



Youth Justice Oversight Committee

Grants Process Workgroup

February 6, 2025 – Meeting Minutes

MEETING DETAILS

Date and Time: February 6, 2025; 9:00-noon EDT

Location: 251 N. Illinois Street, Room 1648, Indianapolis, IN 46204

Minutes Prepared by Nancy Wever, Staff to Workgroup

ATTENDEES

Members Present in Person: Judge Schein, Devon McDonald, Rachel McCaffrey, Tracy Fitz, Michael Moore, Chris Biehn, Shannon Hickey, Robb Backmeyer, Judge Kenworthy, Chris Biehn, Ellen Sheets

Members Present Electronically: N/A

Members Absent: Angela Comsa

Guests: Cooper Stratton, Rebecca Venus

Staff Present: Nancy Wever

WELCOME AND INTRODUCTIONS

Devon McDonald and Judge Schein convened the meeting. Members and guests introduced themselves.

APPROVAL OF MINUTES

Minutes from the August 2024 meeting were unanimously approved on motion by Tracy Fitz and seconded by Amber Becker.

REVIEW OF PROCESS

Devon reviewed the scoring process. ICJI receives the applications and scores them internally.

Workgroup members are assigned which applications to review and score, and an average score is computed. The workgroup convenes to discuss the applications and individual scores, ultimately voting on funding recommendations to the Youth Sub-Committee of the ICJI Board. The Youth Sub-Committee makes recommendations to the Board of Trustees, which is the entity that awards the grants. The Board of Trustees meets on March 7th. Until those decisions are made, the recommendations of the workgroup should not be shared with applicants. Questions about the grants should be directed to ICJI.

Devon explained the process of funding allocation. There was \$60M allocated in FY2023 and the funds became available 7/1/2023. This is an appropriation that goes from the general fund to a passthrough fund then to ICJI. By statute, ICJI has three separate funds: Community Alternatives, Diversion, and Behavioral Health. The allocation is non-reverting which means that ICJI can award them until they are depleted.

Judge Schein asked questions about the current formula and if counties can be awarded additional funds in subsequent solicitation periods, even if they max out the amounts eligible. There is legislation pending that would allow flexibility in the formula as well as align the language regarding administrative costs and requiring collaborative service planning.

REVIEW AND DISCUSSION – GRANT APPLICATIONS

Community Based Alternatives to Detention

CEASe of Scott County

The application is to support the creation of a Day Reporting Program. Funding requested is \$124,049.00. Average score = 64.5.

Discussion:

The application indicated good local collaboration and demonstrated need. Technical assistance is needed regarding the program goals and objectives to ensure they are measurable. Given that the application includes intent to use certified peers and there is not credentialing specific for those working with youth, the application acknowledged this and addressed it satisfactorily.

There are some discrepancies between their budget and application, as the application indicates the funded staff will be new hires, but the budget identifies current employees who are funded by other grants as those whose positions will now be funded by this new grant. ICJI will work with the applicant to correct the budget documents.

The application was unanimously recommended for full funding on motion by Judge Schein and seconded by Judge Kenworthy.

*****NOTE: Following the recommendation and vote, it was determined that Scott County is eligible for a maximum of \$90,000 and cannot be funded for the requested amount of \$124,049.00.*****

Clark County Probation Department

The application is to fund technical assistance from the RFK National Resource Center to create policies regarding dual status youth. Funding requested is \$80,000. Average score = 66.5.

Discussion:

The application lacked specificity and included several omissions. For example, although it states that the program is evidence-based, it does not identify what that program is. Additionally, there was no sustainability plan and no evidence of collaborative service planning as required by statute (e.g., letter of endorsement). There is a request for an additional \$16,000 for travel for the contractors, but the proposal from RFK indicates the travel is included in the \$62,000. The proposal seeks \$80,000, but the budget breakdown adds up to \$78,000.

Additionally, there are questions about need. Indiana has several training materials about Dual Status Youth that could be utilized. There is no data included that indicates a need or identify this as an area of focus. Also, there are not clear goals identified and no objectives or outcomes that are clearly defined. Nancy Wever advised that Clark County is scheduled to undergo a JDAI Tenured Site System Assessment and this is another available resource, as it could focus on processes for dual status youth.

A recommendation to deny the funding request was unanimously passed on motion by Amber Becker and seconded by Rachel McCaffrey.

*****Note: The Dearborn County Probation Department and the Dearborn & Ohio County Prosecutor's Office each submitted a grant application, one in the Community-Based Alternatives category and one in the Diversion category. Because these serve the same counties, they were reviewed by the workgroup consecutively.*****

Dearborn County Probation (Community-Based Alternatives category)

The application is to support the creation of a Day Reporting Program. Funding requested is \$170,000. Average score = 76.

Discussion:

Concern was raised regarding the scope of the funding request, including the equipment. Additional discussion included questions about transportation, specifically for the youth from Ohio County, and the need for technical assistance to refine their goals and objectives. The need for the program is not clearly supported by data – although there was data provided about the increased number of cases, there was nothing to support that the program will service 100 youth (i.e., how many youth were suspended or expelled in the past school years, etc.). This could lead to net-widening if a program is developed and there is a sense of urgency to fill slots. Other members raised concern about having at-risk youth (presumably those not under the jurisdiction of the Court) “ordered” into a program that is housed at the courthouse and having “consequences for non-compliance...imposed at a formal court hearing”.

There are some questions about the budget. For example, the request for health insurance is almost equal to the salary for the Program Implementation Coordinator. The Budget Narrative indicates that the “...full time employee will need to be a certified Probation Officer...”, but the salary request is only for \$15,866.63. The job description indicates responsibility for duties outside the program. Also, there is a request for seven laptop devices, but the narrative indicates the school systems are responsible for providing “computer equipment” and it is not clear what the need is for a phone.

There is not evidence of collaborative service planning as required by statute. The letter of endorsement was provided by the Judge who appoints the probation officers.

Dearborn & Ohio Counties Prosecutor's Office (Diversion category)

Funding is requested for a Coordinator for a newly launched Attend and Engage Program who will also explore diversion programming for offenses other than Truancy. Additional funding is requested to modernize the prosecutor's office in Ohio County. Average score = 75.5.

Discussion:

Generally, there is support for the application. However, some of the same questions about the budget in the application for the Day Reporting Program exist in this one. For example, the employee benefits exceed the salary amounts. This application indicates that the same employee (referenced as one hired by the Circuit Court) will serve as the Coordinator for both projects, but the application for the Day Reporting Program indicates 100% of that person's time will be spent on that program. Similar to the Day Reporting Program application, there is a request for equipment, furnishings, etc. to modernize the prosecutor's office in Ohio county. It is not clear how this relates to the Coordinator for the Program who is not an employee of the prosecutor's office. Also, the application includes a request for laptops for two employees of the prosecutor's office because they are “malfunctioning”. It is not clear if these funds are supplanting technology allowances that are budgeted locally.

The applications were unanimously recommended to approve funding, on condition that technical assistance be provided to improve the goals and objectives (Day Reporting Program), remedy the budget concerns both applications – justification and documentation), and clarify transportation requirements (Day Reporting Program). ICJI and the IOCS Youth Justice Team will work jointly to provide technical assistance. The motion was made by Judge Schein and seconded by Chris Biehn.

*****Note: The Jennings County Probation Department submitted two applications, one in the Community-Based Alternatives category and one in the Diversion category. Because these serve the same county and were submitted by the same entity, they were reviewed by the workgroup consecutively.*****

Jennings County Probation (Community-Based Alternatives category)

Funding is requested for three programs: an “MRT parenting program”, Parenting the Teen Brain, and an MRT curriculum to address trauma. Average score = 55.

Discussion:

Concerns were raised about the lack of quantitative data to support the need, the curriculum for the parenting program is not identified to determine if certification is required for facilitation, the trauma curriculum is not identified (the curriculum found through internet search is for adults, not youth and requires certification by DMHA to facilitate), and the research cited is not related to the specific programs. Additionally, almost all of the funding is for probation or other court staff, it is not clear if these funds will supplement or supplant current salaries. For Parenting the Teen Brain, it is not clear if the applicant intends to use training for trainers or to pay an outside entity to regularly conduct the training.

The letter of endorsement was not signed, although the designated signer was the same as the applicant. This does not demonstrate collaborative service planning as required by statute. The sustainability plan was vague. There was no timeline attached. It appears there were adverse findings in an audit in 2023, but there was no description of these as requested in the application.

Jennings County Probation (Diversion category)

Funding is requested for MRT programming used as diversion from referral to the court, with the specific request to hire a new juvenile probation officer to implement the curriculum. Average score = 82.5.

Discussion:

Similar concerns were raised with this application as with the community-based alternatives application. The application states that the programming will be utilized in lieu of referral to the court for behaviors such as use of vaping devices, bullying and oppositional defiance. However, none of these behaviors are referable offenses. There is a lot of anecdotal information included with very little quantitative data included. The MRT curricula that are identified require certification from DMHA to implement. The goals, objectives and outcomes need to be more specific.

The request is to fund the salary for a new juvenile probation officer. The application requests 100% of the funding, but the narrative indicates only 70% of their time will be spent on the program in the first year and 90% in the second year. The sustainability plan states that there has been approximately \$500,000 remaining in a fund for the last three years. It is not clear why the department is seeking grant funding for a position rather than using those funds.

The letter of endorsement was signed by the author of the application, which appears to be a conflict of interest.

The applications were unanimously recommended to deny funding on motion of Judge Kenworthy and seconded by Shannon Hickey.

Lake County Juvenile Center

The funding request is for a program for youth referred to the system for offenses involving firearms. Average score = 85.5.

Discussion:

The application included data to support the need as well as outcomes from previous cycles of the program. The identified goals, objectives, and outcomes are not clearly defined or measurable and one of their goals appears to be a lower level of success than previously achieved. The program has been previously funded by their JDAI grant, but on condition that they not conduct the jail visits, as they violate the federal and state laws regarding sight and sound separation of youth and adults in facilities. This application includes visits to the jail in the program description. Additional questions were raised about the use of visits to the morgue as an effective program component. Some of the components appear to mirror a "scared straight" approach that has proven ineffective and should not be supported with funding.

Regarding the budget, there are questions about salary to the bookkeeper. It appears this position is a full-time position paid by county general funds, yet there is a request for \$4,500 for one year for this person, as 100% of their salary. Is the ask to supplant the current salary or to provide a raise for the position for one year? Similarly, there is a request for 100% of this position's benefits to be paid by the grant for \$983.25. The funding request for incentives seems excessive, as it equates to \$200 per youth over the 10-week program. For the Coordinator, there is not a person identified, yet the application indicates there is one currently employed.

There was no sustainability plan submitted and the letter of endorsement was not demonstrative of collaborative service planning with stakeholders in the youth justice system.

The application was unanimously recommended for approval of funding, with the conditions that the program remove the jail and any other visits to correctional facilities, technical assistance be provided to improve their goals and objectives, remedy the budget concerns regarding supplanting funds, and submission of required documents. ICJI and the IOCS Youth Justice Team will work jointly to provide technical assistance. The motion was made by Tracy Fitz and seconded by Amber Becker.

Martin County Community Corrections

Funding is requested to hire a part-time case manager who will provide programming for youth and for equipment, training, supplies, curriculum, etc. related to that programming. Average score = 78.

Discussion:

There is general support for the content of the application, although there is not a clear connection to how the programming may reduce use of secure detention. The programming is focused on basic life skills and social skills which is likely needed and beneficial. However, unless detention is used for youth who lack these skills, how will it reduce admissions to secure detention? Members discussed that this

seems to more closely align with a diversion grant. Devon McDonald and Ellen Sheets advised that it is possible for the applicant to apply in the correct category. ICJI can help with this, as it will require re-opening the RFP for a brief period to allow for this.

There was no sustainability plan or timeline submitted.

Nancy Wever moved for approval of funding through the diversion category and Shannon Hickey seconded the motion. It passed unanimously.

Perry County Circuit Court

Funding is being requested for Project PATH, to be implemented at two high schools in Perry County. The Project components include daily reporting/check-ins with the School Resource Officer (SRO), restorative justice practices, and enhancement of afterschool programs. Average score = 88.

Discussion:

Generally, there is support for Project PATH. However, clarification is needed regarding the population to be served. The application identifies both “at-risk” youth and youth who are involved with the justice system. There is concern of the danger of net widening if the program includes youth who are not under the jurisdiction of the court and the inclusion of drug testing. Regarding the budget, it is not clear if the funds for the SROs and social workers may be supplanting their regular salaries.

Nancy Wever moved for approval of funding on condition of clarification of the population served and the drug testing of youth not involved with the justice system and Shannon Hickey seconded the motion. It passed unanimously.

Diversion

Boys & Girls Clubs of Harrison-Crawford Counties

Funding is requested for a program to be operated by the Boys & Girls Club as a diversion from referral to the youth justice system for delinquent acts occurring at schools. Average score = 79.5.

Discussion:

Generally, there is support for the application. There was need demonstrated for a response to the allegations of delinquency without employing a punitive response. There is concern about net widening if there was not previously services being provided.

There is a concern that the Chief Probation Officer is indicated as the person to be hired as the Diversion Coordinator. It is not clear how he will maintain separation of his role as the CPO and the Coordinator, or how much of the Coordination role is part of his role as the CPO.

Neither the application nor the letters of endorsement indicate that collaborative service planning included the prosecutor.

On motion by Shannon Hickey and seconded by Tracy Fitz, there was a recommendation to award funding as requested, on condition that the prosecutor is in agreement and role clarification of the CPO received.

Madison County Juvenile Probation Department

Funding is requested for a program that places a Probation Resource Officer (PRO) in schools to focus on truancy and divert referrals from the justice system. An additional component is conducting activities to determine need for an assessment center. Average score = 78.5.

Discussion:

The application is well-written, includes data and a program description. However, it does not include interventions that are evidence-based or specific to address truancy. The strategies of "...soft talks; progressing to youth/parent meetings, meetings with youth/parent and school personnel; truancy agreements..." are likely or could be interventions already provided by the school. If the focus is truancy, the program should utilize an established model or curriculum that has proven effective.

The program description is detailed, but the request is for part-time administrative support with only minimal information about the need for the position. Although the request is to fund the part-time position at 100%, the budget narrative indicates the position will spend only 75% of their time on the program.

Funding is requested to provide classes through Court Services Online free to families. Although the application indicates that this entity "...provides programs that are best practices, evidence based, and research-informed", there is no information provided on the Court Services Online that supports this or demonstrates positive outcomes or effectiveness.

The recommendation was unanimous to deny funding on motion of Amber Becker and seconded by Shannon Hickey. The workgroup recommended that ICJI and the Youth Justice Team at IOCS provide technical assistance to the applicant to remedy the questions/concerns and encourage them to re-apply.

Perry Central Community School Corporation

Funding requested for Perry Central Charting Change – a project to address behaviors of students in a manner that diverts referral to the youth legal system. Average score = 78.5.

Discussion:

The application is well-written, including data to support need, clear description of the components, and goals, objectives, and outcomes. Because there is a focus on use of the Reset Room for students with special education designation, there need to be consultation with that department to ensure use of the room is part of the students' Individualized Education Plan (IEP).

On motion of Devon McDonald and seconded by Chris Biehn, the recommendation was unanimous to fully fund the application request, on condition that the program includes consultation with the special education entity regarding alignment of use of the Reset Room with students' IEP.

Reach for Youth

Funding is requested for a diversion program using restorative justice practices for offenses occurring at Avon High School. Specifically, implementation of Peer Justice Councils and Evaluation and Support Panels (ESP). Average score = 86.

Discussion:

The application lacks data specific to the problem the program is intending to solve. There is narrative about suspensions and expulsions, but no data indicating rates or raw numbers at Avon High School. The application indicates that if a mental health need is identified through the ESPs, in which the applicant is

a panel member, the youth will be referred to the applicant. This presents a potential conflict of interest. The applicant has not demonstrated good outcomes in past grant awards from ICJI and has not been responsive in addressing compliance problems. The budget request is for 43% of a current employee's salary and benefits which appears to be supplanting funds. Similarly, the request is for 9.75% of the COO's salary and benefits. The request seems to be funding current positions without seeking to change current job duties.

On motion of Judge Schein and seconded by Rachel McCaffrey, the recommendation was unanimous to deny the application for funding.

Monroe County Probation Department (Planning Grant)

Funding is requested to create a plan for expansion of diversion opportunities from the youth legal system. Average score = 75.5.

Discussion:

The application is thorough, explains phases of the work and activities and deliverables for each. Data was provided to support the need to assess diversion options.

On motion of Amber Becker and seconded by Judge Schein, the recommendation was unanimous to approve the application for funding.

Behavioral Health Pilot Programs

CEASe of Scott County

Funding is requested to provide mental health and substance abuse treatment services at no cost to youth and families and to fund a peer support position. Average score = 64.5.

Discussion:

The application included data to support the need. It is not clear how outcome #3 aligns with the goal of the program. The narrative indicates funding to support services for both "at-risk" youth and those who are system-involved. This requires clarification, as there is a funding source for those who are system-involved. The MRT curricula needs to be identified to determine if agency certification requirements are being met, specifically for substance use treatment.

On motion of Amber Becker and seconded by Tracy Fitz, the recommendation was unanimous to approve funding for the requested amount on condition that these funds are restricted to utilization as the payor of last resort.

Children and Family Services Corporation

Funding is requested to support Grasshopper Group to expand services in Knox and Daviess counties. Average score = 42.5.

Discussion:

The application is not clear. While throughout, it references expansion of services, there is also a component to conduct an assessment to understand the need to expand services. There is a goal to increase service accessibility, but it is not clear how this will occur by supplanting or supplementing salaries of existing staff. Specifically, the application states that "The team of clinicians already exists at

Grasshopper Group..." which raises the question about the need for funding for those already doing the work. Similarly, seeking funding for overhead costs of existing office space appears to be supplanting available funds. The applicant is a Medicaid provider, accepts private insurance and cash payments. The amount of funding requested and the % of salaries it represents is excessive to "fund the managerial aspects of the award". The budget narrative does not match the budget request and the amount of funding requested in the Project Information is one-half what is indicated in the budget.

On motion by Amber Becker and seconded by Tracy Fitz, the recommendation was unanimous to deny funding as requested in the application.

Clark County Probation

Funding is requested to provide behavioral health services, including competency evaluations, psychological evaluations, case management and therapy services to youth while in detention and who are released from secure detention until services can be paid for by insurance. Average score = 84.5.

Discussion:

The application indicates youth in secure detention currently receive behavioral health treatment, yet funding is being sought to provide some of these same services. The provider has a contract with DCS to provide services and Medicaid is typically restored retroactively. The objective does not define recidivism or indicate a time-limit for measurement. The application states that all youth will undergo IQ testing which may be unnecessary if this has been conducted through school or other agency. There is no detail provided about how the \$100,000 amount was determined – what services for how many at what rate. No letters of endorsement or a sustainability plan were provided.

On motion by Amber Becker and seconded by Rachel McCaffrey, the recommendation was unanimous to deny funding as requested in the application.

Johnson Circuit Court

Funding is requested to provide training to expand Indiana's pool of certified practitioners in TBRI® and to provide mental health services to up to 40 youth who are system-involved. Average score = 83.

Discussion:

The application was clear and thorough regarding the TBRI® training. It is appreciated that Johnson County seeks statewide impact. Regarding the services to be provided by RFY, it is not clear why an agency without a DCS contract is being utilized for services that have a payor source. There was information provided indicating there are only two DCS-contracted service providers in Johnson County, but not clear if RFY is seeking a contract or will they be serving youth who should be provided services through an existing funding source. Due to previous concerns with responsiveness and compliance with ICJI grants, it is recommended that invoices detail services provided, hours, and rates rather than funds dispersed on a quarterly basis for a standard amount.

On motion of Amber Becker and seconded by Rachel McCaffrey, the recommendation was unanimous to approve funding for the requested amount including a provision of technical assistance related to disbursement of funds by Johnson Circuit Court to Reach for Youth.

Lake County Juvenile Center

Funding is requested for a psychiatrist to serve youth who are securely detained as well as those participating in the Juvenile Mental Health Court. Average score = 66.5.

Discussion:

Efforts to fund psychiatric services are applauded. It is not clear if funds are supplanting a current source, as the application indicates that Dr. Curtis is or has been providing services to youth in detention. It is not clear how service provision in the detention facility will reduce length of stay or recidivism.

Similar to the applicant's community-based alternatives to detention request, it is not clear if funds for the Grant Assistant are supplanting or supplementing their salary. The dollar amounts are not consistent, as this grant indicates that their annual salary is \$10,000 and the request is to pay that full amount, meaning their full-time job duties are devoted to this grant.

On motion of Amber Becker and seconded by Shannon Hickey, the recommendation was unanimous to defer funding pending clarification of the funding request for the grant assistant and supplanting a current source used to pay Dr. Curtis for their work with youth in the detention center.

Marion Superior Court Probation Department

Funding request for staff and operating expenses to open a respite/assessment center with four beds in an Emergency Shelter Care program. Average score = 65.

Discussion:

The application is clearly written and supports need for the center. The large amount is somewhat a risk, given no committed plan for the county or other entity to absorb costs after the initial investment of these grant funds. The request to include membership fees and travel and registration costs for a conference are excessive considering the overall request.

The application includes a contradiction – the Project Summary states that there is a plan for four long-term beds and that the licensing process through DCS would begin in December 2024, but further into the application it states, "There are no current plans to seek contract with DCS..."

The outcome measures are not clear. For example, having a "...decrease in juvenile justice system involvement" is not defined nor is it clear from what a 10% decrease is being compared.

The budget is incorrect, specifically the calculation of benefit costs are more than the salary for the FYI Specialists and are 77% of the salary for the Supervisor. Correction of this may reduce the overall request significantly.

Nancy Wever motioned to recommend funding for the application and Shannon Hickey seconded. The motion did not pass.

Judge Kenworthy motioned to defer funding on condition that a letter of support is received from the City County Council indicating willingness to consider funding following the initial investment of the grant funds and a corrected budget is received. Micheal Moore seconded. The motion passed with six members voting in agreement.

Passage of Hope, LLC

Funding is requested to provide a program including skill-building workshops, family support services and therapeutic services, including through telehealth, for youth referred from the justice and child welfare systems. Average score = 74.5.

The application indicates the primary treatment modality is Multisystemic Therapy (MST), but a funding source already exists for certification and start-up costs, with an option to seek a contract with DCS for ongoing provision of services. It is not clear if the program already exists, as the application states in some places that it is “intricately woven into the operational fabric of Passage of Hope...”, yet the timeline indicates that activities in the first months include developing program manuals and hiring and training staff. The budget does not include funding for ongoing support and training or data collection, which is a core component of MST. The equipment budget is unclear, as it appears there is a request to fully fund rentals/purchases from the grant, indicating the agency does not already have such equipment and it will only be used for this program. Additionally, the application states that none of the positions receive funds from any other sources, indicating none of the staff are currently in clinical practice. The request for utilities, etc. related to a physical space is confusing, given the statements that the clinicians reside in multiple locations across Indiana. Additionally, the physical space referenced is for the project/program, not for the agency implementing it. The application does not mention DCS funding in their sustainability program, yet that agency funds many of the services, including MST.

On motion by Amber Becker and seconded by Shannon Hickey, the recommendation was unanimous to deny funding as requested in the application.

Reach for Youth

Funding is requested to provide mental health services for youth either diverted from or involved in the justice system, primarily through telehealth. Average score = 85.5.

Discussion:

The application is thorough, yet not concise. The initial statements indicate the program will serve youth connected to the diversion program operated by the Boys & Girls Club in Marion County, but included a lot of information about justice-involved youth and those who are struggling in the school environment. Similar to the other applications from this agency, there is concern due to past performance and lack of responsiveness related to compliance issues. Also, if the intent is to serve system-involved youth, it is not clear why there is a need for grant funding, as there are DCS contracted service providers available.

On motion of Shannon Hickey and seconded by Amber Becker, the recommendation was unanimous to deny funding for this application.

Southwest School Corporation

Funding is requested to implement a care coordination program using a model developed by the Innovations Institute that is family-centered and included evidence-based interventions. Average score = 75.

Discussion:

The application is thorough and clear, although the referral process and implementation plan were not detailed. The goals, objectives, and outcomes are good, but technical assistance is needed to clarify some of them. The sustainability plan is clear. Mileage is requested at a higher rate than \$.49. There was no letter of support from the juvenile court or probation department. Collaboration with the local justice partners is essential for this effort.

On motion of Amber Becker and seconded by Tracy Fitz, the recommendation was unanimous to approve funding for the requested amount including a provision of technical assistance related to clarification of goals and confirmation of collaboration with juvenile justice stakeholders.

WORKGROUP BUSINESS

Nancy reminded the members of the next scheduled meetings to review applications and will send information about scoring responsibilities and timelines when the application cycle is determined.

ADJOURN

The meeting was adjourned at 3:00 p.m.

DRAFT