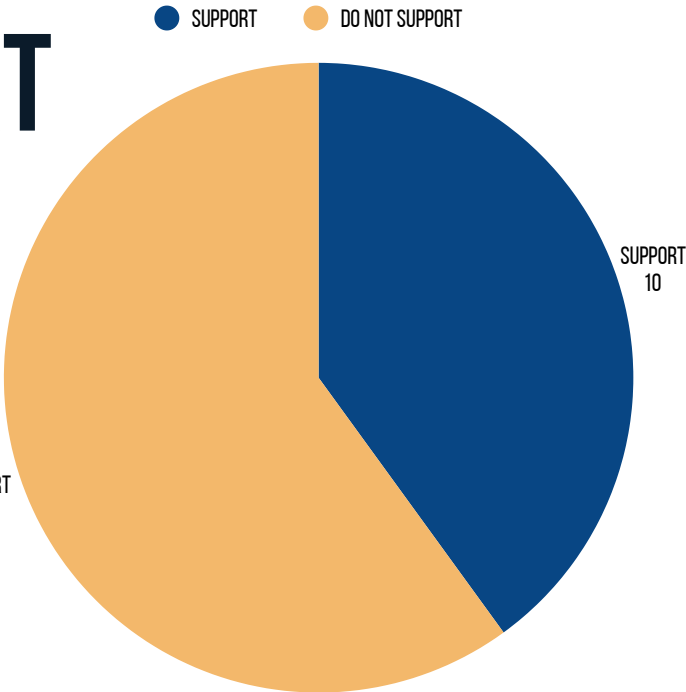
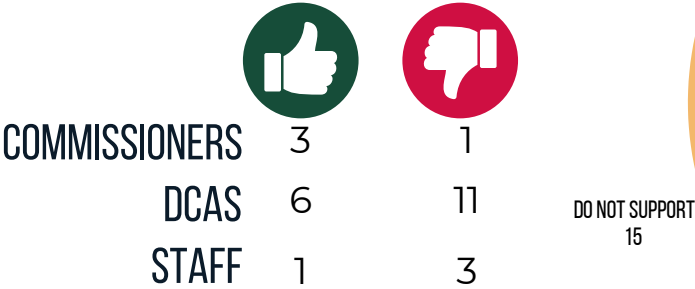




2026 RULE PROPOSAL COMMENTS

CHAPTER 5 & VRT



Comments reflected a range of perspectives on the intent of the tool, with the primary concerns focused on mandatory use of the VRT, preservation of receiving-state discretion to ‘treat as your own,’ and the impact on existing state violation response practices. Other concerns include:

- VRT is not incorporated into INSITE
- Lack of implementation plan
- Conflicts with states’ established procedures for addressing violations
- Increased workload for staff completing the VRT
- Consider requiring use of the tool only under specific conditions, such as upon request by the sending state.

ADDITIONAL OBSERVATIONS

The VRT has been available since October 2025, and states were encouraged to review and test it during the pilot and rule proposal process. However, outside of pilot states, no commenters completed the full workflow before submitting feedback, and most comments focused on anticipated impacts rather than direct use. Some responses suggest limited understanding of the tool’s purpose and the definition of “revocation,” including references to it as an “act” rather than a process, highlighting broader inconsistencies in violation reporting understanding.



CHAPTER 5 & VRT PROPOSAL REFINEMENT SUGGESTIONS

5.101

- DCA Shyra Bland (NJ)
 - Outline warrant 'tasks' as required in the system
- DCA Matt Reed (PA)
 - Add 'Discretionary' back to the title
 - Add language to section (a). "...via return reporting instructions..."
 - 3 weeks is too long, change (a) "the sending state shall notify the receiving state within **5** business days of issuing its directive..."
 - (b) should be moved to after (a)(l)

5.102

- Commissioner John Mosely (MO)
 - Specify in(c) where to document (e.g. use of OVR, PR, etc.)
- DCA Brittany Thomas (OH)
 - Add language to waive use of the tool when a violation is 'revocable'
 - Clarify retaking can still be required when the tool recommends continuing supervision
- DCA Matt Reed (PA)
 - The rule should state that the VRT is to be attached to the OVR (c) "the justification for that decision and report its findings in accordance with Rule 5.102-1 Reporting Violations Requiring Retaking."
 - While the VRT may reduce automatic retaking confusion, it could also make it more difficult for receiving states to return individuals to the sending state after serious new offenses.

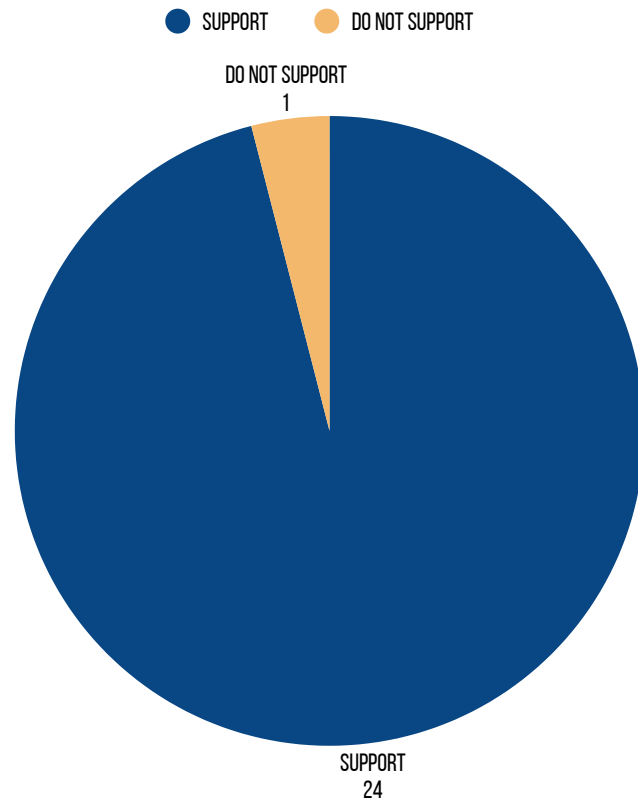
5.102-1

- Commissioner John Mosely (MO)
 - Consider requiring a 'justification'
- DCA Ali Modica (CT)
 - Clarify the 30-day requirement is measured by use of the tool
- DCA Brittany Thomas (OH)
 - Clarify the 30-day requirement is measured by use of the tool
- DCA Matt Reed (PA)
 - Add language requiring the PDF of the VRT to be attached
 - Clarify the 30-day requirement is measured by use of the tool
 - Define what the 'outcome' of the tool is in section d
- DCA Cindy Stout (TX)
 - b(3) should refer to 'current' violation(s)
 - b(4) should refer to 'prior' violations
 - b(8) should maintain original language to better clarify what needs to be reported for absconders in the OVR



REMOVE 'GRADUATED SANCTIONS'

		
COMMISSIONERS	3	1
DCAS	17	0
STAFF	4	0



PROPOSAL REFINEMENT SUGGESTIONS

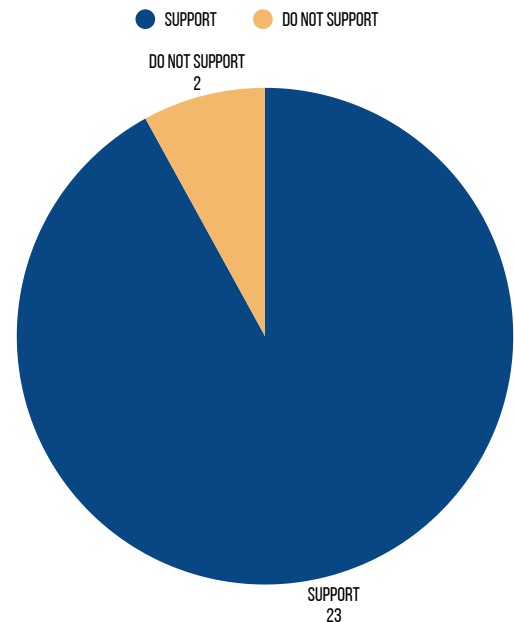
4.106

- Commissioner Matt Poyzer (AZ)
 - Restore 'that do not require retaking' language and stick to simply removing 'graduated sanctions'
- DCA Cindy Stout (TX)
 - (b) should use the term 'compliance' instead of 'response'
- DCA Kelly Palmateer (NY)
 - Restore 'that do not require retaking' language
- Compact Staff Kiea Mills (FL)
 - Add a timeframe for submission of a progress report



ADDRESS VERIFICATION FOR RI'S

3.103-2		
COMMISSIONERS	3	1
DCAS	17	0
STAFF	3	1



PROPOSAL REFINEMENT SUGGESTIONS

Commissioner Matt Poyzer (AZ)

- Restore 'and the RS agrees with the determination'

DCA Reinhardt-Stewart (NE)

- Restore language for mandatory return if transfer is not submitted in 7 days.

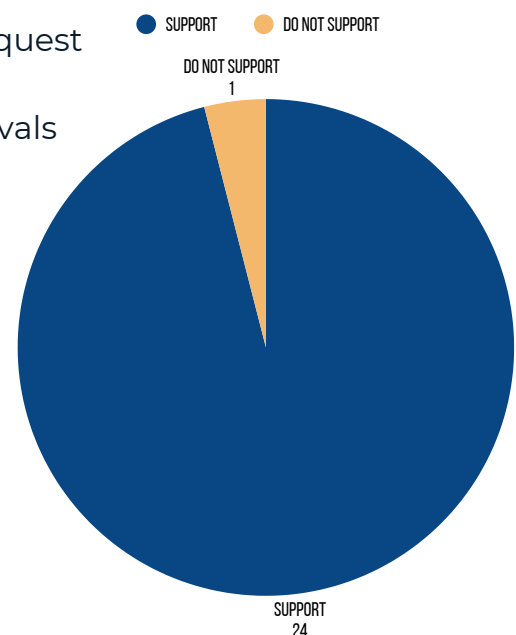
DCA Cindy Stout (TX)

- Restore language regarding denial of the transfer request

Staff Sherri Hartman (OH)

- Requirement in 3.103 is creating barriers for RI approvals

3.103-3		
COMMISSIONERS	4	0
DCAS	17	0
STAFF	3	1



PROPOSAL REFINEMENT SUGGESTIONS

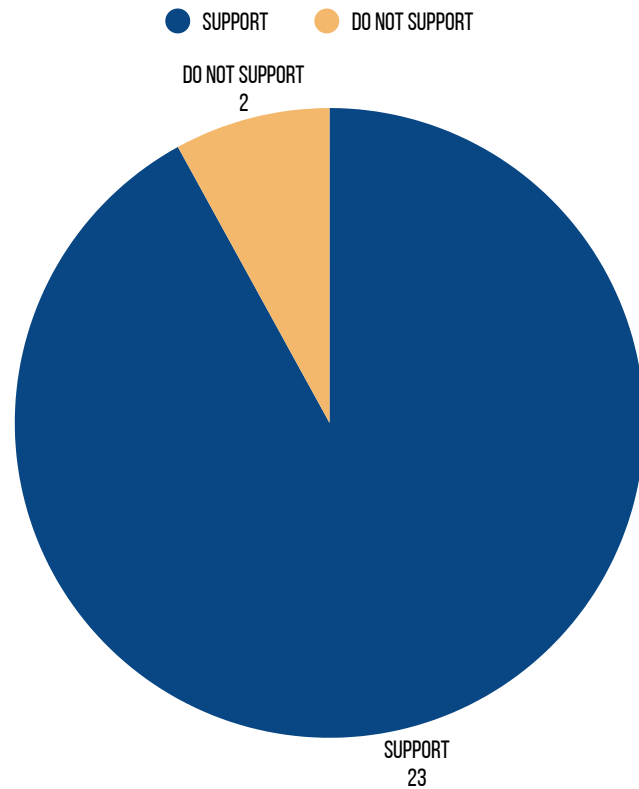
DCA Reinhardt-Stewart (NE)

- Restore language for mandatory return if transfer is not submitted in 7 days.



BY-LAW NEW CODE OF CONDUCT

		
COMMISSIONERS	4	0
DCAS	15	2
STAFF	4	0



PROPOSAL REFINEMENT SUGGESTIONS

DCA Holly Kassube (IL)

- Clarity on the need to be in a by-law if exists in rule

DCA Reinhardt-Stewart (NE)

- Clarity on 'participants in ICAOS activities'

DCA Shyra Bland (NJ)

- Clarity on whether ICOTS users are subject to the by-laws

DCA Cindy Stout (TX)

- Clarity as to whether Compact Administrators are subject to the code of conduct