



Leicester
City Council

FORWARD TIMETABLE OF CONSULTATION AND MEETINGS:

Cabinet	12.07.10
Full Council	16.09.10

Future Commissioning of Criminal Justice Drug Treatment Provision – Incoming Responsibilities

1. Purpose of Report

- 1.1 The purpose of this report is to outline the decisions and actions required to facilitate the successful implementation of the proposed commissioning arrangements for Criminal Justice drug treatment provision across Leicester, Leicestershire and Rutland communities and in HMP Leicester from financial year 2011/12.

2. Summary

- 2.1 This report summarises the new commissioning arrangements agreed at the Public Service Board in April 2010 as follows;

- Joint commissioning across the sub-region for community Criminal Justice drug treatment services
- Joint commissioning of drug treatment services across community and custody to include existing community Criminal Justice drug treatment services and Counselling, Assessment, Referral, Advice and Throughcare (CARATs) and Integrated Drug Treatment System (IDTS) services within HMP Leicester.

The intention under the new arrangements would be to commission a single fully Integrated criminal justice treatment service across the sub-region and across the community/custody boundary.

- 2.2 The report also summarises the decisions to be made by Cabinet to facilitate these arrangements as follows;

- Cabinet approval of Leicester City Council taking on the responsibility as procuring agent and budget holder for the Criminal Justice element of the Adult Pooled Treatment Budget on behalf of Leicestershire and Rutland – this will involve host commissioning arrangements via a Section 75 agreement with Leicestershire County and Rutland Primary Care Trust.
- Cabinet approval of Leicester City Council taking on the responsibility as procuring agent and budget holder for the Drug Intervention Programme Main Grant on behalf of Leicestershire and Rutland – this will host commissioning arrangements via a Section 101 agreement with Leicestershire County Council and Rutland County Council.

- Cabinet approval of Leicester City Council taking on the responsibility as procuring agent and budget holder for National Offender Management Service (NOMS) CARATS funding for HMP Leicester – this will involve LCC providing commissioning and budget management services to NOMS for the deployment of these funds via a contract with the Ministry of Justice.

3. Recommendations

3.1 That Cabinet Members;

- a) Endorse the proposed commissioning approach.
- b) Agree to all required incoming responsibilities as detailed in 2.2

4. Report

4.1 Total Place indicated that where there are opportunities to jointly commission or procure services sub-regionally this should be considered and where appropriate pursued. It has been identified that commissioning of Criminal Justice drug treatment services across Leicester, Leicestershire and Rutland provides such an opportunity.

4.2 Current commissioners of these drug services have worked collaboratively to develop proposals for a joint commissioning model that will provide a platform for more efficient use of resources, and more effective delivery at every stage of the commissioning process. A model that will result in the optimum Criminal Justice treatment system and aims to deliver improved outcomes for individual service users and communities. These proposals were endorsed initially by the System Change Project Board and then via the Safer Leicester Partnership Drug and Alcohol Delivery Group, County Drug and Alcohol Action Team Board and Prison Partnership Board for HMP Leicester before receiving subsequent endorsement by Chief Executives at the Public Service Board in April 2010.

4.3 Appendix 1 provides a background to the development of the commissioning proposals and provides further details as to the arrangements and anticipated benefits. In summary the proposals have two key elements;

- Joint commissioning across the sub-region for community Criminal Justice drug treatment services
- Joint commissioning of drug treatment services across community and custody to include existing community Criminal Justice drug treatment services and Counselling, Assessment, Referral, Advice and Throughcare (CARATs) and Integrated Drug Treatment System (IDTS) services within HMP Leicester.

4.4 The two major benefits of the proposed commissioning model are that a) it will support the commissioning of an integrated service delivery model and b) it represents a more streamlined and efficient commissioning approach.

The key features of the commissioning model are;

- A single banking arrangement hosted by Leicester City Council. Agreement has also been gained from Central Government to receive a single sub-regional allocation for the DIP Main Grant thus reducing administrative burden and streamlining the funding delivery chain. Individual allocations for each

area would continue to be identified within this single sum to ensure that appropriate funds are spent across localities.

- A single contract held by Leicester City Council with Leicestershire County Council, Rutland County Council and Leicestershire County and Rutland Primary Care Trust as parties to the contract. This contract would be contract managed through a sub-regional strategic commissioning board and at a lower level via contract management meetings with sub-regional representation.
- Commissioning would be undertaken via a sub-regional criminal justice strategic commissioning group that will operate as a distinct part of the Safer Leicester Partnership Strategic Commissioning Board. The added benefit of this group is that it could encompass a sub-regional focus on all strategic developments relevant to criminal justice drug treatment alongside relevant safeguarding issues.

4.5 The new commissioning arrangements will be underpinned by a 'suite' of partnership agreements between partners and will require, via these arrangements, the following actions;

- Cabinet approval of Leicester City Council taking on the responsibility as procuring agent and budget holder for the Criminal Justice element of the Adult Pooled Treatment Budget on behalf of Leicestershire and Rutland – this will involve host commissioning arrangements via a Section 75 agreement with Leicestershire County and Rutland Primary Care Trust.
- Cabinet approval of Leicester City Council taking on the responsibility as procuring agent and budget holder for the Drug Intervention Programme Main Grant on behalf of Leicestershire and Rutland – this will host commissioning arrangements via a Section 101 agreement with Leicestershire County Council and Rutland County Council.
- Cabinet approval of Leicester City Council taking on the responsibility as procuring agent and budget holder for National Offender Management Service (NOMS) CARATS funding for HMP Leicester – this will involve LCC providing commissioning and budget management services to NOMS for the deployment of these funds via a contract with the Ministry of Justice.

The procurement activity to be undertaken as part of these arrangements will sit within the wider procurement activity being undertaken within the City DAAT as part of their service redesign process. The DAAT intend to utilise internal resources to undertake this activity and have a sub-regional resource (LLR Criminal Justice Lead post) to draw on to ensure that the necessary time and effort can be put into the exercise without causing additional burden to City staff.

As part of the development of the partnership agreements and subsequent tendering exercise it will be necessary to ensure that appropriate 'break' measures are put into place should significant changes occur to the financial grants involved under the arrangements.

5 Financial, Legal and Other Implications

5.1 Financial Implications

5.1.1 Criminal Justice drug treatment provision is funded entirely through grants. The following bodies receive Criminal Justice drug treatment grants which will be pooled under the proposed commissioning arrangements:

Funding Stream	Funding Source	2010/11 Allocation £	%
Adult Pooled Treatment Budget(City)	DoH	764,533	22.56%
DIP Main Grant (City)	Home Office	1,419,170	41.87%
Adult Pooled Treatment Budget (County & Rutland)	DoH	502,365	14.82%
DIP Main Grant (Rutland)	Home office	6,045	0.18%
DIP Main Grant (County)	Home office	432,002	12.75%
CARATs (HMP Leicester)	Ministry of Justice	201,761	5.95%
CBDT (HMP Leicester)	Ministry of justice	63,208	1.87%
Total		3,389,084	100.00%

5.1.2 Leicester City Council as the lead commissioner will be responsible for spending these monies. The joint commissioning group would ensure partners are involved in commissioning.

5.1.3 The amounts listed above are 2010/11 allocations as 2011/12 allocations are not yet known. Spending plans will be based on anticipated budgets for 2011/12. Should there be any cuts in funding; expenditure would have to be reduced accordingly.

5.1.4 In the event of any overspends, overspend will be ring fenced and taken forward to the next financial year where it will be taken off the total amount available for commissioning. Should the joint commissioning group not decide to take this path overspend will be shared out amongst the partners according to percentage contributions. Overspends should not occur as the commissioning costs would be known in advance.

5.1.5 Underspends will be ring-fenced and carried forward so that they are available for the following years commissioning. Risk sharing agreements will form part of the agreements with all involved parties.

5.1.6 As the procuring agent the City Council will take on budget management responsibilities. Any additional costs arising from this will be paid for from the pooled commissioning budget.

5.2 Legal Implications

5.2.1 There are three agreements underpinning these proposals;

- Section 75 arrangement utilising the pooled budget and lead commissioning flexibilities in respect of the Leicestershire and Rutland PCT's criminal justice element of the pooled treatment budget for substance misuse and rehabilitation facilities and services.

Leicester City Council to be Lead Commissioner and pooled budget manager for this element.

- A delegation arrangement under section 101 of the Local Government Act 1972 under which Leicestershire County Council delegates to Leicester City Council lead commissioning and budget management functions in respect of DIP main grant.

Leicestershire County Council will need to confirm to us the legal powers underpinning these functions.

For simplicity this delegation will exclude the short term run on arrangement under an existing contract.

- Finally there will be a contract for services between Leicester City Council and NOMS (an executive agency of the Ministry of Justice) under which Leicester City Council will provide commissioning, contract and budget management services in respect of the procurement and provision of counselling, assessment, referral, advice and throughcare for the benefit of substance users within HMP Leicester. The Council's powers to do this are under S2 of the Local Government Act 2000 and Section 111 of the Local government Act 1972.

- 5.2.2 In using "well being" powers under Section 2 Local Government Act 2000 the Council has to have regard to its sustainable community strategy. Also any recovery of costs etc is limited to actual costs.
- 5.2.3 NOMS require flexible termination and change provisions and these will need to be stepped down into the proposed sub contracts.
- 5.2.4 This contract will depend on successful procurement of subcontractors.
- 5.2.5 No staff are envisaged to transfer under TUPE except at provider (sub contract) level where this will be addressed through the procurement process.
- 5.2.6 No co-location is proposed so there are no property agreements required
- 5.2.7 There is a framework agreed with Risk Management Services for responsibilities and required insurances for clinical negligence (and clinical functions) for use in "section 75 arrangements" and further discussion with RMS will be needed once the proposed specification of the NOMS service is available
- 5.2.8 Care will be taken in procurement to include as robust a break position as possible in case headline funding is recalled. This may however not be attractive for providers.
- 5.2.9 An overarching "memorandum of understanding" is proposed between all members of the System Change proposals. Although of no legal effect it will set out the parties intentions as a "partnership".

6. Other Implications

OTHER IMPLICATIONS	YES/NO	Paragraph references within the report
Equal Opportunities	No	
Policy	No	
Sustainable and Environmental	No	
Crime and Disorder	Yes	Throughout report
Human Rights Act	No	
Elderly/People on Low Income	No	
Corporate Parenting	No	
Health Inequalities Impact	Yes	Appendix 4.4

7. Risk Assessment Matrix

7.1 This only needs to be included if appropriate with regard to the Council's Risk Management Strategy

Risk	Likelihood L/M/H	Severity Impact L/M/H	Control Actions (if necessary/appropriate)
Financial – overspend of pooled budget	L	H	Risk sharing agreement between partners; effective management of pooled budget through joint commissioning group
2			
3			
4			
5			
6 etc			

L – Low
M – Medium
H – High

L – Low
M – Medium
H – High

Climate Change Implications

This report does not contain any significant climate change implications and therefore should not have a detrimental effect on the Council's climate change targets.
Helen Lansdown, Senior Environmental Consultant - Sustainable Procurement

8. Background Papers – Local Government Act 1972

9. Consultations

10. Report

Charlotte Talbott, System Change Project Manager, Safer Leicester Partnership.

11. Appendix

Appendix A provides background to the System Change Project and provides further detail as to the proposed commissioning arrangements and anticipated benefits.

Key Decision	Yes
Reason	Is significant in terms of its effect on communities living or working in an area comprising more than one ward
Appeared in Forward Plan	Yes
Executive or Council Decision	Executive (Cabinet)

Proposed Arrangements for Future Commissioning of Criminal Justice Drug Treatment Provision

1. Purpose

- 1.1 The purpose of this paper is to propose the approach to be taken for the future commissioning of Criminal Justice Treatment provision across Leicester, Leicestershire and Rutland communities and in HMP Leicester. These proposals are for consideration and ratification by the System Change Project Board and sign-off by Chief Executives. The proposals contained within this paper form part of, and are consistent with broader proposals regarding joint commissioning made as part of the Total Place Programme and have been developed in consultation with key partners.

2. Background

- 2.1 Strategic commissioning is critical to leadership of place and ensuring public services meet the needs and aspirations of their users and the wider community. Effective strategic commissioning is essential to the delivery of a coherent drug treatment system and the realisation of the improved outcomes this brings to individuals and communities.
- 2.2 The Drug System Change Pilot programme has been established to test new approaches to drug treatment and the broader social support needs of drugs users both in the community and in prisons. The Pilots will test the premise that local partnerships can achieve more if they are allowed flexibility in how they make use of the range of funding streams, including those specific to drugs, giving them the freedom to innovate and to tailor services in response to local needs.
- 2.3 Locally the project is focussed specifically on the needs of drug users in contact with the Criminal Justice System. The key aim of the project is to design and implement an integrated model of service delivery and enhanced commissioning arrangements for services for substance misusing offenders. It is clear that the enhanced arrangements must encompass delivery across the community and custodial settings and must significantly improve the reintegration of service users into the community.

3. Current Arrangements

- 3.1 In Leicester the commissioning of community based drug treatment is managed through a partnership commissioning body which reports through the Drug and Alcohol Delivery Group to the Safer Leicester Partnership. In Leicestershire commissioning of community based drug treatment provision takes place within the Leicestershire DAAT Adult Commissioning Sub Group (CSG) and reports to the Leicestershire DAAT Board.

- 3.2 For commissioning this provision the Drug and Alcohol Action Teams (DAATs) receive a number of grants/budgets from Central Government. The Pooled Treatment Budget (PTB) is a Department of Health allocation that is ring-fenced to support services for adult drug users. Additional funds are also contributed towards the PTB by the Ministry of Justice for the additional treatment hours required for Drug Rehabilitation Requirements over and above 'standard' treatment. The Drug Intervention Programme (DIP) main grant are Home Office funds that are to be used to target drug using offenders, and provide a route out of crime and into treatment.
- 3.3 Joint commissioning structures were in place across the sub-region between the three DAATs between 2001 and 2008. Following National Guidance and feedback through consultation, the Leicester DAAT and the Crime and Disorder Reduction Partnership (CDRP) merged to form an integrated Crime and Drugs Partnership for the City. This saw the disaggregation of the three DAATs and the formation of separate reporting structures in line with geographical arrangements. Although no longer part of the same structures, and having separate commissioning groups, the DAATs have continued to jointly procure services across the sub-region for drug users, supported by shared performance management and contract management arrangements. The DAATs are currently undertaking a full service re-tendering process and are intending to procure services separately on a locality basis going forward.
- 3.4 In HMP Leicester commissioning of Counselling, Assessment, Referral, Advice and Throughcare (CARAT) services is undertaken by National Offender Management Service (NOMS) through the regional Director of Offender Management (DOMs) office. More recently, following the implementation of Integrated Drug Treatment System (IDTS) in the establishment, commissioning of other drug treatment services, including specialist prescribing for substance misuse, is commissioned by NHS Leicester City as part of the Prison Healthcare contract.
- 3.5 Commissioning arrangements for drug treatment along the criminal justice pathway are therefore complex with multiple partners involved at a regional and local level. Consequently there is no one body or individual holding overall responsibility and accountability for drug treatment provided to offenders and there is no single focused strategy guiding the delivery of treatment to prisoners/offenders locally. This results in a lack of join up that can mean duplication of effort in the commissioning process (e.g. treatment planning, needs assessment etc), potential duplication of resource and limited partnership approach to achieving desired outcomes.
- 3.6 It is important to note that there is further lack of co-ordination/join up between commissioners of treatment and commissioning by those partners that have a responsibility for throughcare/wrap-around provision, i.e. housing; education, training and employment and commissioners of alcohol services and these are areas for development as part of both the System Change Project and Total Place. It is not the intention of these proposals to address these issues.

4. Proposal for Future Model and Rationale

- 4.1 The proposal for future commissioning of criminal justice treatment services has the following key components;
- Joint commissioning across the sub-region for community CJ treatment services

- Joint commissioning of treatment services across community/custody to include existing community CJ services and CARATs and IDTS services within HMP Leicester.
- 4.2 There are a number of drivers to support the development of joint commissioning processes including the Local Government White Paper, *Strong and Prosperous Communities; Our Health, Our Care, Our Say*; and the Community Empowerment White Paper, *Communities in Control, Real People and Real Power*. The joint commissioning approach is in line with the vision for intelligent commissioning in local government, as outlined in *Empowering communities, shaping prospects, transforming lives*, Communities and Local Government which views commissioning as the prime framework for service improvement and transformation.
- 4.3 Total Place indicated that where there are opportunities to jointly commission or procure services sub-regionally this should be considered and where appropriate pursued. It is proposed that commissioning of CJ treatment services across Leicester, Leicestershire and Rutland provides such an opportunity for the following reasons;
- To ensure efficient/effective delivery of DIP
 - To ensure efficient/effective delivery of DRRs as a specialised service
 - To ensure fit to local courts which service Leicester, Leicestershire and Rutland
 - To ensure fit to HMP Leicester as the local prison that services Leicester, Leicestershire and Rutland
 - To achieve economies of scale
 - To continue to deliver a 'tried and tested' best practice model
 - To avoid complications caused by cross boundary offending
 - To ensure efficient/effective systems for Police
 - To ensure efficient /effective systems for Probation
- 4.4 Further to this it is proposed that the commissioning of treatment services within HMP Leicester is aligned with the sub-regional community approach. In practice this would involve the procurement of existing CARATs services alongside community-based services and a review of the existing arrangements for the procurement of IDTS as part of the prison healthcare contract to reflect increased DAAT Officer involvement. The further benefits of this include;
- Better co-ordination of care within the prison
 - Reduced attrition when service users move between community and custody and vice versa
 - Improved consistency in range and quality of services provided within the prison and in the community
 - To remove duplication and improve efficiency
- 4.5 The intention under the new arrangements would be to commission a single fully integrated criminal justice treatment service across the sub-region and across the community/custody boundary. In order to do this and to ensure appropriate delivery for each community and each 'element' of the system it will be essential to specify the service(s) appropriately and it will therefore be essential for a balance of commissioners across the partnership to be involved in the development of service specifications and the commissioning process.

Under this approach it will be essential that particular effort is built in during the planning stage to consider delivery options that respond to the needs identified across each locality and for this reason it should be made clear that the proposals require all partners to be involved in the commissioning process and that the City 'lead' relates specifically to the procurement process. Similarly whilst the City PCT have 'lead' responsibility for the procurement process for IDTS services, DAAT Officers will play a key role in terms of needs assessment and treatment planning for this element of the treatment system to ensure join-up across the whole pathway.

- 4.6 In order to take these proposals forward commissioners will need to work together to develop formal partnership agreement(s) for the joint commissioning of services for 2011/12. These partnership agreements will provide further detail to the partnership arrangements including details of risk-sharing and processes for review of the new arrangements. There is also further work required regarding the detail of information flows under the new arrangements to ensure transparency and allow for scrutiny by all partners.
- 4.7 It should be noted that at this stage these proposals only relate to prison treatment delivered within HMP Leicester. If at a later stage it is decided that treatment delivery within the County establishments (HMP Stocken, HMP Ashwell, HMP Gartree and HMYOI Glen Parva) should also be included within the proposed arrangements a full review of the arrangements would be undertaken.

5. Expected Outcomes

- 5.1 Both the Total Place programme and the Drug System Change Project are guided by the principle that service outcomes can be improved through robust joint commissioning approaches across organisational and service area boundaries.
- 5.2 The proposed model will bring together the contributions of different partner organisations to deliver a more coherent set of services and represents the most efficient approach to commissioning this element of the treatment system. The proposed commissioning model presents an opportunity to rationalise back office support functions, and strengthen the entire commissioning process. The joint commissioning model provides the platform for more efficient use of resources, and effective delivery at every stage of the commissioning process. This will result in the optimum CJ treatment system, with the desired outcomes for service users.
- 5.3 The proposals streamline the procurement process and also allow for consideration of how System Change pilot status can be utilised to secure freedoms and flexibilities. For example, should the proposals be agreed, administrative burden could be reduced through a request to receive a single sub-regional DIP Main Grant allocation.

	Responsible Who performs the activity or does the work	Accountable Who is accountable and has Yes/No/Veto	Consulted Who needs to feedback and contribute to the activity	Informed Who needs to know about the decision or action
Analyse				
Data and Intelligence	DAAT Officers (City and County)	SLP JCG and County CSG/County DAAT Board	PCT, NOMs, Prison and wider stakeholders	
Stakeholder Mapping	DAAT Officers (City and County)	SLP JCG and County CSG/County DAAT Board	PCT, NOMs and Prison	
Consultation and Engagement	DAAT Officers (City and County)	SLP JCG and County CSG/County DAAT Board	PCT, NOMs, Prison and wider stakeholders	
Needs Analysis/Assessment	DAAT Officers (City and County)	SLP JCG and County CSG/County DAAT Board	PCT, NOMs, Prison and wider stakeholders	
Identify Commissioning Priorities	DAAT Officers (City and County)	SLP JCG and County CSG/County DAAT Board	PCT, NOMs, Prison	
Policy, Legislation and Best Practice	DAAT Officers (City and County)	SLP JCG and County CSG/County DAAT Board	PCT, NOMs, Prison	
Supply Mapping	DAAT Officers (City and County)	SLP JCG and County CSG/County DAAT Board	PCT, NOMs, Prison	
Plan				

Identify Gaps in Supply	DAAT Officers (City and County)	SLP JCG and County DAAT Board		
Agree Priorities	DAAT Officers (City and County)	SLP JCG and County CSG/County DAAT Board	Prison Partnership Board (HMP Leicester)	
Agree Treatment Plans	DAAT Officers (City and County)	SLP JCG and County CSG/County DAAT Board	Prison Partnership Board (HMP Leicester)	
Undertake EIA	DAAT Officers (City and County)	SLP JCG and County CSG/County DAAT Board		
Consider Delivery Options	DAAT Officers (City and County)	SLP JCG and County CSG/County DAAT Board	Prison Partnership Board (HMP Leicester). Category Management.	
Agree Commissioning Intentions	DAAT Officers (City and County)	SLP JCG and County CSG/County DAAT Board - These must be reconciled at this point. County CSG/County DAAT Board to communicate to SLP JCG for final sign-off.	Prison Partnership Board (HMP Leicester)	

Do				
Develop Service Specifications	1)City PCT for IDTS 2) DAAT Officers (City and County)	1)Prison Partnership Board 2)SLP JCG	1)City DAAT Officers	

Prepare Contract Documentation	1)City PCT for IDTS 2) DAAT Officers (City and County)	1)Prison Partnership Board 2)SLP JCG	1)City DAAT Officers	
Negotiate and Hold Contract	1)City PCT for IDTS 2) DAAT Officers (City and County)	1)Prison Partnership Board 2)SLP JCG		
Contract Management	1)City PCT for IDTS 2) DAAT Officers (City and County)	1)Prison Partnership Board 2)SLP JCG		

Review				
Contract Monitoring	1)City PCT for IDTS 2) DAAT Officers (City and County)	1)Prison Partnership Board 2)SLP JCG		
Performance Management	1)City PCT for IDTS 2) DAAT Officers (City and County)	1)Prison Partnership Board 2)SLP JCG		2) County CSG/County DAAT Board and Safer Rutland Partnership
Undertake Strategic/Operational Review	Operational Review - DAAT Officers (City and County) Strategic Review – SLP JCG and County CSG	SLP JCG and County DAAT Board		
Service Improvement/Redesign or Decommissioning	1) City PCT for IDTS 2)DAAT Officers (City and County)	1) Prison Partnership Board 2)SLP JCG and County CSG/County DAAT Board	1)City DAAT Officers	

Clinical Governance				
Agree Clinical Governance/Quality Schedule	City PCT	NHS Leicester City Quality Directorate		County DAAT Board

Monitoring of Clinical Governance Schedule	1)City PCT for IDTS 2)DAAT Officers (City and County)	1)Prison Partnership Board 2)SLP JCG via Clinical Governance Forum		1&2) NHS Leicester City Quality Directorate
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Budgets and Financial Control				
Identify Resources	1) City PCT for IDTS 2)DAAT Officers (City and County)	1)Prison Partnership Board 2)SLP JCG and County DAAT Board		
Budget Setting	1) City PCT for IDTS 2)DAAT Officers (City and County)	1)Prison Partnership Board 2)SLP JCG and County DAAT Board	1)City DAAT Officers	
Financial Controls	1) City PCT for IDTS 2)City DAAT for all other services	1)Prison Partnership Board 2)SLP JCG		2)County DAAT Board and NOMs
Budget Changes/New Commissioning Intentions		1)Prison Partnership Board 2)SLP JCG	2)County DAAT Board and NOMs	
Final Accounts	1) City PCT for IDTS 2)City DAAT for all other services	1)Prison Partnership Board 2)SLP JCG		2)County DAAT Board and NOMs
Audit Requirements	1) City PCT for IDTS 2)City DAAT for all other services	1)Prison Partnership Board 2)SLP JCG		2)County DAAT Board and NOMs