

# Safe Streets Second Chances

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**TO:** **Nate Ristow, Advisor, Office of Governor Km Reynolds**

**RE:** **Iowa FOCUS Committee Recommendations**

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Thank you for allowing the Safe Streets and Second Chances Project (S3C) at Right On Crime to make recommendations to Governor Reynolds' FOCUS Committee on Criminal Justice Reform. S3C is a collaboration between Right On Crime and researchers at Florida State University's Institute for Justice Research and Development<sup>1</sup> to marry real-time academic research and policy reform in order to produce better criminal justice and reentry outcomes.

91% of those in Iowa Department of Corrections (IDOC) facilities will return to their communities, which illustrates the need for holistic reentry policy that can create a safer and more prosperous Iowa.<sup>2</sup> This memo will discuss the following three topics pertaining to Iowa reentry, and present operational recommendations to turn research and policy in to action.

**I. Identification**

ID Process  
Identification Procurement Element  
Costs

**II. Workforce**

Behind the Wall & Continuum to Release  
On-the-Job Training Program: Optimizing to Engage the Business Community  
Pre-Release Job Fairs & Interviews and Employer Outreach

**III. Behavioral Health**

The "Mid-State Model"  
Expand the Peer Support Specialist Program  
Expanding Treatment Capacity Through Connectivity

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<sup>1</sup> Florida State University's research reports can be found at <https://ijrd.csw.fsu.edu/publications/research-reports>

<sup>2</sup> FOCUS committee meeting on November 20, 2019

# Safe Streets Second Chances

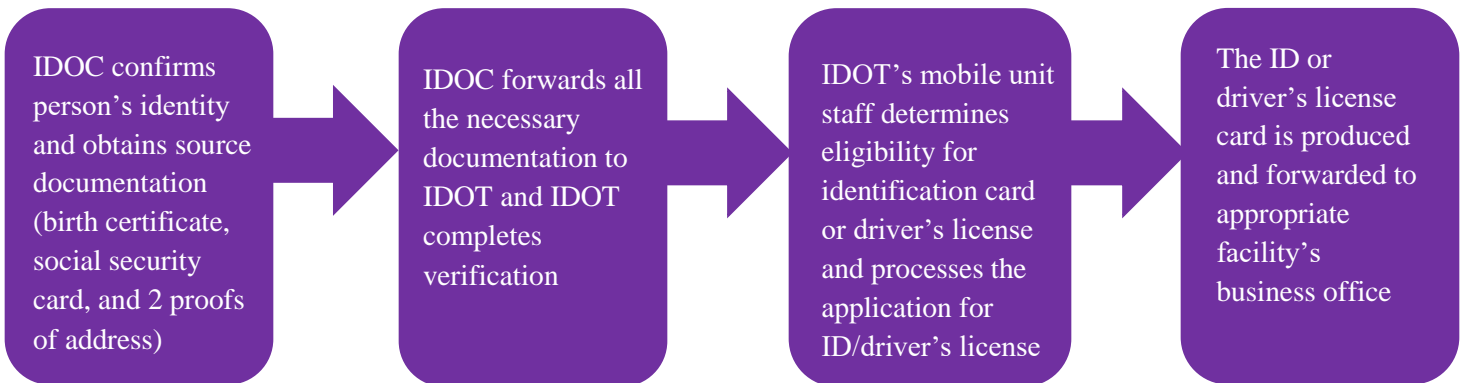
## I. Identification

S3C supports the Iowa Department of Transportation’s (IDOT) Motor Vehicles Division (DMV)’s recommendations provided to the FOCUS Committee on November 20, 2019 to provide funding for mobility managers in IDOC facilities to assist in critical document, identification, and driver’s license procurement. In addition, mobility managers are uniquely situated to help address burdensome fines and fees that prevent Iowans from accessing vital methods of transportation, and jobs.

Possessing a valid government-issued identification is integral for a successful transition into the community because it serves as a prerequisite for employment, housing, social benefits, community services, and different forms of aid. Our research partners found that one of the greatest challenges for reentry is the inability to get an ID or a driver’s license. Research participants reported that not having a birth certificate, a social security card, a state identification card, and/or a driver’s license hindered their ability to get a job.<sup>3</sup>

According to the reentry flow chart given to the FOCUS committee on November 7, 2019, IDOC does not currently provide identification upon release. In order to reduce this barrier, we recommend implementing policies for ensuring that released individuals leave incarceration with a birth certificate, a social security card, and a state-issued ID and/or a driver’s license. IDOC should prioritize identification through partnerships with the Iowa Department of Public Health (IDPH) and IDOT/DMV which should be formalized by MOUs. Providing identification upon release is a priority because it serves as a critical building block for other reentry initiatives, such as transportation and housing post-release, I-9 readiness and employment, and accessing healthcare and medication.

### ID Process:



<sup>3</sup>[https://ijrd.csw.fsu.edu/sites/g/files/upcbnu1766/files/media/images/publication\\_pdfs/5Key\\_QR2\\_Psychological\\_Toll\\_of\\_Reentry.pdf](https://ijrd.csw.fsu.edu/sites/g/files/upcbnu1766/files/media/images/publication_pdfs/5Key_QR2_Psychological_Toll_of_Reentry.pdf)

# Safe Streets Second Chances

## Identification Procurement Elements:

### 1. Birth Certificates

IDOC does not secure birth certificates upon release due to financial restraints. A birth certificate is the main document needed for establishing an identity and is issued by IDPH. The cost of an Iowa birth certificate is \$15 if ordered by phone, mail, or in-person. For online orders via VitalCheck, the price is \$24.<sup>4</sup> We recommend that IDOC and IDPH sign a MOU to solve this problem.

IDOC would be responsible for confirming the identity of the inmate. To reduce the funding barrier, the MOU can also include a provision for waiving the fees for birth certificates. For inmates born outside of Iowa, IDOC could not partner with IDPH. Instead, IDOC unit staff and/or a case manager should assist the inmate in obtaining the required information from the state where the inmate was born. The desirable timeline for procurement would be 24 months before any possible release date for current inmates and during intake for new inmates.

### 2. Social Security Cards

IDOC has a standing MOU with the Social Security Administration for producing social security cards for incarcerated individuals. IDOC should examine their current MOU with the Social Security Administration to ensure that it includes provision for initiating the issuance of the social security card at least 120 days prior to any possible release date. If the 120-day timeframe is not present in the MOU, then IDOC should consider entering into the *newest* MOU with the Social Security Administration to include this provision.<sup>5</sup> For cases outside the provisions of the MOU, the correctional staff should assist the inmate in contacting the local Social Security Administration Office and obtaining necessary documents.

### 3. Proofs of Address/Other Document Procurement

Iowa is REAL ID compliant with REAL IDs going into full effect starting on October 1, 2020, and the new document requirements present high hurdles for inmates and returning citizens. Iowa issues REAL ID-marked card for which a birth certificate and a social security card are essential along with two proofs of address.

As such, we advise IDOC to standardize the procedure for issuing birth certificates and social security cards to inmates prior to release and work closely with IDOT to determine alternative documents that would satisfy the REAL ID requirements and/or alter release documents to conform to REAL ID requirements. For instance, an official IDOC document could potentially serve as a “federal, State of Iowa or local government

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<sup>4</sup> <http://idph.iowa.gov/health-statistics/request-record>

<sup>5</sup> <https://secure.ssa.gov/apps10/poms.nsf/lnx/0110225145>

## Safe Streets Second Chances

document (such as a receipt, license, permit, assessment, or other document)” which is listed as a valid proof of address.<sup>6</sup> An additional proof of address could be the “[p]ay stub from your employer” for inmates who are paid for prison employment.<sup>7</sup> Establishing standards on required documents will entail a full interagency collaboration and establishment of formal agreements which would make Iowa a leader in this space.

#### 4. Identification Card/Driver’s License

After securing identity documents and proofs of address, the next step is getting an inmate an ID, IDOT. IDOC and IDOT should collaboratively establish standards for verifying an individual’s identity and ensuring that the ID issuance process is in compliance with IDOT’s requirements. All identification documents will be forwarded to the appropriate facility’s business office to be disbursed to the inmate upon release from the facility.

##### a. Access

IDOC reported a DMV Mobile Unit pilot program in Mitchellville. Thus, pursuing the option of using mobile units for ID procurement would be viable as the mobile unit collects all “ID ready” documents and then produces an actual card. Utilizing mobile units in IDOC facilities should be further developed.

S3C has seen increased deployment of DMV mobile units to serve prison populations across the country in states like Virginia with its DMV Connect program<sup>8</sup> and (S3C partner state) Florida with its Florida Licensing On Wheels (FLOW)<sup>9</sup> program. The mobile unit will need to visit more facilities to reach more individuals adequately scale. According to IDOT, 80% of inmates cannot receive valid driver’s licenses because they need to take the knowledge and driving skills tests.<sup>10</sup> However, inmates should leave prison with at least a non-driver ID through the mobile unit which would direct increase I-9 and job readiness.

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<sup>6</sup> <https://iowadot.gov/mvd/realid/success.aspx>

<sup>7</sup> Ibid.

<sup>8</sup> <https://www.governor.virginia.gov/newsroom/all-releases/2019/october/headline-847736-en.html>

<sup>9</sup> <https://www.flhsmv.gov/locations/florida-licensing-wheels-flow/>

<sup>10</sup> FOCUS Committee meeting on November 20, 2019

# Safe Streets Second Chances

Costs:

Document Type	Cost	Order Timeframe of any possible release date	Current MOU
Social Security Card	\$0	120 days	Yes
Birth Certificate	\$15 <sup>11</sup> or \$24 <sup>12</sup>	24 months	No
REAL ID/Driver's License	\$32 (ID only) and \$64 (Driver's License) <sup>13</sup>	Depending on the mobile unit schedule	No

*Iowa can Save Money by Implementing an ID Procurement Process*

Securing a state-issued REAL ID/driver's license (depending on eligibility) presents some operational challenges, but could lead to direct cost savings. The current costs for a non-driver ID is \$32, and a driver's license is \$64.<sup>14</sup> While these costs may seem steep, it is important to compare them to the cost of housing those on post-release supervision in community-based corrections (CBC) residential facilities, which averages \$74.66 per day.<sup>15</sup> The one-time cost of securing ID for returning citizens pre-release could save IDOC money by reducing the amount of days individuals spend in CBC housing.<sup>16</sup>

The following graphics visualize the possible savings from issuing identification vs. the amount spent on residents in CBC residential custody. The average cost per day at a residential CBC facility is \$74.66.<sup>17</sup>

The *first graphic* outlines the cost of identification (\$79 for an ID and a birth certificate). The *second graphic* illustrates the amounts for total anticipated costs during a stay in residential CBC upon 15, 30, 45, and 60 days. The *third graphic* examines total savings accrued if an individual would have identification, thus presumably reducing the time spent at a CBC facility, as opposed to cost incurred by the stay at residential CBC facility without ID. The *fourth graphic* examines the total possible savings for the 60 people (who may not have had identification) housed at a residential CBC facilities as of July 1, 2019.<sup>18</sup>

For the purpose of this memo, we have calculated the cost with the adjusted number of 60 (number of individuals housed in CBC facilities as of July 1, 2019), excluding the following

<sup>11</sup> If ordered in-person, by mail, or by phone

<sup>12</sup> If ordered by online through VitalCheck

<sup>13</sup> Usually issued for a duration of 8 years at \$4.00 and \$8.00 per year respectively for ages 18 through 66.

<https://iowadot.gov/mvd/driverslicense/renew#Expiration>

<sup>14</sup> IDOT <https://iowadot.gov/mvd/driverslicense/renew#Expiration>

<sup>15</sup> [https://doc.iowa.gov/sites/default/files/documents/2019/11/fy2019\\_doc\\_annual\\_report.pdf](https://doc.iowa.gov/sites/default/files/documents/2019/11/fy2019_doc_annual_report.pdf), page 28.

<sup>16</sup> If a person is ID ready and job ready, they should progress through residential programming faster than if they arrive with no identity documents and the residential facility must work to obtain them.

<sup>17</sup> [https://doc.iowa.gov/sites/default/files/documents/2019/11/fy2019\\_doc\\_annual\\_report.pdf](https://doc.iowa.gov/sites/default/files/documents/2019/11/fy2019_doc_annual_report.pdf), page 28.

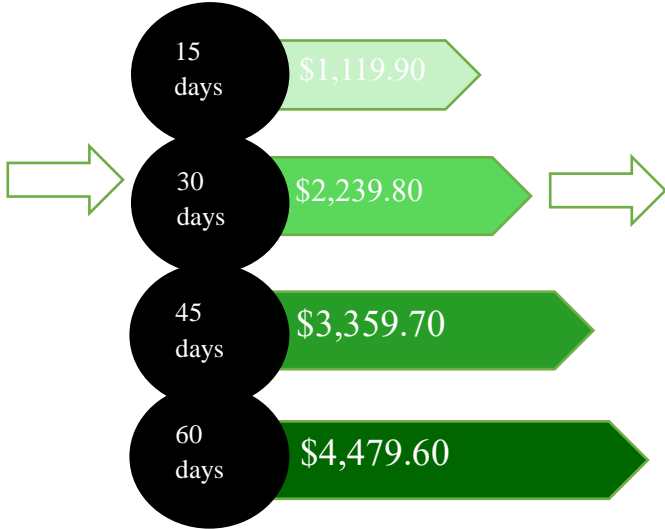
<sup>18</sup> Ibid, page 17.

# Safe Streets & Second Chances

populations because we presumed they would already have identification: OWI Continuum (34), Work Release (110), and Probation (68). Assuming IDOC is paid for housing federal inmates, some costs may be offset.

## Cost of CBC Residential Stay

Cost:  
 ID \$64  
 +  
 BC \$15  
 -----  
 \$79 one-time  
 identification cost  
 per person



## Savings per person

Per day	- \$4.34
15 days	+ \$1040.90
30 days	+ 2160.80
45 days	+ 3280.70
60 days	+ 4400.60

60 possible people  
 in CBC residential  
 custody, costs per  
 duration of stay



15 days	\$67,194
30 days	\$134,388
45 days	\$201,582
60 days	\$268,776

# Safe Streets Second Chances

## Mobility Managers in IDOC Facilities

S3C echoes the recommendations made by IDOT to hire DOT “mobility managers” for IDOC facilities to assist inmates with obtaining identity documents, IDs and driver’s licenses. S3C also supports the DMV exploring ID and driver’s license fee reductions and/or waivers for this population.

As mentioned in IDOT’s presentation to the FOCUS Committee, several Iowa counties offer payment plan options for those with outstanding fines and fees. S3C recommends that these county services be highlighted by IDOC and potential “mobility managers,” so that individuals could be set up on a repayment plan pre-release.

## *Broader Administrative/Cabinet Considerations*

Further, placing a “hold” on all driver’s license and ID suspensions caused by fines, fees, and court penalties would allow returning citizens the opportunity to drive to work and pay off any balance. This is probably even more important in the more rural areas of the state. Iowa should also examine the fines, fees, and court penalties system in the state and reduce suspensions to apply only to those that pose driving-related safety risks.

## Resolving Fines and Fees

Many individuals are also affected by unpaid court fines, various fees, civil penalties, or other financial obligations that prevent them from securing a driver’s license. Nationally, there are more than 11 million debt-related driver’s license suspensions, with 55.2 unresolved suspensions per 1,000 people of driving age in Iowa alone.<sup>19</sup> Approximately 80%<sup>20</sup> of Iowans are being released from IDOC custody without a driver’s license and roughly half of inmates (approximately 4,238)<sup>21</sup> have unpaid court fines and/or IDOT civil penalties owed before being able to obtain a license.

## *Obligation Reports*

As a result, further cooperation with IDOT and legal providers is necessary to get these barriers eliminated. The first step is to obtain obligation reports from IDOT/DMV. Obligation reports are DMV documents that show every hold on a person’s driver’s license. For the reentry population, many of those holds will be for unpaid fines and fees. These holds are typically accurate indicators of existing bench warrants that will show up on a detainer check with IDOC prepares an inmate for release. In most states, these reports list the court, amount owed, and relevant dates and/or docket numbers, as well as all financial liabilities that need to be satisfied in order to obtain/restore an ID/driver’s license.

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<sup>19</sup> <https://www.freetodrive.org/maps/#page-content>

<sup>20</sup> FOCUS Committee meeting on November 20, 2019

<sup>21</sup> [https://doc.iowa.gov/sites/default/files/documents/2019/11/fy2019\\_doc\\_annual\\_report.pdf](https://doc.iowa.gov/sites/default/files/documents/2019/11/fy2019_doc_annual_report.pdf), page 20.



## Safe Streets Second Chances

IDOC and IDOT should review these obtain obligation reports together and develop a plan to resolve the listed obligations. In this case, IDOC would identify eligible participants and secure obligation reports with all outstanding obligations from IDOT. Obligation reports should be generated at the same time IDOC applies for social security card applications to standardize workflow (at least 120 days prior to any possible release date).

Other states, such as New Jersey, have been successful with obtaining obligation reports and driver's license restoration for returning citizens. Specifically, the New Jersey Reentry Corporation (NJRC)<sup>22</sup> was able to obtain obligation reports and hence identify unresolved financial obligations that resulted in driver's license suspension and address them accordingly with the help of a pro-bono network of lawyers. This was only successful because the Chief Administrator of the NJMVC, Raymond Martinez, was excited about reentry and developing partnerships. The result was over 400 restored drivers' licenses between 2015 – 2017.



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<sup>22</sup> John Koufos was the Executive Director of NJRC, and built their ID/DL pro bono program. Shae Cali was NJRC's Clinical Director.



*Detainers*

Additionally, it would be beneficial to collaborate with the county Sheriff's offices in resolving detainers through a designated point of contact (POC). The detainer system has many deficiencies and addressing them requires interagency collaboration to protect public safety and maximize reentry results.

*Resolving the Fines, Fees and Detainers*

Partnering with a law school or a pro bono legal service provider can help resolve these issues in order to reinstate driver's licenses, clear warrants/detainers, and make individuals employable. This could be done during incarceration to resolve these issues before inmates are released. The work at Mitchellville can be scaled with these types of partnerships. The obligation reports are critical since they serve as the roadmap for the legal service provider.

**II. Workforce: Connecting Returning Citizens to Training and Jobs**

The S3C research team has found that employment trends for the reentry population favor jobs that pay low wages, such as in food industry, hospitality, and seasonal work. However, with the right tools and coordinated services, Iowa can leverage multiple state agencies to help build careers. Through training behind-the-wall and reentry services as they rejoin society, returning citizens can qualify for and obtain better jobs that truly improve their quality of life, leading to reduced recidivism and safer communities.

S3C supports Iowa Workforce Development (IWD)'s recommendations to provide funding for an additional reentry advisor in four correctional facilities.<sup>23</sup> This will expand behind-the-wall training and the ability to make referrals to wrap around services.

Behind the Wall & Continuum to Release

IWD and IDOC detailed their work and collaboration to connect inmates with education and training pre-release, and help find jobs for returning citizens post-release.<sup>24</sup> As with many states, there are an abundance of open positions in Iowa, and not enough skilled workers to fill them.<sup>25</sup> Returning citizens can serve as ideal resources to fill these positions in Iowa high demand industries such as construction and advanced manufacturing, if they are provided with training and certificates.<sup>26</sup> While IDOC currently offers HiSET completion opportunities and twenty-four certified apprenticeship programs, S3C recommends that IDOC expand access to educational opportunities, so more inmates can learn skilled trades.<sup>27</sup>

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<sup>23</sup> FOCUS Committee Meeting on November 20, 2019

<sup>24</sup> FOCUS Committee Meeting on November 20, 2019

<sup>25</sup> [https://www.iowaworkforcedevelopment.gov/sites/search.iowaworkforcedevelopment.gov/files/documents/2018/SatusIowaWorkforce10\\_2019.pdf](https://www.iowaworkforcedevelopment.gov/sites/search.iowaworkforcedevelopment.gov/files/documents/2018/SatusIowaWorkforce10_2019.pdf)

<sup>26</sup> <https://www.iadg.com/iowa-advantages/target-industries/>

<sup>27</sup> [https://doc.iowa.gov/sites/default/files/documents/2019/11/fy2019\\_doc\\_annual\\_report.pdf](https://doc.iowa.gov/sites/default/files/documents/2019/11/fy2019_doc_annual_report.pdf)

# Safe Streets Second Chances

## *Expanding Access to Education*

In 2019, 300 individuals in IDOC facilities completed educational requirements to receive their High School Equivalency Test (HiSET).<sup>28</sup> In order to increase educational opportunities for inmates, the DOC could partner with Iowa colleges and universities to offer practicums for graduate students in education to teach additional HiSET courses. With the increased access to classes for inmates, the DOC could then increase the amount of HiSET exams offered, giving more individuals the opportunity to pursue education behind the wall.

## *Optimizing Apprenticeships and Connecting to IowaWORKS*

Apprenticeships are probably the best services that IWD can provide as a direct pathway to the middle class. However, there will never be enough apprenticeship training to serve every inmate, and not every inmate will be appropriate for apprenticeship training. The majority of inmates will need to connect with IowaWORKS services upon release, and IWD can help streamline this pathway to employment.

IowaWORKS can provide some of the following services behind the wall:

- a. Work with the Selective Service System to expedite and ensure Workforce Innovation and Opportunity Act (WIOA) eligibility;
- b. Provide Test of Adult Basic Education (TABE) (or equivalent) skill level testing to determine specific training eligibility or remedial offering (i.e. Workforce Learning Link);
- c. Ensure High School Diploma/Equivalency/GED training and testing (GED is its own Industry Recognized Credential);<sup>29</sup>
- d. Pre-classify inmates to a WIOA category and provide an appointment date and time at the OSCC/AJC with discharge paperwork;
- e. Create a prerelease file in America's One-Stop Operating System (AOSOS), or the data system IowaWORKS currently uses.

IDOC identified adding new apprenticeship programs as a future goal in its latest annual report.<sup>30</sup> S3C recommends that IDOC collaborate with IWD to determine which of Iowa's 270 High Demand and High Growth Occupations as listed in IWD's composite data could become new apprenticeship programs.<sup>31</sup>

The S3C research team identified an enrollment delay for returning citizens in job training programs.<sup>32</sup> An optimized workforce system with reentry advisors can ensure inmates' expectations are managed and they can enroll in available programming

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<sup>28</sup> Ibid

<sup>29</sup> For a more detailed discussion of GED training in IDOC facilities, please see page 10 of this memo.

<sup>30</sup> [https://doc.iowa.gov/sites/default/files/documents/2019/11/fy2019\\_doc\\_annual\\_report.pdf](https://doc.iowa.gov/sites/default/files/documents/2019/11/fy2019_doc_annual_report.pdf)

<sup>31</sup> <https://www.iowaworkforcedevelopment.gov/2012-2022-high-demand-and-high-growth-occupations>

<sup>32</sup> 5Key Second Report – February 2019, page 17.

### Pre-Release Checklist

The pre-release process should aim to release a person prepared as possible for engaging with job resources. A pre-release checklist should include:

- Ensure clients are registered with Selective Service to expedite and ensure WIOA eligibility
- Register clients with IowaWORKS
- TABE (or equivalent) skill level testing to determine specific training eligibility or remedial offering
- Ensure HiSET training and testing
- Filter inmates into an appropriate WIOA category and schedule them for an appointment date and time at an IowaWORKS center post-release

### On-the-Job Training Program: Optimizing to Engage the Business Community

The On-the-Job Training (“OJT”) program is a federal labor program in which employers agree to hire workers from certain groups and in turn the State DOL (using USDOL funds) reimburses 50% or more of an employee’s wages for a specific period of time. For an example, Iowa’s Region 1 OJT program allows for a reimbursement maximum of \$5,000 or six months depending on the current skills and the skills required in the new job.<sup>33</sup> This is a great tool to incentivize the business community to vet prospective employees in a controlled setting before permanently hiring the most qualified candidates at a competitive wage. Few states publicly claim to be effectively leveraging OJT contracts for returning citizens, even though they are a targeted group as defined by USDOL under “ex-offenders.”

Both Iowa inmates and employers can benefit from employers utilizing the prison/reentry population to fill skill gaps in their pool of eligible employees. For example, industries that have difficulty finding eligible employees among the general population can train inmates to meet these needs. This could come in the form of OJT positions originating inside state prisons with actual employment extending into the prison environment, or in the form of training and credentials with the promise of employment upon release.

With only 13,935 ex-offenders in any type of WIOA<sup>34</sup> professional training service, there must be considerably less in OJT. Like any system that the private sector is expected to use, it must be streamlined so it does not interfere with business operations. In addition, returning citizens

<sup>33</sup> <https://www.iowawdb.gov/sites/search.iowawdb.gov/files/documents/Attach.%20F8%20-%20%20OJT%20Policy.pdf>

<sup>34</sup> National Quarterly Report, Para. (C), at [https://www.doleta.gov/performance/results/Quarterly\\_Report/2017/Q3/WIOA\\_Adult3\\_31\\_2018Rolling\\_4\\_Quarter\\_sNQR.pdf](https://www.doleta.gov/performance/results/Quarterly_Report/2017/Q3/WIOA_Adult3_31_2018Rolling_4_Quarter_sNQR.pdf)

# Safe Streets Second Chances

should be targeted for OJTs in specific industries with IWD taking the lead to ensure client engagement.

## a. Suggestions for Programmatic Expansion

1. The process of generating OJT contracts should be simplified for the business community to encourage their participation. The current OJT process varies somewhat by jurisdiction, but resources could be devoted to Workforce Development Areas (WDAs) that streamline the process. For example, employers should be able to access OJT applications through a simplified online portal and WDAs should be rewarded if they produce larger numbers of OJT contracts for ex-offenders.
2. Registered apprenticeships should be a major focus of the OJT program through partnerships with the building trades and related apprenticeship programs.
3. The OJT process could begin while an inmate is serving time in a prison system, where appropriate. This could be accomplished through work-release programs, or with industries paying living wages operated inside a prison. For example, a prison could partner with an advanced manufacturer and inmates could earn living wages and credentials through the OJT program while incarcerated. These living wages would help pay restitution, fines, child support, and other obligations.

## b. Specific WIOA Programs for Returning Citizens

Nationally, approximately 50,536 “ex-offenders” received some type of WIOA service from April 2017 - March 2018.<sup>35</sup> However, only 13,935 ex-offenders received *any* type of professional training services (not solely in the form of OJT) during that same period.<sup>36</sup> For example, a person can receive initial WIOA services without progressing to professional training services.

## c. General Eligibility Requirements and Employer Considerations

“Ex-offenders” qualify for WIOA funds based solely on their status.<sup>37</sup> WIOA defines an “offender” as an adult or juvenile

- (A) who is or has been subject to any stage of the criminal justice process, and for whom services under this Act may be beneficial; or

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<sup>35</sup> National Quarterly Report, Para. (C), at [https://www.doleta.gov/performance/results/Quarterly\\_Report/2017/Q3/WIOA\\_Adult3\\_31\\_2018Rolling\\_4\\_Quarter\\_sNQR.pdf](https://www.doleta.gov/performance/results/Quarterly_Report/2017/Q3/WIOA_Adult3_31_2018Rolling_4_Quarter_sNQR.pdf)

<sup>36</sup> Id.

<sup>37</sup> 29 U.S.C. 3102(24)(F). All persons seeking to qualify for the OJT program must fit into an eligible WIOA category. To that end, they must be an “individual with a barrier to employment” as defined in 29 U.S.C. 3102.

## Safe Streets Second Chances

- (B) who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.<sup>38</sup>

“OJT is provided under a contract with an employer or registered apprenticeship program sponsor in the public, private non-profit, or private sector. Through the OJT contract, occupational training is provided for the WIOA participant in exchange for the reimbursement, typically up to 50 percent of the wage rate of the participant, for the extraordinary costs of providing the training and supervision related to the training. In limited circumstances ... the reimbursement may be up to 75 percent of the wage rate of the participant.”<sup>39</sup> An employee subject to an OJT contract should be learning new technologies, production or service procedures, or may be upgrading to new jobs that require additional skills, workplace literacy, or other appropriate purposes.<sup>40</sup>

As noted in the Iowa Unified State Plan, the OJT program facilitates long-term employment, which is very desirable for returning citizens seeking stability.<sup>41</sup> Currently, Iowa’s Region 1 OJT Policy document only advertises that up to 50% of training hours are reimbursed.<sup>42</sup> Incentives above 50% reimbursement are possible by combining a partner program such as the Trade Adjustment Assistance (TAA) Program, available for returning citizens once they are no longer incarcerated, with WIOA’s reimbursement. Iowa’s Region 1 should change the OJT policy document to reflect that under certain circumstances, employers may be eligible for greater reimbursement. Finally, educating employers about the OJT program will make it more attractive and encourage more employers to hire returning citizens. S3C is working nationally on this issue and would be happy to assist Iowa in further operational planning and implementation.

### *Connecting to IowaWORKS Post-Release*

If suitable connections cannot be made during incarceration, connections to American Job Centers (AJCs)/IowaWORKS Centers post-release should be a priority. AJCs are the places where any unemployed or underemployed person can go to sign up for job training or placement and they should be viewed as a vital partner in training and preparing returning citizens for the workforce. AJCs provide a number of services that include online job search tools, resume assistance, and the ability to pay for training programs (including OJT) and often supervise and verify “work activity” compliance for people receiving social service benefits (SNAP, GA, Medicaid, etc.). AJCs also assess the person’s reading and math levels for training eligibility, often by administering the Test of Adult Basic Education (TABE). All training programs are intended to result in at least one industry-recognized credential and subsequent job placement. In addition to OJT, other employer-focused programs include [federal bonding](#) and the [Work Opportunity Tax Credit \(WOTC\)](#). These programs can be highlighted by IowaWORKS to attract more employers.

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<sup>38</sup> 29 U.S.C. 3102(38)(A) and (B)

<sup>39</sup> 20 C.F.R. 680.700

<sup>40</sup> 20 C.F.R. 680.70(c)

<sup>41</sup> Iowa Unified State Plan, FY-2018, page 295.

<sup>42</sup> <https://www.iowawdb.gov/sites/search.iowawdb.gov/files/documents/Attach.%20F8%20-%20%20OJT%20Policy.pdf>

Parole offices can and should connect parolees on the streets or in halfway houses to AJC services to maximize successful transition. IDOC can also work to promote collaboration between IowaWORKS Centers and parole offices. Indeed, reentry advisors can ensure that a reentry plan is incorporated in to the parole conditions. At that point, IWD and the Iowa Board of Parole can establish a process to execute and optimize the reentry plan to maximize employment and minimize pitfalls for technical violations.

This process may help reduce technical parole violations, since finding employment is a near-universal parole condition. As such, parolees could be mandated to participate in state DOL services through the local AJCs to promote engagement. There is also a high probability that parolees can increase their access to other social services through the AJC. Importantly, by optimizing the job training offerings, Iowans who are receiving certain types of social service benefits/assistance will move toward self-sufficiency faster. This helps ensure that the limited resources in social safety nets are used as intended.

#### Pre-Release Job Fairs & Interviews and Employer Outreach

S3C supports the employment and job fairs the IDOC and IowaWORKS have organized to connect returning citizens to employers. S3C encourages the recommendation made by IowaWORKS to increase technology and security in Iowa prisons so that online job fairs and employer interviews can increase. IWD noted that increasing from four Reentry Advisors to eight would nearly double their capacity of clients from approximately 2,000 to 4,000. Increased technology and security, as well as additional Reentry Advisors, should greatly increase capacity for touchpoints for inmates pre-release.

In addition, the Society for Human Resources Management (SHRM) has an initiative called Getting Talent Back to Work, a national pledge of SHRM affiliated organizations to commit to changing their recruiting practices to give opportunities to people with criminal backgrounds.<sup>43</sup> The pledge is backed by an initiative with extensive resources that may be used by businesses and HR leaders to evaluate applicants.<sup>44</sup> Currently, associations and companies representing more than sixty percent of the U.S. workforce have taken the pledge. We recommend encouraging Iowa businesses to sign onto this pledge to show their support of second-chance hiring.

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<sup>43</sup> [https://www.gettingtalentbacktowork.org/wp-content/uploads/2019/01/GettingTalentBackToWork\\_Pledge.pdf](https://www.gettingtalentbacktowork.org/wp-content/uploads/2019/01/GettingTalentBackToWork_Pledge.pdf)

<sup>44</sup> [https://www.gettingtalentbacktowork.org/?\\_ga=2.201370321.154144156.1575490241-374008228.1575490241#resources](https://www.gettingtalentbacktowork.org/?_ga=2.201370321.154144156.1575490241-374008228.1575490241#resources)



### III. Behavioral Health: Connecting Incarcerated Individuals to Mental Health Services

Both the FOCUS committee members and IDOC have expressed a strong need for expanding mental health treatment within the correctional systems. One of the most significant service gaps discussed by the group is regarding the dearth of treatment options for inmates with substance use disorder (SUD) and other mental health conditions. The S3C research team has documented distressing results when mental health treatment is deficient for the justice-involved population.<sup>45</sup> While Iowa has already made major strides towards improving their treatment rate since 2015 (when 90% of inmates were released without treatment) the present rate of 64% remains high and a cause for concern. We look forward to assisting the State of Iowa in this area.

#### The “Mid-State Model”<sup>46</sup>

There may be a model at Mid-State Correctional Facility (MSCF) in New Jersey worth replicating in Iowa. Given that 70% of state inmates have a substance use disorder on average, and that 64% of those inmates in Iowa are not receiving treatment while under IDOC custody, and how high the risk of overdose death is post-release, the “Mid-State Model” has potential utility for Iowa. MSCF was the New Jersey’s first state prison with a licensed, clinically-driven treatment facility with a capacity of 696 beds.<sup>47</sup> NJDOC offers an additional 1,300 beds through its halfway houses.<sup>48</sup>

Under Governor Chris Christie, MSCF, a medium-security prison, was closed in 2014 and subsequently re-opened in 2017 as a treatment facility for people in New Jersey state prisons who have substance use disorders. The facility is licensed by the State of New Jersey, just as a residential addiction rehabilitation center would be, and utilizes evidence-based treatment such as medication-assisted treatment, commonly known as “MAT.” The program also utilizes group and individual treatment, peer support, and family support programs, in addition to helping with release planning and continuity of care.<sup>49</sup> They incorporate a peer mentorship program which has similarities with the Iowa peer program. A similar 60 bed<sup>50</sup> SUD treatment program for female inmates was also opened at NJDOC’s’ Edna Mahan Correctional Facility. Governor Christie was able to work successfully with the legislature, the cabinet, and the parole board to help implement the project which is innovative and scientifically grounded. In its first year of operation it served 345 male inmates with opioid use disorder.

The Mid-State program fills an enormous gap in treatment for people in prison with substance use disorders who did not qualify for drug court and were sent to incarceration with no option for diversion and corresponding court-mandated and subsidized treatment.<sup>51</sup> Many individuals with

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<sup>45</sup>[https://ijrd.csw.fsu.edu/sites/g/files/upcbnu1766/files/media/images/publication\\_pdfs/When\\_Death\\_Follows\\_Release.pdf](https://ijrd.csw.fsu.edu/sites/g/files/upcbnu1766/files/media/images/publication_pdfs/When_Death_Follows_Release.pdf)

<sup>46</sup> [https://njdoc.gov/pdf/annual\\_report/2018-Final%20NJDOC%20Annual%20Report.pdf](https://njdoc.gov/pdf/annual_report/2018-Final%20NJDOC%20Annual%20Report.pdf)

<sup>47</sup> [https://www.njleg.state.nj.us/legislativepub/budget\\_2017/DOC\\_response.pdf](https://www.njleg.state.nj.us/legislativepub/budget_2017/DOC_response.pdf)

<sup>48</sup> [https://www.njleg.state.nj.us/legislativepub/budget\\_2017/DOC\\_response.pdf](https://www.njleg.state.nj.us/legislativepub/budget_2017/DOC_response.pdf)

<sup>49</sup> <https://www.njspotlight.com/2018/08/18-08-08-state-expands-addiction-treatment-for-prisoners/>

<sup>50</sup> [https://www.njleg.state.nj.us/legislativepub/budget\\_2017/DOC\\_response.pdf](https://www.njleg.state.nj.us/legislativepub/budget_2017/DOC_response.pdf)

<sup>51</sup> [https://www.nj.com/news/2018/05/you\\_havent\\_seen\\_this\\_before\\_first\\_rehab\\_prison\\_giv.html](https://www.nj.com/news/2018/05/you_havent_seen_this_before_first_rehab_prison_giv.html)



## Safe Streets Second Chances

substance use disorders are statutorily or programmatically barred from drug court or halfway house placement due to the nature of their offense.

That being said, violent offenses can still be related to a root cause of substance use disorder and/or co-occurring mental illness, which Iowa wisely recognizes. In addition, before this model could be implemented in Iowa, there must be a solution for conducting treatment-focused intake assessments, or there will be no way to identify who should benefit from programming and treatment.

### Expanding the Peer Support Specialist Program

We commend IDOC for creating a peer-to-peer support specialist program to address unmet psychosocial needs among the population, which has been in operation for about five years and works in collaboration with the mental health community and NAMI. This program should be maintained and potentially expanded. In addition, if not being done already, a recidivism study on those participating in the program should be conducted to aid in creating a case for ongoing funding and/or expansion. If a treatment facility were to be opened, the peer support specialists could be an enhancement.

### Expanding Treatment Capacity Through Connectivity

Of additional note is the severe mental health provider shortage in Iowa, discussed by multiple stakeholders in the FOCUS group, which impacts the state's ability to recruit providers for the incarcerated population.<sup>52</sup> It also impacts post-release care and vulnerable population's access to care. An option to address this systemic barrier, if not being done already, could be to utilize graduate students in clinical programs. This could help address the risk/need assessment gap at intake, and also assist with psychoeducational and group programming. Students could be deployed to facilities closer to their schools or residences. The following schools offer MSW or PhD in psychology programs in Iowa:

- The University of Iowa
- University of Northern Iowa
- Clarke University
- St. Ambrose University
- Iowa State University

We commend Iowa for working to improve their Medicaid enrollment processes and policies and their commitment to quality improvement. Connectivity to these health services are vital for returning citizens, and the S3C research team has found that lack of access to services such as Medicaid can have dire consequences, especially for those that suffer from chronic illness.<sup>53</sup> The Medicaid enrollment program should be continually analyzed for quality improvement to promote continuity of care which will likely help to reduce state recidivism. In addition, it may

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<sup>52</sup> <https://dhs.iowa.gov/sites/default/files/Mental-Health-Professional-Shortage-Area-Overview.pdf?120920191311>

<sup>53</sup> [https://ijrd.csw.fsu.edu/sites/g/files/upcbnu1766/files/media/images/publication\\_pdfs/When\\_Death\\_Follows\\_Release.pdf](https://ijrd.csw.fsu.edu/sites/g/files/upcbnu1766/files/media/images/publication_pdfs/When_Death_Follows_Release.pdf)

## Safe Streets Second Chances

be worth considering data-sharing agreements with the state Medicaid agency and relevant managed care organizations to promote tighter linkages to care for those with significant mental health needs. MCOs sometimes have latitude to conduct pre-release or re-enrollment services if the individual is eligible for Medicaid.

### Conclusion

Thank you for the opportunity to offer insight into the exciting work in Iowa, and we look forward to making additional recommendations. In addition, we are happy to engage in further operational discussions and assist with implementation wherever we can add value.