



Texas Department of Criminal Justice

Bryan Collier
Executive Director

October 8, 2024

Mr. Eric Beverly, Executive Director
Texas Sunset Advisory Commission
P.O. Box 13066
Austin, Texas 78711

Dear Mr. Beverly:

On behalf of the hard-working and dedicated men and women of the Texas Department of Criminal Justice (TDCJ), I appreciate the hard and thoughtful work of the Sunset Advisory Commission staff during the ongoing review of our agency. It is clear from the Sunset Advisory Committee Staff Report (Staff Report) that Sunset staff members assigned to that review have been able to see first-hand both the agency's growth and commitment to continuous improvement of its operations, as well as the agency's challenges for the future. I can also confirm that the TDCJ administration and staff are ready to meet these challenges head-on.

We also appreciate the opportunity to respond to the Staff Report. TDCJ is pleased to present its response in this letter and attachment entitled *TDCJ's Response to the Sunset Advisory Commission's Staff Report*.

As indicated below, TDCJ agrees with many of the recommendations in the Staff Report. This agreement by TDCJ is a reflection of the time and effort Sunset staff gave in working to understand the scope of statutory responsibilities upheld by the thousands of dedicated TDCJ staff members, the variety of rehabilitative and reentry opportunities available for individuals in custody or on community supervision, and the challenges related to continued modernization of TDCJ operations.

Again, thank you for considering the attached agency comments. We offer these comments to continue the conversation on improvements to make the agency's processes more efficient and effective. The agency is committed to this continuous improvement and development and is appreciative of the Legislature's support in these endeavors.

Sincerely,

A handwritten signature in black ink, appearing to read "Bryan Collier".

Bryan Collier
Executive Director

Our mission is to promote public safety, promote positive change in offender behavior, reintegrate offenders into society, and assist victims of crime.

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TDCJ'S RESPONSE TO THE SUNSET ADVISORY COMMISSION'S STAFF REPORT

Issue 1 – A Changing Workforce and Inmate Population Make Multiple TDCJ Facilities Almost Impossible to Adequately Staff.

1.1 Require TDCJ to create a long-term facilities and staffing plan that identifies future needs and makes recommendations to organize resources and capacity accordingly.

TDCJ agrees with this recommendation.

Through established reporting mechanisms, the agency provides the Legislature with information on its capital expenditure needs and strategic planning. To supplement this existing reporting to the Legislature and the Texas Board of Criminal Justice, TDCJ is beginning the process of implementing an internal review and plan specific to long-term facilities and capacity needs, which will specifically address, among other things, staffing capabilities at those facilities. TDCJ believes that it has the resources to develop such a plan and incorporate that plan into future budget requests made to the Legislature. TDCJ is committed to working with legislators and their staff to ensure that all relevant stakeholders are kept apprised of progress on this plan to meet TDCJ's capacity needs in the future.

Although TDCJ believes it is well-positioned with existing resources to develop this long-term facilities plan, should the Legislature desire to have external resources implemented on this initiative, the agency is open to the possibility of contracting with an external entity to assist in developing that plan. Such assistance would require additional appropriations. For example, TDCJ understands that the Florida Department of Corrections' Master Plan that was referenced in the report costs approximately \$5 million to produce.

In the meantime, TDCJ has already begun an effort to modernize and streamline operations that will assist in future facilities and staffing analysis. This includes removing historically vacant low-paying positions that could not be filled and utilizing that salary difference to increase the pay structure of critical staff filling those key roles. In addition, the ongoing implementation of new technology, such as the installation of security fencing technology at various units throughout the state, has already resulted in the reduced need for security staff at units by over 100 full-time security staff positions. Upon project completion, this initiative will eliminate over 500 full-time security staff positions. TDCJ is committed to further modernization of its operations, which can and should assist in addressing staffing needs and costs.

TDCJ also very much appreciates the Legislature's ongoing commitment to supporting the hard-working and dedicated men and women on TDCJ units in a manner that has and will support recruiting and retention efforts. TDCJ's Legislative Appropriations Request exceptional item request for additional pay raises for correctional staff underscores TDCJ's continued pursuit of equitable pay for our dedicated state employees and providing a competitive salary for future recruitment.

1.2 Require TDCJ to develop a phased plan to close facilities with persistent staffing challenges.

TDCJ agrees with this recommendation.

Over time, TDCJ has taken action to close or idle beds within active facilities, close or idle entire facilities, and recently reopen facilities to keep pace with fluctuating inmate populations. These decisions were based on various factors, including staffing levels, maintenance needs, and capacity needs. Recent projections by the Legislative Budget Board indicate that the agency will need additional capacity to meet future capacity needs. Should the legislature fund the 10-year plan required in Recommendation 1.1, the information could be used to inform this additional report.

The long-term facilities and staffing plan discussed in Recommendation 1.1 will include consideration of all units within the system, taking into account staffing levels and capabilities to staff units in all areas of the State in which TDCJ operates, as well as increasing inmate population demands.

1.3 Eliminate the requirement for TDCJ to maintain state jails in nine regions from statute.

TDCJ agrees with this recommendation.

1.4 Eliminate unit maximum capacities from statute.

TDCJ agrees with this recommendation.

TDCJ seeks clarification on whether the recommendation would eliminate only Government Code 499.101 or, if implemented, the recommendation would include repealing the entirety of Subchapter E, allowing TDCJ to govern capacity by rule enacted by the Texas Board of Criminal Justice. Subchapter E, as currently established, requires coordination and input not only from the Board but also from various TDCJ staff, TDCJ inmates, the Office of the Governor, and the Office of the Attorney General. These reviews can result in a cumbersome process that has the potential to delay needed changes in capacity. Eliminating the chapter in its entirety and thus streamlining the process to place decision-making at TDCJ and the Texas Board of Criminal Justice, which by statute governs TDCJ's operations, would create a more efficient process to address capacity needs across the system.

Issue 2 – TDCJ's Policies and Practices Contribute to and Inadequately Address Its Staffing Crisis.

2.1 Direct TDCJ to consolidate and expand its existing workforce retention and support functions under one department to better support employees and systematically identify root causes of turnover.

TDCJ agrees with this recommendation.

TDCJ is in the process of initiating organizational changes to accomplish the recommended consolidation and expansion of workforce retention and support functions. In addition, part of TDCJ's exceptional item for Staff Retention Initiatives contains employee support functions (\$2.5 million) that would be utilized to better support employees.

2.2 Direct TDCJ to conduct job task analyses for key roles, clarify task prioritization, and tailor evaluations, hiring objectives, and training materials as needed.

TDCJ agrees with this recommendation.

TDCJ is in the process, as indicated in response to Recommendation 2.1, of initiating organizational changes that will assist in implementing improved workforce evaluation and clarification of roles and prioritization of job responsibilities, as well as associated continuous improvements in training.

2.3 Direct TDCJ to provide additional guidance in policy on the appropriate use of disciplinary and corrective actions for both subordinates and supervisors.

TDCJ agrees with this recommendation.

The agency is nearing completion of a revision of its employee disciplinary policy, which will be presented to the Texas Board of Criminal Justice for review later this year.

2.4 Direct TDCJ to clarify and streamline its process for employees to file formal workplace issues and consider creating an avenue for anonymous complaints.

TDCJ agrees with this recommendation.

As indicated in response to Recommendation 2.1, TDCJ is initiating organizational changes to help implement an improved process for employees to raise workplace issues and complaints.

2.5 Direct TDCJ to revise and expand the scope of its performance evaluation process.

TDCJ agrees with this recommendation.

As indicated in response to Recommendation 2.1, TDCJ is initiating organizational changes that will assist in implementing improved workforce evaluation.

2.6 Direct TDCJ to strengthen policies and processes for employees to seek out, participate in, and track trainings as a path to advancement within the agency.

TDCJ agrees with this recommendation.

TDCJ is in the process, as indicated in response to Recommendation 2.1, of initiating organizational changes that will assist in continuous improvements in training and professional development. This recommendation is aligned with the agency's appropriations request for a new learning management system to enhance the agency's ability to provide and track employee training, which totals \$4.1 million.

2.7 Direct TDCJ to update and standardize its telework policy.

TDCJ agrees with this recommendation.

TDCJ is in the process, as indicated in response to Recommendation 2.1, of initiating organizational changes that will assist in standardizing all employment policies, including policies related to telework.

2.8 Direct TDCJ to more consistently collect and analyze feedback from both current and separating staff.

TDCJ agrees with this recommendation.

TDCJ is in the process, as indicated in response to Recommendation 2.1, of initiating organizational changes that will assist in implementing an improved process for receiving and acting on employee feedback.

Issue 3 - Uncoordinated Strategic Planning and Outdated Data Systems and Practices Hinder TDCJ from Effectively Modernizing to Address Technology and Staffing Challenges.

3.1 Direct TDCJ to establish an office of modernization and strategic initiatives.

TDCJ agrees with this recommendation.

TDCJ is in the process of initiating organizational changes to establish such an office.

3.2 Direct TDCJ to develop a plan to prioritize improving its data collection and analysis, focusing on correctional and parole functions.

TDCJ agrees with this recommendation.

In conjunction with the review of duties of certain positions captured in Recommendation 2.2 and the development of the office as discussed in Recommendation 3.1, the agency will continue its efforts to evaluate the modernization of work practices, including through the use of technology.

3.3 Direct TDCJ to establish and maintain a report that enables users to view an array of indicators on prison health and safety.

TDCJ agrees with this recommendation.

The agency has developed a beta version of a dashboard that captures an array of data points relevant to the recommendation and is working towards implementation of the dashboard in 2025.

3.4 Direct TDCJ to establish administrative directives for the data governance program plan established by the Data Management Office.

TDCJ agrees with this recommendation.

The agency will establish such administrative directives.

3.5 Direct TDCJ to develop a written plan to phase out paper-based processes, reduce manual data processes, and identify opportunities for automation.

TDCJ agrees with this recommendation.

In conjunction with the review of duties of certain positions captured in Recommendation 2.2 and the development of the office as discussed in Recommendation 3.1, the agency will continue its efforts to evaluate the modernization of work practices, including through the use of technology.

3.6 Direct TDCJ to evaluate its process for reviewing external research requests.

TDCJ is neutral on this recommendation as drafted.

TDCJ values its ongoing relationships with research partners in the State, including several of the State's outstanding institutions of higher learning. At the same time, as one of the largest criminal justice agencies in the United States, the TDCJ receives interest from many researchers nationwide and even outside the United States. The TDCJ has processes in place to review requests, including those coming from organizations that operate outside of Texas and abroad. However, TDCJ believes that it should and must have the ability to determine that some of these requests are duplicative, lack value for the agency, or significantly strain operational resources. While the agency intends to strengthen its review process for external research requests, it is unclear if these changes will impact the outcome of the review of such requests. Regarding the Staff Report's discussion on the use of an institutional review board (IRB), TDCJ's outreach to Washington State's Department of Corrections confirms they do not have their own IRB but rather use Washington State's Department of Health Services' IRB as needed. TDCJ is currently able to similarly leverage in-state IRBs as needed.

Issue 4 - The State Lacks Sufficient Oversight and Strategic Planning for Inmate Rehabilitation Programs.

4.1 Require TDCJ to comprehensively inventory rehabilitation and reentry programs, conduct biennial program evaluations, and recommend changes to programs when needed.

TDCJ agrees with the recommendation in part, with the need for additional clarification and coordination with the Board of Pardons and Paroles.

TDCJ understands the importance of providing quality programming and the impact this has on the lives of individuals within the criminal justice system, which serves the goal of making Texas a safer place to live. The Board of Pardons and Paroles (BPP) has numerous options to choose from when making release decisions. Every two years, the agency conducts an evaluation of those programs and provides the legislature with a recidivism study. In large part because of the success of programs, the recidivism rate has dropped 35% since FY 2009.

TDCJ believes in maintaining a robust catalog of intensive agency and peer-led programs that are not designed to supplant BPP-voted release programs but instead improve individuals' future trajectories while they are incarcerated or released. The agency has more than 27,000 volunteers from communities across Texas who donate hundreds of thousands of hours each year to change the lives of convicted inmates while aiding and comforting their victims. Faith-based groups facilitate many of these activities. Support for these volunteer efforts is essential to achieving TDCJ's statutory mission directives.

The Staff Report recommends separating programs into two categories—those claiming rehabilitative or reentry effects and, therefore, subject to program evaluation and those non-evidence-based/informed programs that are not subject to evaluation. The TDCJ believes that most, if not all, programs and activities, including those facilitated by our faith-based volunteers, are intended to have a rehabilitative or reentry effect. Evaluating the impact on one's moral compass is, by the nature of the programming, difficult to quantify with specificity or through metrics. For example, many inmates do not just participate in one peer-led or volunteer activity while incarcerated, making evaluating the effects of such a specific program challenging.

At the same time, TDCJ agrees with the Staff Report to the extent that it recommends continuous improvement in the supervision and monitoring of rehabilitative programs. Among other things, TDCJ is initiating organizational changes that would create a new division within the agency, the Chaplaincy and Volunteer Division, which would oversee activities led by outside volunteers, faith-based organizations, and peer inmates that are not listed on a person's Individualized Treatment Program (ITP). The agency believes that these activities, despite having significant rehabilitative or reentry effects, should not be subject to the same evaluation process as those listed on the ITP. This new division will develop processes to track these activities so that their participation is cataloged.

4.2 Require TDCJ to develop a strategic plan for rehabilitation and reentry programs in conjunction with Windham and report on implementation status biennially.

TDCJ agrees with the recommendation in part, with the need for additional clarification and coordination with the Windham School District and defers to the Legislature on existing resources.

TDCJ believes the agency should prioritize placing inmates appropriately and expeditiously into BPP-voted release programs. Reducing the current time periods associated with inmate placement into such programs by half is an ambitious goal that may require program expansion, which in turn would be contingent on legislative appropriations.

The Staff Report cites Windham School District's CHANGES program as a potential model for other BPP-voted release programs. The program is available in most facilities, and the large footprint of this program does not often necessitate the logistical challenge of moving a person to another facility. In contrast, specialized substance use and sex offender treatment programs are not in each facility and have more stringent and specialized qualifications for instructors.

The Staff Report also acknowledges correctly that some program placements are delayed based on extenuating circumstances such as bench warrants, temporary medical restrictions, or enrollments in college or career or technical courses. While TDCJ is committed to continuous improvement in documentation within the agency's program placement data, as acknowledged in the Staff Report there are placement factors beyond the TDCJ's control.

The report points to two distinct areas that should be reduced and eliminated: the "program buffer" imposed by the BPP and the "program placement delays" by TDCJ. To fully accomplish these goals, program expansion would need to take place to reduce the logistical challenge of moving inmates to different facilities across the state. The fiscal impact would depend on the level of program expansion necessary.

4.3 Require TDCJ to track parole-voted program voting data and use these data to inform strategic program planning.

TDCJ agrees with this recommendation.

TDCJ will include such tracking as it implements the continuous improvement efforts discussed in response to Recommendation 4.1.

4.4 Require TDCJ to prioritize parole-voted program decisions.

TDCJ agrees with this recommendation.

TDCJ currently prioritizes placement into BPP-voted release programs. The fiscal impact of ensuring that the expansion of those programs meets capacity needs would depend on the level of program expansion necessary.

4.5 Require TDCJ, BPP, and Windham to collaborate in developing evidence-based ITP and parole-voted program criteria and to develop and maintain associated program lists.

TDCJ agrees with this recommendation.

TDCJ will collaborate with BPP and Windham in this effort.

4.6 Require TDCJ to revise the ITP to include a comprehensive, plain language list of program participation information with clear distinctions between evidence-based and non-evidence-based program participation.

TDCJ agrees with the recommendation in part, with the need for additional clarification and coordination with the Board of Pardons and Paroles.

TDCJ incorporates its response to Recommendation 4.1 regarding the delineation of evidence-based and non-evidence-based programs. Participation in non-intensive volunteer and peer-led activities is generally not required and is, therefore, not on an inmate's ITP. However, TDCJ is committed to working with BPP to clarify the types of participation in programming that the BPP will consider as part of its process in a manner

that could incentivize more members of TDCJ's populations to engage in programming that TDCJ believes has merit in rehabilitation and reentry efforts. TDCJ is also committed to tracking inmate participation in programs that fall within and outside an inmate's ITP.

4.7 Remove volunteer and faith-based program reporting requirement for wardens.

TDCJ agrees with this recommendation.

This tracking and reporting would be within the responsibility of the Chaplaincy and Volunteer Division as discussed in response to Recommendation 4.1.

4.8 Require TDCJ staff responsible for rehabilitation and reentry programs and services to report on volunteer and faith-based program data and ensure volunteer and faith-based programming needs are met at each facility.

TDCJ agrees with this recommendation.

As noted in the agency's response to Recommendation 4.1, TDCJ intends to create a new division within the agency, the Chaplaincy and Volunteer Division, which will oversee activities led by outside volunteers, faith-based organizations, and peer inmates that are not listed on a person's Individualized Treatment Program (ITP). The division will evaluate the needs at each facility to determine if needs are being met. The agency believes this division would be most appropriate to oversee, track, and report on this information which could be incorporated into the report required by Recommendation 4.1.

4.9 Direct TDCJ to merge the Rehabilitation Programs Division and the Reentry and Integration Division.

TDCJ agrees with this recommendation.

TDCJ is initiating organizational changes to meet this recommendation.

4.10 Direct BPP to make parole-voted program decisions independent of TDCJ program placement practices.

TDCJ defers to the Legislature on this recommendation.

TDCJ has no authority to impose policy decisions on the BPP. Should the BPP decide to remove any consideration of reasonable logistical movements, it will have implications for the mandate in Recommendation 4.2 and potentially necessitate additional legislative appropriations. The fiscal impact would be dependent on the level of program expansion necessary.

4.11 Direct TDCJ to develop volunteer program assessment criteria and regular monitoring and assessment policies to ensure sufficient volunteer program oversight and strategic use of volunteer resources.

TDCJ agrees with this recommendation.

The Chaplaincy and Volunteer Division would be responsible for developing criteria and assessing activities led by outside volunteers, faith-based organizations, and peer inmates not listed on a person's ITP.

4.12 Modify language in the General Appropriations Act to direct TDCJ to transfer administration and management of post-secondary correctional education to Windham through a memorandum of understanding.

TDCJ agrees with this recommendation.

TDCJ will implement this change if the recommendation is adopted by the Legislature through the General Appropriations Act.

Issue 5 – Critical Statutory and Structural Deficiencies Strain an Already Overextended Parole System, Creating Unnecessary Barriers to Effective Supervision.

5.1 Abolish the PO salary career ladder and require TDCJ to establish it in rule.

TDCJ agrees with this recommendation.

TDCJ will implement this change if the recommendation is adopted by the Legislature.

5.2 Abolish statutory maximum parole caseload ratios and require TDCJ to establish them in rule.

TDCJ agrees with this recommendation.

TDCJ will implement this change if the recommendation is adopted by the Legislature.

5.3 Require TDCJ and BPP to evaluate post-release special conditions that may be temporarily modified by POs and require TDCJ and BPP to establish corresponding modification processes in rule.

TDCJ defers to the Legislature on this recommendation, with the need for additional clarification and coordination with the Board of Pardons and Paroles.

TDCJ stands ready to discuss with the Legislature and the BPP potential changes to the existing post-release special conditions structure.

5.4 Prohibit the Parole Division from making recommendations of additional special conditions prior to release.

TDCJ agrees with this recommendation.

The agency and the BPP are currently coordinating the implementation of this recommendation.

5.5 Direct the Parole Division to report supervision trends and workload impacts of supervision conditions to BPP annually.

TDCJ agrees with this recommendation.

TDCJ will coordinate with the BPP on the implementation of this recommendation.

Issue 6 – BPP Does Not Ensure Its Decision-Making Processes are Fair, Consistent, Transparent, and Data-Informed.

6.1 Require BPP to report outcomes by panel for release decisions, special conditions, and revocations and incorporate the findings into training for voters and staff.

As this is a recommendation specific to the BPP's operations, TDCJ is neutral on it.

TDCJ will continue to coordinate with BPP regardless of the outcome of the recommendation.

6.2 Require BPP to provide training for MRIS voters.

As this is a recommendation specific to the BPP's operations, TDCJ is neutral on it.

TDCJ will continue to coordinate with BPP regardless of the outcome of the recommendation.

6.3 Require BPP to establish a process in rule for assessments of an inmate's prognosis for MRIS cases.

As this is a recommendation specific to the BPP's operations, TDCJ is neutral on it.

TDCJ will continue to coordinate with BPP regardless of the outcome of the recommendation.

6.4 Require BPP to establish in rule the factors considered in MRIS decisions.

As this is a recommendation specific to the BPP's operations, TDCJ is neutral on it.

TDCJ will continue to coordinate with BPP regardless of the outcome of the recommendation.

6.5 Require BPP and TDCJ's Parole Division to create a special conditions working group consisting of voters and Parole Division staff representatives.

TDCJ agrees with this recommendation.

TDCJ will coordinate with BPP to implement such a working group.

6.6 Direct BPP to develop formal and detailed internal processes to address variations from parole guidelines.

As this is a recommendation specific to the BPP's operations, TDCJ is neutral on it.

TDCJ will continue to coordinate with BPP regardless of the outcome of the recommendation.

6.7 Direct the agency to review its IPO interview procedures and take action to increase effectiveness and consistency.

As this is a recommendation specific to the BPP's operations, TDCJ is neutral on it.

TDCJ will continue to coordinate with BPP regardless of the outcome of the recommendation.

6.8 Direct the agency to review its case summary preparation processes and take action to address inefficiencies.

As this is a recommendation specific to the BPP's operations, TDCJ is neutral on it.

TDCJ will continue to coordinate with BPP regardless of the outcome of the recommendation.

6.9 Direct BPP to work with TCOOMMI to establish a method to videoconference with an inmate who qualifies for MRIS due to a medical condition.

TDCJ agrees with this recommendation.

TDCJ will coordinate with TCOOMMI to implement this recommendation.

6.10 Direct BPP to identify and address barriers to completing noncapital clemency applications and post relevant guidance on its website.

As this is a recommendation specific to the BPP's operations, TDCJ is neutral on it.

TDCJ will continue to coordinate with BPP regardless of the outcome of the recommendation.

Issue 7 – The State Has a Continuing Need for the Texas Department of Criminal Justice.

7.1 Continue the Texas Department of Criminal Justice and Texas Board of Criminal Justice for 12 years.

TDCJ agrees with this recommendation.

TDCJ appreciates the Staff Report's recognition of the vital role that TDCJ and its dedicated men and women play in public safety, promoting positive change in inmate behavior, reintegrating qualified inmates into society, and assisting victims of crime.

7.2 Direct TDCJ to eliminate the Private Facility Contract Monitoring and Oversight Division and reallocate existing resources elsewhere within the agency.

TDCJ agrees with this recommendation.

TDCJ is initiating organizational changes to implement this recommendation.

Issue 8 – Texas Criminal Justice Entities' Statutes and Processes Do Not Reflect Some Standard Elements of Sunset Reviews.

8.1 Update for the committee the standard across-the-board requirement regarding grounds for removal of a board member.

TDCJ agrees with this recommendation.

TDCJ will work with the Correctional Managed Health Care Committee (CMHCC) to implement this recommendation.

8.2 Update for TDCJ, BPP, and the committee the standard across-the-board requirement related to board member training.

TDCJ agrees with this recommendation.

TDCJ will work with the CMHCC to implement this recommendation.

8.3 Update for BPP the standard across-the-board requirement related to developing and maintaining a complaints system and making information on complaint procedures available to the public.

As this is a recommendation specific to the BPP's operations, TDCJ is neutral on it.

TDCJ will continue to coordinate with BPP regardless of the outcome of the recommendation.

8.4 Abolish three of TDCJ's reports, adjust the deadlines for three others, and continue all other reporting requirements for TDCJ, the committee, Windham, and BPP.

TDCJ agrees with this recommendation.

If the Legislature adopts the recommendation, TDCJ will implement the changes in its existing reporting structure.

8.5 Continue the Judicial Advisory Council and the TCOOMMI advisory committee.

TDCJ agrees with this recommendation.

TDCJ appreciates the Staff Report's recognition of the important roles that the Judicial Advisory Council and the TCOOMMI advisory committee play, respectively, in helping to coordinate the activities of Community Supervision and Corrections Departments across the State and addressing mental health issues that have a major impact on the State, including in TDCJ's operations.

8.6 Remove the Advisory Committee on Agriculture from statute.

TDCJ defers to the Legislature on this recommendation and will comply with the Legislature's direction on this issue.

Should the Advisory Committee on Agriculture be removed from statute, TDCJ will work with the Texas Board of Criminal Justice on a board committee structure that will ensure that TDCJ is receiving appropriate input from stakeholders in TDCJ's agricultural operations.

8.7 Update TDCJ's statute to reflect the requirements of the person-first respectful language initiative.

TDCJ agrees with this recommendation.

8.8 Direct Windham to adopt a rule review plan.

As this is a recommendation specific to the operations of the Windham School District, TDCJ is neutral on it.