PROGRAM NARRATIVE

Through the Justice Reinvestment Initiative (JRI), the state of Georgia has developed policies to focus prison beds on serious offenders, expand alternative sentencing options for judges, strengthen probation officers’ ability to respond to violations, relieve local jail overcrowding through streamlined information transfers and effective use of probation detention centers, and develop broad scale reforms that will improve outcomes for returning citizens under the Georgia Prisoner Reentry Initiative (GA-PRI). These reforms are expected to save taxpayers at least $264 million dollars by reducing the prison population by nearly 5,000 beds over five years. Using these anticipated savings Georgia invested more than $17 million annually into accountability courts, residential substance abuse treatment programs, and prisoner reentry.

PART ONE: STATEMENT OF THE PROBLEM

From 1990 through 2011, Georgia’s prison population more than doubled to nearly 56,000 inmates and corrections expenditures increased from $492 million in 1990 to $1 billion without a commensurate reduction in recidivism. Recidivism rates remained unchanged at about 29 percent from 2000 through 2011. Projections indicated the prison population would continue to grow to 60,000 inmates by 2018, at an additional cost of $264 million.¹

Drivers of Georgia’s Prison Population: In 2011, the Georgia Criminal Justice Reform Council worked with JRI technical assistance providers and Georgia justice agencies to complete a thorough analysis of drivers of the state’s prison population.² Not surprisingly, data analysis found that the growth in the prison population was largely the result of policy decisions about who is sent to prison and their length of stay. Drug and property offenders, many at low risk to reoffend, represented nearly 60 percent of all prison admissions. Meanwhile, Georgia’s prison population continued to grow, and the length of sentences increased. Judges had few sentencing options aside from prison; probation and parole agencies lacked the capacity to adequately
supervise offenders in the community or to deliver interventions to reduce re offending\textsuperscript{3}. Subsequently, beginning in 2011 and continuing today, the Council’s reforms, led by Governor Nathan Deal and unanimously supported by the Georgia legislature, touch on many aspects of the criminal justice system and are intended to: ensure access to effective community-based services and sanctions for higher risk offenders, strengthen community supervision through improved use of risk and need assessment to drive case planning, ensure resources are used effectively to improve performance, focus expensive prison beds on serious offenders, and reform policies and practices to improve the outcomes of Georgia’s returning citizens.

\textit{Policy Driven, Data Informed Decision Making - Drivers of Recidivism:} The GA-PRI is using robust data to inform decision making. The Georgia Department of Corrections (GDC) embarked upon the development of a series of automated risk-needs assessment tools referred to as the Next Generation Assessment (NGA) project to replace paper-pencil risk-needs assessments. GDC continues to incorporate assessed risk (e.g., risk for arrest), assessed program-specific need (e.g., substance abuse need), and assessed motivation (responsivity) to guide programing decisions.

The NGA identifies the target population for the initiative by utilizing a rich source of information ("prisoner pipeline data") based on risk and needs levels of individuals expected to return to the pilot sites between October 2014 and September 2015. These data, based on NGA risk and needs assessments of the current prison population, show the number and percentage of prisoners who are low, moderate and high risk and for each of those risk levels, their level of criminogenic needs for services to address their needs for: substance abuse, education, and employment needs, cognitive restructuring (based on their level of criminal thinking) and their needs around negative peer associations and mental health needs.
Target Population Size, Supervision Type, Demographics and Characteristics: The primary target population for the GA-PRI State Recidivism Reduction Project is moderate to high risk returning citizens (based on their relative risk of committing a new felony). In terms of their supervision levels, of the 21,166 prisoners released to Georgia’s communities in 2013, 95 percent (20,156) fell under some form of community supervision\(^4\) and five percent (1,014) maxed out with no supervision. The majority of people receiving post-prison supervision are men (58 percent) and under 40 years old (66 percent)\(^5\). In terms of their criminogenic needs, across the first round of community sites – the immediate target for the first year of implementation and the subject of the recidivism reduction evaluation - 86\% (2,325) of the target population (2,696 prisoners with a moderate to high risk of committing a new felony) have moderate/high substance abuse service needs; 90\% (2,421) have moderate/high educational needs; 92\% (2,487) have moderate/high employment needs; 92\% (2,470) score moderate/high on association with negative peers; and 88\% (2,386) score moderate/high on criminal thinking. These characteristics point to a specific set of services that will need to be addressed at the community sites. (See Addendum No.1: 2014 Pilot Site Target Population Characteristics).

Baseline recidivism rate: Reviewing the most current data on prisoners based on NGA assessments for the first six community pilot or demonstration sites (Bibb, Chatham, Dougherty, Fulton, Muscogee and Richmond Counties), a total of 3,698 current prisoners are expected to be released in the one year period of October 2014-September of 2015. An NGA data snapshot of these prisoners (taken in mid-June 2014) shows 2,696 of these (73\%) as moderate to high risk\(^6\). Based on a review of 3,125 similar offenders in the state’s NGA baseline data set, moderate/high risk prisoners have a 60 percent to 81 percent recidivism rate, defined as committing a new felony within three years of their release. Overall, 50\% of all offenders will be re-arrested over
3-years. Considering re-conviction, moderate risk returning citizens have a 29 percent re-conviction rate over three years compared to high risk who have a 49 percent rate.

The next round of community sites will include 5 additional counties (Cobb, Gwinnett, Clayton, Douglas, Newton) with a combined recidivism rate of 34% for moderate to high risk prisoners, and the third round that will be implemented during the three year grant cycle includes 5 additional counties (Hall, Floyd, DeKalb, Bartow, Troup) with a combined 35% two year recidivism rate for moderate to high risk prisoners. All total, over the course of the three year grant cycle, the 16 counties that comprise the first three rounds of implementation have a two year, felony re-arrest recidivism rate of 34% of 6,669 prisoners or 2,342 recidivists. The GA-PRI will go statewide and up to scale in 2018 by expanding the boundaries of the first 16 counties so they become contiguous sites. (For a complete set of data and analyses for both the statewide baseline rate and the rate for the pilot sites as they are expected to be phased in during the three year grant cycle, see Addendum No.2: Georgia Statewide Recidivism Reduction Analysis by Pilot Site Phase In). Violation rates in Georgia are historically low at 27 percent with urban counties higher than non-urban counties.

**Structural and Policy Barriers to Reduce Recidivism:** During the planning phase of the State Recidivism Reduction Grant program, Georgia leaders were fortunate to have the expertise of the Council of State Government’s National Reentry Resource Center (CSG/NRRC) which provided extensive technical assistance throughout the year long planning phase. CSG/NRRC used the Planning and Implementation Planning Guide (PAIG) to focus the work on policies, practices and programs that are most likely to reduce recidivism. The PAIG involves a series of checklists that assist the core justice and non-justice agency leaders to identify strengths and weaknesses of the GA-PRI and its implementation plan. The four primary structural and policy
barriers will be addressed through the implementation of the project design and are discussed in detail in the next section. They are: (1) New policies and practices and the need for training, especially concerning transition accountability planning; (2) Programming in prison and in the community and the need to appropriately match the target population to programming that is responsive, well timed and in the proper dosage; (3) Staffing and staging issues concerning the work force needed for implementation and how that work is scheduled over the course of the next five years; and, (4) quality assurance to ensure sustainability. (See The Georgia Planning and Implementation Guide on file with the CSG/NRRC).

PART TWO: PROJECT DESIGN AND IMPLEMENTATION

Organized by Governor Nathan Deal to formulate, advance and monitor inter-branch, bipartisan justice policy reforms, the Georgia Council for Criminal Justice Reform (Council) has engaged the executive, legislative, and judicial branches of state government, as well as the nonprofit, corporate and advocacy communities.

Coordination of Activities across Initiatives: The Council serves as the venue for data analysis, policy development, impact assessment and oversight of justice reforms through the lenses of a diverse group of justice and non-justice stakeholders, including district attorneys, public defenders, judges, legislators, businesses, human service providers and reform advocates. In order to ensure that all justice reform initiatives are coordinated, the Council has statutory responsibility to oversee the implementation of HB 1176 and its outcomes. 7,8

By way of background, the first phase of reforms culminated in the unanimous passage of HB 1176 (2012) which focused on sentencing reform, expansion of accountability courts, probation services, and enhanced data-sharing among agencies and will avert the projected eight percent increase in Georgia’s prison population over five years and reduce the prison population
from present levels\textsuperscript{9}. The reforms will stem the tide of projected prison growth from nearly 60,000 in 2018 to 54,690, saving at least $264 million\textsuperscript{10}. The second phase of reforms focused on juvenile justice and resulted in the unanimous adoption of HB 242 (2013) which will save an estimated $85 million over five years, reduce recidivism by focusing out-of-home facilities on serious offenders and investing in evidence-based programs and streamline and revise the state code relating to juvenile justice and child welfare, including creating new processes for cases involving children in need of services\textsuperscript{11}. The third phase of reform, and the subject of this grant application, will improve public safety by reducing crimes committed by citizens returning to their communities upon release from prison. Through executive order, Governor Deal created the Governor’s Office of Transition, Support and Reentry (GOTSR) to implement the reforms and in January of 2014, the Council unanimously adopted the GA-PRI as the approach to reduce recidivism, reduce victimization, and create efficiencies and cost savings in the adult reentry system (See Addendum No. 3: Report of the Criminal Justice Reform Council – January 2014).

It is important to note that Georgia has made significant progress in implementing HB 1176, HB 242 and other policy reforms stemming from this unprecedented attention to reforming the justice system that provides for a phased implementation of the policy changes and requirements. On all fronts, implementation has moved steadily forward\textsuperscript{12} and the state has invested heavily in the JRI: all total, from FY 2013 through FY 2015, Georgia’s JRI funding totals over $48 million\textsuperscript{13}. But the Governor, the Council, and Georgia’s justice agencies acknowledge that the return-to-prison recidivism rate must drop in order to protect public safety and support the success of the first phase of adult criminal justice reform. Equally important is the awareness of research findings that show implementation of evidence-based practices with the benefit of expert guidance leads to a much higher success rate much more quickly\textsuperscript{14}. As a
result, the state developed the GA-PRI to address the needs of Georgia’s returning citizens.

The GA-PRI: Effective Correctional Practices to Improve Prisoner Reentry: The vision of the GA-PRI is that returning citizens released from prison will have the tools and support needed to succeed in the community. In order to make this vision a reality, the mission of the GA-PRI is to improve public safety by reducing crime through implementation of a seamless plan of services and supervision developed with each returning citizen—delivered through state and local collaboration—from the time they enter prison through their successful transition, reintegration, and aftercare in the community. The initiative gives Georgia the tools to become a national leader among states in recidivism reduction.

The fundamental goals of the GA-PRI are to: (1) Promote public safety by reducing the threat of harm to persons, families and their property by citizens returning to their communities from prison; and (2) Increase success rates of returning citizens who transition from prison by fostering effective, evidence-based risk and need management and treatment, returning citizen accountability, and safe family, community and victim participation. Performance measures to determine the degree that these goals are met include measurements of increased public safety through the reduction of recidivism as measured by re-conviction, return to prison, and successful completion of community supervision.15

In January 2014, the Council adopted the GA-PRI Framework, which provides state agencies and local partners with the tools to move from planning to implementation (See Addendum No. 4: The GA-PRI Framework Summary). At the heart of the initiative is the Georgia Prisoner Reentry Initiative Framework (Framework). The Framework was designed for Georgia but builds on approaches for reentry improvement developed by the National Prisoner Reentry Council, as outlined in its Reentry Policy Council Report,16 and the National Institute of
Corrections through its Transition from Prison to Community (TPC) Model. (See Addendum No. 4 for an illustration and greater detail). These approaches provide guidance for specific justice policies that will be considered in Georgia as the “Targets for Change” to improve prisoner reentry. These Targets for Change are categorized within the three TPC Model phases (Getting Ready, the Institutional Phase; Going Home, the Pre-Release Phase; and Staying Home, the Community Supervision and Discharge Phase) and seven primary decision points that comprise the reentry process. For each Target for Change, goals and operational expectations are included, as well as references for further reading to specific pages within the voluminous Reentry Policy Council Report and other publications that pertain specifically to the Target for Change that is being addressed. Thus, the Framework provides a practical guide to help direct Georgia’s plan to meet the policy goals and operational expectations of the Council. The Framework also frees state agencies to begin to focus immediately on implementation. Importantly, the Framework underscores the three overarching policy and practice considerations that must be in place to truly reform a returning citizen’s behavior: Transition Accountability Planning, Case Management and Evidence-Based Practices. The Framework also provides state agencies and local partners with the tools to move from planning to implementation and to accurately measure changes in recidivism. By moving reentry planning beyond high-level strategy to a focus on action, the GA-PRI can more quickly result in recidivism reduction. The priorities for implementation of the GA-PRI Framework include an improved transition accountability planning process with each returning citizen, from the point of imprisonment through successful discharge from post-release community supervision, with an emphasis on safe, affordable housing and employment.

The Council also adopted in January 2014 the GA-PRI State Governance Structure which
stems from the leadership of Governor Nathan Deal and the Council. The Structure includes Georgia’s justice agencies (the State Board of Pardons and Paroles (SBPP), GDC, Department of Juvenile Justice (DJJ)), other state departments such as Behavioral Health and Developmental Disabilities, Community Health, and Human Services, and statewide human services organizations, and faith-based leaders. The GOTSR manages and administers the GA-PRI Implementation Steering Team (IST) that guides prisoner reentry reforms through local work groups and department-based resource teams which will spearhead the GA-PRI throughout the state in a unique, diverse and robust state/local partnership (See Addendum No. 5: The GA-PRI State Governance Structure).

For 2014, the priorities include the development of state and local organizational structures, the development and implementation of the Transition Accountability Planning (TAP) process – especially prior to release through “prison in-reach services (See Addendum No. 6: Prison In-Reach and the Importance of Transition Accountability Planning) - the identification of moderate to high risk/moderate to high needs prisoners who will return to their communities beginning in October of 2014, and the development of Community Assessments that catalogue current reentry services for each community (assets), the barriers that prevent or diminish access to the services by returning citizens, and gaps in those services (See Addendum No. 7: the GA-PRI Community Assessment Instrument). The emphasis of the TAP process is safe, affordable housing and employment and is driven by Georgia’s unique risk/needs offender assessment instrument, the Next Generation Assessment (NGA) which has now been applied to all 53,000 state prisoners (See Addenda Nos.8 & 9: The NGA: Georgia’s Next Generation Assessment System and the GA-PRI Case Logic Model).

GA-PRI is being piloted in six Georgia counties that have made the most significant
advances in local reentry development, with five additional counties targeted for implementation in 2016, and an additional five counties in 2017. The balance of the state will be implemented in 2018 so that the effort is statewide and up to scale. Each pilot site is engaging in reentry planning through local reentry councils with the support of a local coordinator as well as a reentry housing coordinator provided under GA-PRI justice reinvestment funding (See Addendum No. 10: The GA-PRI Local Governance Structure).

**Statutory SCA Grant Requirements:** The Bureau of Justice Assistance provides a series of expectations and requirements for states that are applying for State Recidivism Reduction funding. The status and progress in Georgia under the GA-PRI in meeting these requirements, including the use of Evidence Based Practices, are assessed and shown in the Budget Narrative. For both sets of expectations, the GA-PRI is already implementing.

**Mandatory Grant Requirements:** Georgia will engage in a comprehensive implementation process that will span a 36-month period and will be driven by the Statewide Recidivism Reduction Strategic Plan completed during the FY 2013 grant-funded process which clearly describes the policy and procedural changes, capacity-building activities, and programmatic investments the state will undertake to achieve their desired reduction in overall recidivism. Georgia is committed to the following four activities in the implementation process (Responsibilities for these activities are included in the Budget Narrative as well as in Attachment No. 1, Job Descriptions and Resumes): (1) The explicit support provided from Georgia Governor Nathan Deal as the state’s chief executive officer (See Attachment No. 2); (2) The support from the Georgia Commissioner of Corrections, Brian Owens and the Director of the State Board of Pardons and Parole, Michael Nail; (See Attachments No. 3 and 4); (3) The on-going work of the collaborative GA-PRI Implementation Steering team to guide and oversee the implementation
process. The team includes a representative cross section of state policymakers, agency directors and managers, community partners, and line staff that will be directly affected by the plan (This group was involved in the FY 2013 SRR planning grant process); and, (4) The development by the GA-PRI Implementation Steering Team of a comprehensive implementation work plan, within the first 4 months of the implementation phase of the project, based on the PAIG provided by CSG/NRRC. Importantly, the agencies that are critical to the GA-PRI have signed a Memorandum of Agreement stating their intentions to work collaboratively. (See Attachment 5).

**Need for Funding: Using Allowable Funds to Reduce Recidivism:** Clearly, Georgia has dedicated significant resources to criminal justice reforms. Millions of dollars are being spent on expanding accountability courts, developing new assessment tools, and providing additional mental health and drug treatment services. Using state reinvestment dollars, GOTSR is staffed and has the benefit of expert technical assistance. Georgia has been fortunate to receive funding for JRI Phase Two as well as the funding for the planning phase of this grant. The state has made applications for federal funding for several Second Chance Act grants (Information Sharing, Smart Supervision, Maximizing the Impact of JRI) which do not include the staffing, contracts, training, and evaluation costs specifically requested for funding under this Project. Rather, the funds will greatly augment a diverse funding plan for the GA-PRI using a balanced mix of federal, state and local funds. (See Attachment No. 6: Disclosure of Pending Applications).

This section describes the funded components of the grant application by (1) describing the intent and purpose of the funding; (2) reviewing the allowance for the funding as indicated in the BJA Solicitation (some of these apply to more than one funding category); and (3) when applicable, providing detailed footnotes that describe the results of the iterative process with the SRR Planning Grant’s Technical Assistance Provider, the Council of State Government (CSG),
using their *Planning and Implementation Guide* (PAIG).

**Project Coordinator:** This funding will be used to hire a full time person to coordinate all aspects of the grant which supports the GA-PRI. The Project Coordinator will report to Jay Neal, Director of the Governor’s Office for Transition, Support and Reentry (GOTSR). The position will be funded using state dollars once the grant ends in 2018.

**BJA Funding Allowance:** It is a mandatory funding requirement under the solicitation to hire an experienced full-time coordinator to staff the implementation steering team and facilitate the development and execution of the implementation work plan. The responsibilities of the Project Coordinator include but are not limited to many of the requirements under the solicitation such as: (1) Sharing data and working closely with BJA’s technical assistance provider, the CSG National Reentry Resource Center (NRRC), during the implementation phase; (2) Determining the types of intensive technical assistance that will be requested of the NRRC during the implementation process; (3) As part of the GOTSR GA-PRI team, working with the GA-PRI Implementation Steering Team that helps guide and oversee the implementation process. The team includes a representative cross section of state policymakers, agency directors and managers, community partners, and line staff that will be directly affected by the plan; (4) Developing a comprehensive implementation work plan within the first 4 months of the implementation phase of the project based on the PAIG.

**Quality Assurance Protocol Developer:** This position is essential to the statewide implementation and sustainment of the GA-PRI so that its risk reduction goals are achieved and maintained. As the process and impact evaluation of the GA-PRI by Applied Research Services, Inc. (ARS) is implemented, shortcomings by state agencies and community partners will need to be addressed through specific measures during the grant cycle and then permanently assessed.
and responded to through these entities existing Quality Assurance processes. This use of funds is recommended by CSG/NRRC.¹

**BJA Funding Allowance:** BJA budget allowances include funding for: (1) quality assurance; and (2) efforts to promote the use of evidence-based programs and strategies by third-party service providers that provide substance abuse, mental health, and behavioral health treatment; aftercare; and reentry services.

**Housing Partnership Coordinator:** One of the most pronounced needs in the Georgia post-prison supervision and services continuum, documented in the Georgia Criminal Justice Reform Council Report (January 2014) is for sustainable housing. As a result, the Governor has committed $1.6 million over the three year grant cycle for local Housing Coordinators beginning with the first five GA-PRI sites in 2014. In addition, Georgia has had a dedicated position working for the State Board of Pardons and Parole to help develop and coordinate housing for parolees. What is missing is a similar position for post-prison probationers – who are released in great numbers to Georgia communities (5,000 returning citizens estimated in 2014) – and who are in need of housing. This position is to coordinate and support the work at the community level through enhanced partnerships with housing providers. This use of funds is recommended by CSG/NRRC.²

¹ **Council of State Government Recommendations:** As part of the Technical Assistance (TA) process during the SRR Planning Grant phase of the grant process, CSG recommended: (1) *Participant feedback should be included as part of the quality assurance procedures.* Participants can be surveyed as to their satisfaction with service/program. This can include exit surveys/interviews, post release surveys, phone calls, etc.; (2) *Quality assurance for community providers:* As part of the TAP2 process, prison in-reach will be supported. As such, a formal process for vetting the quality of service providers should be established. The grant could also be used to establish a Quality Assurance Response Fund that can be used to address shortcomings identified in the assessment, such as providing booster trainings for staff or providers.

² **Council of State Government Recommendations:** As part of the Technical Assistance (TA) process during the SRR Planning Grant phase of the grant process, CSG recommended: (1) *Gaps and Barriers for Transition Planning.* There are several gaps and barriers that will need to be addressed to roll out the TAP2 successfully, including increasing the capacity of counseling and community supervision staff, training and sharing information with community providers, and reducing legal and policy barriers to accessing benefits and services (Reference PAIG, Exercise No. 3, Item 11).
BJA Funding Allowance: BJA budget allowances include funding to: (1) Target criminogenic needs that affect recidivism; and, (2) Promote the use of evidence-based programs and strategies by third-party service providers that provide substance abuse, mental health, and behavioral health treatment; aftercare; and reentry services.

Community Coordinators: At each of the five GA-PRI community pilot sites, a full time community coordinator is being established, beginning with five in 2014 (a sixth is being funded by SBPP), five more in 2015, an additional five in 2016 immediately prior to taking the GA-PRI statewide and up to scale. The duties of the Community Coordinators are outlined in Attachment No. 1, Job Descriptions and Resumes. Some of the most critical aspects of these positions is their oversight of transition accountability planning (case planning) from the point of prisoners’ preparation for release under the TAP2 – in coordination with prison-based EBP counselors and programmers (see next funding category) – through returning citizens’ discharge from supervision (TAP4); and working with third party service providers to assure adherence to Evidence Based Principles and Practices under the TAP3. This use of funds is recommended by CSG/NRRC.3

BJA Funding Allowance: BJA budget allowances include funding to: (1) Provide sustained case planning/management from prison to the community; (2) Promote the use of evidence-based programs and strategies by third-party service providers that provide substance abuse, mental health, and behavioral health treatment; aftercare; and reentry services.

Evidence Based Prison Facility Staffing: The GA-PRI Framework includes the three phase, seven decision point Transition from Prison to Community (TPC) Model developed by the National Institute of Corrections and expands it considerably into 26 policy and service areas that

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3 Council of State Government Recommendations: As part of the Technical Assistance (TA) process during the SRR Planning Grant phase of the grant process, CSG recommended: Community Coordinator Positions: These positions are the linchpin of the GA-PRI community model, and will play a key role in ensuring individuals are connected with services identified as needed on their TAP2 and TAP3. It will be important that the team has a plan for sustaining these positions after the grant period ends.
are the state’s “Targets for Change”. The implementation of the GA-PRI, like many states, began with Phase Two (Going Home, the Pre-Release Preparation Phase) and Phase III (Staying Home, the Community Supervision Phase) – where massive change toward EBPs is underway under robust state and local organizational structures.

Under this grant, the GA-PRI will begin implementing Phase I (Getting Ready, the Institutional Phase) by developing a “Learning Site” Evidence Based Prison Facility (EBP Facility) where policy-driven, data-informed decision-making will be used to revamp policies, practices, programs, staffing and staff training. This facility will be selected based on criteria that includes; proximity to one or more community pilot sites, the number of moderate to high level prisoners who are released from the facility, and the competency and capacity of the prison facility staff and leadership to manage change. Three positions are critical to the effort and are fully described in Attachment No. 1, *Job Descriptions and Resumes*: a supervisor who will be selected to oversee the effort and whose current salary will be augmented with additional funds from the grant; an EBP Program Coordinator who will oversee the adaptation, expansion and/or development of EBP prison based programming; and three full time counselors who will be responsible for the oversight of transition accountability planning (case planning) from the point of prisoners’ preparation for release under the TAP2 – in coordination with local community coordinators and working with the selected trainers for the goal centered, motivational skill development training that is being proposed for 120 staff at the EBP Facility (see below). This use of funds is recommended by CSG/NRRC.4

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4 *Council of State Government Recommendations*: As part of the Technical Assistance (TA) process during the SRR Planning Grant phase of the grant process, CSG recommended: (1) *Policies are being reviewed and revised to incorporate new work processes*. These will result from the NGA and Transition Accountability Plan (TAP) process. Examples of these policies include assessment and reassessment processes, classification policy, and case planning expectations. Quality assurance measures are also being developed to ensure new policies under the NGA/TAP process are being followed (*PAIG Exercise No. 3, Items 3, 4, and 15*); (2) *The TAP process requires intensive, client-centered engagement*. As such, the skills and capacity of institution-based counselors will need to be enhanced so that they can conduct motivational case planning interviews effectively. Other staff responsible for case planning, programming, volunteer work, and reentry will also need to be trained on the NGA and TAP process; funding for in person trainings throughout the state is limited (*PAIG Exercise No. 3, Items 5, 14*); (3) *GDC has provided an extensive list of programming that will be offered to the target population*. Prior to implementing the suggested
BJA Funding Allowance: BJA budget allowances include funding to: Provide sustained case planning/management from prison to the community.

Without the resources being requested through this grant application, it will be many years before Georgia can afford the intensive services, staffing, contract training support needed to translate the principles of evidence-based principles into practice and embed these new practices into standard operations for the GDC and the SBPP under the GA-PRI.

Replication: Despite extensive national attention to reforming prisoner reentry approaches in the last decade, in most states the return-to-prison recidivism rates of former prisoners have not changed substantially. The most recent comprehensive study of state-level offender recidivism was performed by the Pew Center on the States for their 2011 report entitled State of Recidivism: the Revolving Door of America’s Prisons.\textsuperscript{19} The study’s findings showed that, out of the 33 states that reported recidivism data for both the 1999 and 2004 release cohorts, only 17 states had a decrease in recidivism and 16 states had an increase in recidivism. Only six of the 33 states achieved a drop in recidivism of greater than 10%.\textsuperscript{20} One of the primary reasons for this lack of success is that the work of moving from planning to implementation for system-wide change requires an extraordinary level of coordination and capacity. Research shows that efforts aimed at implementing evidence-based practices which have the benefit of expert and organized guidance have a much higher—and much quicker—success rate at implementation.\textsuperscript{21}
Over the past decade, knowledge of the science related to developing and identifying evidence-based policies, practices and programs has improved. However, the application of the emerging science about how to implement and sustain these policies, practices and programs with fidelity that results in improved outcomes—particularly on a large scale—lags behind. Researchers have established the need to achieve a better link between what research evidence shows works and how to implement that research on the ground, particularly with recidivism reduction.\textsuperscript{22} Clearer guidance is needed in the field on how to implement research findings and how to successfully replicate well-performing programs in prisons and parole agencies and their human service delivery partners in the community.\textsuperscript{23} Georgia can provide that guidance: many of the aspects of the GA-PRI are replicable including: the GA-PRI Framework, the State and Local Governance Structures, the GA-PRI evaluation methodology, the Prison In-Reach and Transition Accountability Services protocols, the Community Assessment Instrument, the Pipeline Data, the approach for local Comprehensive Planning, and the many training curricula that have been, or will be, in place.

**PART THREE: CAPABILITIES AND COMPETENCIES**

As can be seen by the historical perspective of Georgia’s criminal justice reform efforts described above, the GA-PRI, managed by GOTSR, is well positioned to provide guidance, mentoring, technical assistance, training, and evaluation expertise for the entire reentry process from pre-release to post-release community support. GOTSR is administratively attached to the Georgia Department of Corrections (GDC) for resources and support. GDC as an executive level agency is tasked with supervising each offender that enters the Georgia prison system and is uniquely poised to assist the GOTSR with the implementation of the GA-PRI. GA-PRI is a collaborative effort between the Council, the IST, and the organizations and agencies that
comprise the GA-PRI Local Governance Structure (See Part Two above, for details and references to addenda). If awarded funding, a full time project coordinator will be hired and will report to the director of GOTSR.

The Project Coordinator’s primary responsibilities will be to: (1) Manage the collaboration and coordination of project deliverables across the five pilot sites, including cross-training and information-sharing that will assist in achieving the performance-based goals and objectives of the project; (2) Consult and collaborate with state and local agencies, organizations, and community leaders and experts in the areas of post-prison release decision-making, reentry, and community supervision to improve probation and parole operations as they affect the success of returning citizens; (3) Identify barriers that may hinder the successful implementation of the project and recommend to GOTSR and the IST policies, procedures, and programs to overcome such barriers; (4) Act as liaison with professional associations, volunteer and faith-based organizations, and local treatment and rehabilitation agencies to collaborate on the GA-PRI; (5) Oversee the data and reporting required by the Bureau of Justice Assistance; and (6) Work with ARS to design and monitor data collection and the project evaluation.

The executive director of GOTSR, Jay Neal, will provide the leadership and strategic vision for the GA-PRI and Georgia Prison Reentry Initiative – Recidivism Reduction Project. Mr. Neal resigned as a representative of the Georgia House of Representatives to accept Governor Deal’s appointment as director of the GOTSR. Mr. Neal served in the legislature for nearly a decade and was a key supporter of the Council’s criminal justice reforms in 2011 through 2013. Previously, Mr. Neal was the director of a faith-based recovery facility in northwest Georgia.

The GA-PRI and this project will receive additional support from the Michigan Crime and Delinquency, Center for Justice Innovation that created the framework upon which the GA-
PRI Model is based. The director of the Center, Dennis Schrantz, has over 30 years of experience in managing large scale projects, including the Michigan Prisoner Reentry Initiative, which became a nationally-recognized success story by reducing recidivism by over 36 percent for 17,000 moderate to high risk returning citizens. Center staff will assist with the implementation and supervision of this project focusing on technical assistance, training and sustainability.

Georgia also benefits from a great deal of technical assistance from national organizations, which are engaged in Georgia for other, related projects: the Vera Institute for Justice provided assistance to the Council and the GDC under Phase II of the Justice Reinvestment Initiative; the Council of State Governments is working with the SBPP and GDC as part of Georgia’s Statewide Recidivism Reduction Grant, the Annie E. Casey Foundation is helping to implement the juvenile justice reforms, and The Pew Charitable Trusts is a long-standing partner in the JRI work. (See Attachment No. 1: *Job Descriptions and Resumes*).

**Collaborative Partnerships – Creating Synergy through a State/Local Partnership:**

The GA-PRI Implementation Steering Team (IST), previously described, will be working for the next five years and beyond to implement the GA-PRI Framework. Initially the IST will function through three Workgroups, one representing each of the Phases in the GA-PRI. Each workgroup has co-chairs appointed by Governor’s Counsel and will be facilitated and staffed with a GOTSR employee. The major areas of focus of the IST that will be addressed through a committee/subcommittee structure include: (1) Identify barriers and challenges in each department or agency that may hinder the successful transition of offenders returning to communities and develop policies, procedures, and programs to overcome such barriers: (2) Improve collaboration/coordination of offender transition services including cross-training, information-sharing systems, and policies, procedures, and programs that measure offender
reentry management with well-defined, performance-based outcomes – driven by “pipeline data” that includes the numbers of persons expected to be released from October 2014-September 2015 and their composite risks and needs; (3) Consult with state and local agencies, organizations, and community leaders with expertise in the areas of prison facilities, parole decision-making, reentry, and community supervision to collaborate on offender transition issues and ways of improving operations; (4) Consult with representatives from professional, volunteer and faith-based organizations, and local treatment and rehabilitation agencies to collaborate on offender transition issues and ways of improving operations; (5) Provide recommendations as to how the Governor and other state departments and agencies can assist in overcoming the barriers it has identified to the successful transition and reintegration of returning citizens; (6) Provide recommendations on how state laws and sentencing guidelines may be improved in order to contribute to the successful reintegration of offenders into society and reduce recidivism.

PART FOUR: IMPACT, PERFORMANCE, EVALUATION AND SUSTAINMENT

The goal of this SRR grant program is for states to reduce their baseline statewide recidivism rate. The objective of the program is to support effective strategies for reducing recidivism and enhancing public safety. As such, the Georgia GA-PRI Recidivism Reduction Project will: (1) Focus on the individuals most likely to recidivate; (2) Use risk and needs assessments to inform resource-allocation decisions and individual case responses; (3) Establish and scale up evidence-based programs and practices that reduce recidivism and ensure they are implemented with fidelity; and, (4) Implement community supervision policies and practices that promote successful reentry. In order to achieve a well-defined recidivism reduction goal, Georgia stakeholders will implement several strategies that include system wide, sustainable changes to policy and procedure and investments in capacity-building activities including staff skill
The Georgia Prisoner Reentry Initiative – Recidivism Reduction Project

development, investing in assessment and case management tools, and targeted programming investments that address high-risk individuals’ criminogenic and behavioral health needs. The GA-PRI is informed by a data-driven assessment of the needs of the target population, drivers of recidivism in the state, and system limitations including both policy barriers and resource gaps.

**Goals and Objectives, Expected Outcomes:** The two and five year goals of the GA-PRI State Recidivism Reduction Project are to reduce the overall statewide recidivism rate by 7 percent in two years (from 27 percent to 25 percent) and to reduce the statewide recidivism rate by 11 percent over five years from, 27 percent to 24 percent. In order to meet this goal, objectives include implementing a series of community demonstration or pilot sites, six in Year One (Phase One), five more in Year Two (Phase Two), and five more in Year Three (Phase Three) with each group of sites demonstrating five year recidivism rate reductions which will drive down the statewide recidivism rate. The two and five year recidivism rate reduction goals for the 16 community sites are to reduce the rate by 12 percent over two years (from 34 percent to 30 percent) and by 21 percent over five years (from 34 percent to 27 percent). Table 3 (Endnotes) shows the combined 5-year impact of the GA-PRI among a 16 county roll-out that begins in October 2014 followed by an additional five counties in 2015 and an additional five in 2016.25

Operational objectives include: (1) Coordinate the implementation of the Project by developing a comprehensive implementation work plan within the first four months of the implementation phase of the Project; (2) Implement an RNR-based collaborative, three phase case planning and service delivery system (Transition Accountability Planning) among prison staff, post-release supervision staff, local reentry implementation teams and pre- and post-release reentry service providers for moderate to high risk returning citizens that focuses on addressing their criminogenic needs based on the GA-PRI Framework that is managed by the Georgia
Office for Transition, Support and Reentry (GOTSR); (3) Select a prison facility within the Georgian Department of Corrections (GDC) as an Evidence Based Learning Site and provide the staff and training resources needed to implement evidence-based RNR and other principles and practices of effective intervention – including skill enhancement training to maximize prisoner behavior change; (4) Develop and implement a system to assist returning citizens who are on probation supervision under GDC upon release from prison with housing similar to the system that is in place for returning citizens who on parole supervision upon release under the authority of the State Board of Pardons and Parole (SBPP); and (5) Improve GA-PRI by adding capacity to (a) Adapt and improve existing graduated response policies and procedures for parole and probation post-release supervision and train top managers in the use of the adapted system, (b) Develop a full range of policies and procedures for activities and programs related to the GA-PRI so that fidelity to, and the sustainability of, the GA-PRI Framework is assured, (c) Develop and implement a process to measure and report on Quality Assurance that demonstrates the use and efficacy of evidence-based risk, need, responsivity (RNR) and other principles and practices of effective intervention by prison staff, parole and probation officers, managers, and community partners. The Budget Narrative and the Project Timeline (Attachment No. 7) provide specifics on how these objectives are reflected in the budget and the timing of their implementation.

**Documenting and Monitoring Performance Metrics:** The GA-PRI Recidivism Reduction Project Coordinator will be responsible for collecting the relevant data and submitting quarterly performance metrics through BJA’s Performance Measurement Tool. The project coordinator will work closely with the project’s research partner, Applied Research Services (ARS), the GOTSR, all of the supervision agencies and providers, and the local pilot sites to design an efficient data collection and reporting system.
**The Project Research Partner:** For 20 years ARS has specialized in complex research design and analysis to support public policy, programming, and legislative decisions. ARS relies on state-of-the-art survey, analytical, data mining, simulation, and business intelligence tools to provide decision support and has extensive experience in analyzing corrections and court data for the purposes of designing risk/needs assessment instruments, developing population forecasting models, designing and evaluating interventions for correctional populations, planning future staffing needs and capital outlay, and working with problem solving courts. ARS has a rich history of competent, independent expertise in evaluating criminal justice policies, practices and programs. ARS typically employs an action-oriented, participatory, mixed-methods evaluation design. ARS was selected as the research partner for the project following state protocols due in part to it long-standing relationships with Georgia’s criminal justice agencies, including the development of the NGA. For this Project ARS will assist with data collection, problem assessment, and strategy development and will also conduct a comprehensive process and impact evaluation. (See Attachment No. 8 Evaluation Independence and Integrity).

The data collection plan will be finalized within the first 180 days of the grant period and will include a detailed process for the collection, analysis, and reporting of the required quantitative and qualitative performance measures. The project coordinator, with assistance from ARS, will develop reporting templates that each relevant stakeholder or agency will complete on a monthly or quarterly basis. The templates will include performance measures that are required by BJA as well as data relevant to the evaluation.

**Evaluating Recidivism Reduction Performance:** The evaluation of the Project will involve process (primarily formative), Fidelity of Implementation (FOI), and outcome evaluation components. Given the nascent nature of the Project, formative evaluation components will be
necessary to document the development and roll-out of the project. Through a combination of state and federal funds, the State of Georgia is funding a complete process and outcome evaluation of the post-release GA-PRI effort in five of the first six pilot sites (Bibb, Chatham, Fulton, Muscogee and Richmond Counties). One of the fundamental questions the evaluation will answer is whether a program aimed at connecting returning citizens with a team of community providers (employment, housing, and programming) in prison prior to release improves outcomes when compared to equally situated offenders who seek similar services post-release. This will entail collection of data regarding who makes what decisions and when, as well as recording the manner in which relationships, collaborative partnerships, and program functions and policies are initiated and established in the prison. Specific data collection activities during this phase of the evaluation will include the administration and completion of the Wilder Collaboration Factors Inventory (WCFI), a well-regarded measure of the development and strength of collaborative bodies which include the site coordinator, providers, institutional personnel, and probation/parole officers. Specific attention will be given to measuring the time required to connect returning citizens to community services in the in-reach pilot sites compared to non-pilot offenders (matched using propensity score matching methods). Once the initial start-up is underway it will be critical to ensure development of a complete inventory of providers and programs participating in the in-reach program using community scan and resource mapping methods. We will also ensure that a process is in place to identify Evidence-Based Practices (EBPs) among these providers and programs, using compendiums of EBPs including www.crimesolutions.gov and others. Part of this work will be establishing the capacity and throughput of the EBPs and matching to established capacity the projected return-from-prison (“pipeline”) data in each of the communities being served by the
grant. Given Georgia’s emphasis on the use of the Risk-Needs-Responsivity (RNR) model, we will ensure the ongoing appropriate matching of offenders to programs based on identified criminogenic risk and needs (using the validated NGA and TAPs) and in accordance with RNR principles. Referral processes and decisions will be monitored continuously to ensure appropriate matching. Another critical component of the evaluation concerns FOI. We will measure the degree to which delivery of EBPs is characterized by a high degree of fidelity, as even the best designed programs can and often do fail if not delivered with a high degree of fidelity. To that end factors such as program type, treatment dosage, and treatment intensity will be kept for each program, provider, and citizen ensuring that sufficient data regarding program participation will be available to interpret and understand differential outcomes. Given the formative nature of the evaluation and the nascent state of the Project the collection, recording, and reporting back of data will be a critical component of the overall success of the initiative. Evaluation data will be communicated in monthly bulletins, quarterly evaluation summaries, and comprehensive reports.

**Maintaining Political Support and Sustainability:** The unanimous support in the Georgia Legislature for Governor Deal’s criminal justice reform agenda represents a deep commitment to the improvements in prisoner reentry in Georgia. As explained in detail throughout the application, the structures that have been put into place – starting with the statutorily mandated Georgia Criminal Justice Reform Council – in both the legislative and executive branches, and including widespread involvement from the judiciary virtually guarantee continued political support as a result of the stakeholders meaningful and continual engagement as well as the funding and political will to sustain the project after federal funding ends. The Budget Narrative describes those aspects of the grant request which will be sustained by the state beginning in 2018 and includes virtually every aspect of this application.
Table 3. Statewide Recidivism Reduction Analysis

<table>
<thead>
<tr>
<th>Target Population</th>
<th>State Population</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Population</td>
<td>6,669</td>
</tr>
<tr>
<td>Recidivism Rate:</td>
<td>34.0%</td>
</tr>
<tr>
<td>Total Recidivists:</td>
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</tr>
<tr>
<td>Recidivism Rate:</td>
<td>30.0%</td>
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<tr>
<td>Total Recidivists:</td>
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<tr>
<td>Reduction (n):</td>
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<tr>
<td>Rate Reduction (%)</td>
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<tr>
<td>Reduction (n):</td>
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</tr>
<tr>
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<td>20.6%</td>
</tr>
<tr>
<td></td>
<td>20.6%</td>
</tr>
</tbody>
</table>


2 Data informing the analysis included crime, arrest, court disposition and recidivism rates and sentence lengths, offender characteristics, parole grant rates, time served in prison, probation/parole revocation rates, time served on community supervision.

3 The Urban Institute, Justice Reinvestment Initiative State Assessment Report, Georgia Case Study, January 2014.

4 Of the 14,821 returning citizens under community supervision, 2,259 returned on parole supervision, 8,728 returned under split sentences of parole then probation post-release supervision, and 3,834 maxed out of prison to probation supervision.

5 .01 percent are 19 years old and younger; 58 percent are between 20 and 39 years old.

6 Risk is defined here as risk to commit a new felony offense within 3 years of release.

7 Georgia HB 1176, 2012.

8 In order to monitor performance, Georgia is using a measurement tool developed with the assistance of the Vera Institute of Justice, which tracks JRI policy implementation activities, measurement outcomes, impacts and performance.

9 While HB 1176 did not include all recommendations put forth by the Special Council, it enacted considerable reform of Georgia’s criminal justice system. The codified bill creates degrees of burglary and forgery and levels of theft; revises penalties for simple drug possession; allows courts to order electronic monitoring; enables probation to impose graduated sanctions; requires the use of evidence-based practices and reinvests monies in evidence-based programming; requires quality assurance processes and accountability measures; streamlines information transfer; caps sentences to probation detention centers to ensure their effective use; and expands accountability courts and requires the adoption and implementation of a certification process for these courts.


12 For example, in September 2013, Georgia was approved for sub-award funding from the Bureau of Justice Assistance to hire a project manager to coordinate the electronic sentencing packet project between the GDC and the state’s superior courts; hire a system analyst and Java developers to program the presentence assessment and electronic sentencing packets; engage a consultant to provide technical assistance to the Presentence Risk and Needs Assessment Work Group; provide training sessions for staff on certification of the accountability courts; and fund peer review evaluation visits. The juvenile justice reforms are moving forward as laws and policies are now requiring that only the most serious and violent young offenders should be kept in custody through both the expanded requirements of HB 242 and the recently passed SB 365. Youth with misdemeanors and minor offenses will be diverted into specialized community-based programs aimed at managing their core problems that range from dysfunctional families, anger issues and underdeveloped basic life skills, to drug and alcohol abuse. Major changes to the juvenile justice code are expected to reduce both incarceration costs and the probability of reoffending. To enhance community-based programming, Georgia committed $5-million in state funds, plus another $1-million in federal grant money, to fund more of these community-based programs for our young offenders. The innovations of the Department of Juvenile Justice under *Juvenile Reinvestment* has banked needed program dollars into more than 44 counties, with more expected in 2014 and DJJ has been reorganized to enhance implementation performance. Under the adult justice reforms, the Administrative Office of the Courts has produced a comprehensive set of accountability court standards and outlined a process for peer review and certification; the Georgia Department of Corrections (GDC) has expanded its use of probation detention centers, residential drug treatment centers, and day reporting centers as an intermediate sanction for probation violators; probation detention centers have implemented a 180-day length-of-stay cap to ensure that the facilities are used only as an intermediate sanction; and the GDC and the State Board of Pardons and Parole (SBPP) are now using a new risk/needs assessment instrument.

13 Through FY 2013 budget initiatives that accompanied HB 1176, the Georgia General Assembly invested $11.6 million of averted savings for accountability courts; $5.7 million into new residential substance abuse treatment (RSAT) programs; and $175,000 to develop a front-end risk assessment tool and invested approximately $500,000 annually into reentry policy and program development and community resources for local planning, and an additional $550,000 for staff coordination positions to address housing.


15 The intention is to determine changes in the re-conviction and re-imprisonment rates for returning citizens that are stratified to allow analyses for differing rates based on level of risk. As a result, the risk levels of prisoners are expected to change over time and will be measured by a new “prison population risk tool” being developed.


In Georgia, post-release community supervision includes parole supervision as well as for some cases, who have concurrent active cases, probation and parole supervision, and for some cases, who max-out from prison, probation supervision.


Ibid.,10. Based on the Pew Report, the cohort of 16,951 prison releases from 1999-2002, 38% had a parole violation, a new crime that resulted in a return to prison (Pew’s definition of recidivism) compared to the 2004-2007 cohort of 18,972 who had a 34.8% recidivism rate. According to Georgia Department of Corrections data (7-15-13), the re-conviction rate of former prisoners has ranged from 28% in 2001 to the lowest in 10 years at 26.6% in 2010.


In order to effectively implement the Georgia Prisoner Reentry Initiative (GA-PRI) Framework and to educate and determine training needs, each service delivery department represented on the IST will form an Implementation Resource Team (IRT) led by an IST member and comprised of top level managers who are responsible for moving the GA-PRI Framework into the policies/procedures of their department and assuring that the Framework is fully understood and implemented at state and local levels. The IRTs are responsible for interpreting how their departments’ functions will need to be adapted to correspond with every aspect of the GA-PRI Framework and assuring efficient implementation and in so doing, educate stakeholders as well as determine more significant training needs. Active interaction between the IRT and the IST is critical for a clear understanding of the forces driving the development and implementation of the Framework. IRTs will propose solutions to their department directors on how to respond to the challenges that inevitably will arise as their departments’ reform their approaches to addressing the needs of citizens returning to Georgia’s communities so that crime in Georgia is reduced. Regular meetings of the departments’ IRTs will ensure that key policies, processes and functions are adapted, reformed and managed in a timely and coherent manner and that these changes are fully communicated throughout their agencies. The interaction between the IST and the emerging local Steering Teams represents another important opportunity to engage in problem identification, solution seeking and collaboration. The IST, IRTs and the local Steering Teams will meet periodically for education/training “Taking Action” meetings to address specific policy issues with the benefit of national/state best practices.

The five year recidivism rate reduction objectives for each of these groups of community sites include: (1) For the six sites in Phase One, a reduction of 28 percent (from 33 percent to 26 percent); (2) For the five sites in Phase Two, a 21 percent reduction (from 31 percent to 27 percent); and, (3) For the five sites in Phase Three, a 20 percent reduction (from 32 percent to 28 percent).

To estimate recidivism reduction, defined as the re-conviction rate, the planning group examined historical 12-60 month recidivism trends for arrest-for-any offense, arrest for-felony offense, reconviction, and return-to-prison. Special attention was given Georgia’s changing inmate composition and trends, risk-needs scores, programming/intervention plans, as well as experience with in other sites. These projections do not make any assumptions about low risk offenders in the 16 sites.

The recidivism impact results reflect just a single year of releases in these start-up years and do not represent the cumulative effective of releases in the subsequent years following implementation. Of Georgia’s 159 counties, these initial sites, selected for their population and high recidivism, represent 53% of all Georgia’s annual prison releases (10,880). The GA-PRI will target medium and high risk offenders which account for 6,669 returning citizens. This
reflects the target for just a single year of releases. Between 2014 and 2019, the Georgia PRI target population will include over 19,000 ex-inmates in the 16 sites.

ARS works on JRI with local jurisdictions, providing data analysis and building local population projection models and has built state correctional system simulation models in Alabama, Georgia, Missouri, South Carolina, Pennsylvania, Maryland, and Tennessee. ARS is currently supporting the Canadian correctional system to build a new forecast model.

ARS developed Georgia’s Parolee Re-Arrest Risk Instrument which updates each parolee’s risk score nightly based on the case management system data; built the correctional system simulation model to support Georgia’s JRI effort; conducted the only known time-in-motion study, using simulation technology to model a large state prison to guide architects and engineers in the re-design of Georgia’s diagnostic/classification prison, which annually processes over 21,000 inmates; and recently completed an evaluation of the implementation of Georgia’s Probation Options Management Act.

Meeting minutes and discussions with key stakeholders will also provide critical detail and context for this phase of our work, as well as inmate contact logs in the institution among the providers.

For example, questions will include: Does in-reach prior to release offer greater chance of service delivery? Does the operational expense of accessing inmates in the institution increase the likelihood of a successful provider-inmate service connection as well as the returning citizen being fully participatory with the available services?

For instance, ongoing data will be kept up-to-date regarding each participant’s compliance with programming and supervision to identify any issues early on, both in the lives of participants (providing for swift and certain responses) and for the proper functioning of the initiative. To that end, frequent and consistent evaluation feedback will be provided to key stakeholders in order to provide for a process of Continuous Quality Improvement.