Court requires ongoing collection of data and information to inform improved practice. The EOTC has identified required data elements that each court should collect in order to be able to evaluate the court's effectiveness. The Drug Court should have capacity to analyze these data, as well as incorporate other feedback, in order to modify and improve practices that will meet the program goals.

8a. All the data fields required by the EOTC are collected and entered into a database approved by EOTC.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

8b. Monitoring and management data are reviewed periodically by Drug Court personnel.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

8c. Data collection and entry are done in a manner that protects against unauthorized disclosure of sensitive personal information about individuals.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

---

---

8d. Process evaluation activities should be undertaken throughout the course of the drug court program.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

---

---

---

## **Key Component #9: Continuing interdisciplinary education promotes effective drug court planning, implementation, and operations**

All personnel involved in Drug Court should receive specialized education and training about substance use and Drug Court best practices. This should include both introductory training, as well as ongoing education.

9a. Key personnel have attained a specific level of basic education, as defined in staff training requirements and in the written operating procedures.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

9b. The operating procedures should also define requirements for the continuing education of each drug court staff member.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

**Comments and Recommendations:**

---

---

---

## **Key Component #10: Forging partnerships among drug courts, public agencies, and community-based organizations generates local support and enhances drug court program effectiveness**

Drug Courts function best when they are supported by the public, as well as other public and community-based organizations. The Drug Court utilizes appropriate platforms for such coordination, including providing information on a website, and/or community or regional meetings.

10a. Representatives from the court, community organizations, law enforcement, prosecution, defense counsel, and other community groups meet yearly to provide guidance and direction to the drug court program.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

### **Comments and Recommendations:**

10b. Drug court programs and services are sensitive to and demonstrate awareness of the populations they serve and the communities in which they operate. Drug courts provide opportunities for community involvement through forums, informational meetings, material posted on their website, or other community outreach efforts.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

### **Comments and Recommendations:**

10c. Drug Court personnel receive cultural competence training.

\_\_\_\_\_ **Standard met**

\_\_\_\_\_ **Standard mostly met, only minor modifications needed**

\_\_\_\_\_ **Standard not met, major modifications needed**

### **Comments and Recommendations:**

---

---

---

**SUMMARY RECOMMENDATION**

\_\_\_\_\_ **RECOMMEND CERTIFICATION**

\_\_\_\_\_ **RECOMMEND CERTIFICATION WITH MINOR MODIFICATIONS**

\_\_\_\_\_ **RECOMMEND SECOND REVIEW AFTER MODIFICATIONS**

**RATIONALE FOR RECOMMENDATION:**

---