

**OFFICE ON RETURNING CITIZEN
AFFAIRS**



REPORT OF INSPECTION

**DANIEL W. LUCAS
INSPECTOR GENERAL**

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General



Inspector General

September 23, 2015

Charles Thornton
Director
Office on Returning Citizen Affairs
2100 Martin Luther King Jr. Avenue, S.E.
Washington, D.C. 20020

Dear Mr. Thornton:

My Office has completed its inspection of the Office on Returning Citizen Affairs. The final report is enclosed.

Please use the enclosed Compliance Forms to report to the OIG actions taken on each recommendation and ensure that the forms are returned by the dates noted on them.

If you have questions or comments concerning this report or other matters related to the inspection, please contact me or Edward Farley, Assistant Inspector General for Inspections and Evaluations, at (202) 727-2540.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Lucas".

Daniel W. Lucas
Inspector General

DWL/lm

Enclosure

cc: See Distribution List

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**GOVERNMENT OF THE DISTRICT OF COLUMBIA
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- prevent and detect corruption, mismanagement, waste, fraud, and abuse;
- promote economy, efficiency, effectiveness, and accountability;
- inform stakeholders about issues relating to District administration and operations; and
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EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

Executive Summary

In fiscal year (FY) 2015, the Office of the Inspector General's (OIG) Inspections and Evaluations Division conducted an inspection of the Office on Returning Citizen Affairs (ORCA).¹ ORCA, as a provider of returning citizen services, was part of the OIG's FY 2015 focus on improving the efficiency and effectiveness of municipal services that are vital to District residents and other stakeholders. The OIG identified this inspection project in its *Fiscal Year 2015 Audit and Inspection Plan*.²

D.C. Code § 24-1302 establishes ORCA as the lead agency for coordinating and monitoring service delivery to citizens returning to the District following incarceration. D.C. Code § 24-1302 mandates that ORCA make recommendations to the Mayor in order to promote the general welfare, empowerment, and reintegration of returning citizens in the areas of employment and career development, health care, education, housing, and social services.

The OIG inspection team conducted this inspection with two overall objectives. The first objective was to assess ORCA's organization, management, level of expertise, and the services delivered to its clients. The second objective was to make recommendations for improving ORCA's operations and communications with District stakeholders.

The OIG inspection team concluded that ORCA lacked fundamental organizational mechanisms and resources necessary for: (1) ensuring that District residents incarcerated in local jails and federal prison facilities were knowledgeable of the District's re-entry resources, and (2) collaborating with District entities that offer post-release services that were critical to returning citizens' successful reintegration.

The inspection team found that while ORCA's staff worked diligently to provide direct services and client referrals, key organizational elements necessary to fulfill its overall mission, goals, and duties as established by D.C. Code § 24-1302(b) were not in place. Additionally, as a result of ORCA's failure to coordinate and monitor services provided by District agencies and community-based organizations, there were greater inefficiencies in advocacy and service delivery to returning citizens.

To assist ORCA in achieving its statutory requirements, this report of inspection makes 12 recommendations. The first six recommendations are designed to help ORCA improve the efficiencies of its internal organization, management, staff expertise, service delivery, and communication. The remaining six recommendations are designed to help ORCA improve its external effectiveness in collaborating with the Mayor, District and federal government agencies, and private organizations. In its response to the draft report, ORCA agreed to seven out of the 12 recommendations. ORCA's verbatim comments to each recommendation are included in the *Findings and Recommendations* section of this report.

¹ See Appendix 1 for a list of report acronyms and abbreviations.

² Available from <http://oig.dc.gov>.

**BACKGROUND, OBJECTIVES, SCOPE
AND METHODOLOGY**

BACKGROUND, OBJECTIVES, SCOPE AND METHODOLOGY

This *Office on Returning Citizen Affairs Report of Inspection* is divided into two sections. The first section of this report includes the background, objectives, scope and methodology of the inspection. The second part of this report includes the inspection's findings and recommendations.

The Background, Objectives, Scope and Methodology section discusses ORCA's responsibilities as defined in its enabling legislation located at D.C. Code § 24-1302, ORCA's collaboration with other District government organizations, as well as the team's methodology used to evaluate ORCA's compliance with D.C. Code requirements.

The Findings and Recommendations section of this report presents analysis and recommendations that will better align ORCA's operations with requirements as enumerated in its enabling legislation.

Background

The Council for Court Excellence estimates that approximately 8,000 people a year return to the District after serving a sentence in prison or jail.³ Upon their release, returning citizens often face discrimination because they have criminal records, which makes reentry exceedingly difficult.

D.C. Code § 24-1302 enumerates certain responsibilities to ORCA to coordinate and monitor service delivery to citizens returning to the District following incarceration. Specifically:

- “Serve as principal advisor to the Mayor....”
- “Respond to recommendations and policy statements from the Commission [on Re-Entry and Returning Citizen Affairs]....”
- “Identify areas for service improvement ... by funding research, hosting symposia....”
- “Coordinate efforts of District government agencies....”
- “Apply for, receive, and expend any gift or grant to further the purposes of the Office....”
- “Meet and coordinate with members of the Criminal Justice Coordinating Council....”

³ D.C. COUNCIL COMM. ON THE JUDICIARY AND PUBLIC SAFETY, REPORT AND RECOMMENDATIONS ON THE FISCAL YEAR 2015 BUDGET FOR AGENCIES UNDER ITS PURVIEW 47-8 (May 14, 2014).

BACKGROUND, OBJECTIVES, SCOPE AND METHODOLOGY

D.C. Code § 24-1302 also emphasizes ORCA’s role as an advocate and establishes how ORCA shall interact with four key entities to promote returning citizens’ concerns. As illustrated in Figure 1 below, ORCA is expected to: (1) advise the Mayor on policies and initiatives involving returning citizens; (2) coordinate services provided to returning citizens by District organizations; (3) collaborate with the Commission on Re-entry and Returning Citizen Affairs (Commission); and (4) collaborate with the Criminal Justice Coordinating Council (CJCC). ORCA coordinates with a variety of government and private agencies to provide on-site services or service referrals for direct, supportive, and transitional assistance in employment, education, housing, and health. The Commission is comprised of representatives from District government agencies and private organizations, and its purpose is similar to ORCA’s: “to advise the Mayor, the Council, and [ORCA] on the process, issues, and consequences of the reintegration of ex-offenders into the general population.”⁴ CJCC is an independent District government agency that focuses on developing targeted funding strategies and managing IT systems for criminal justice organizations.

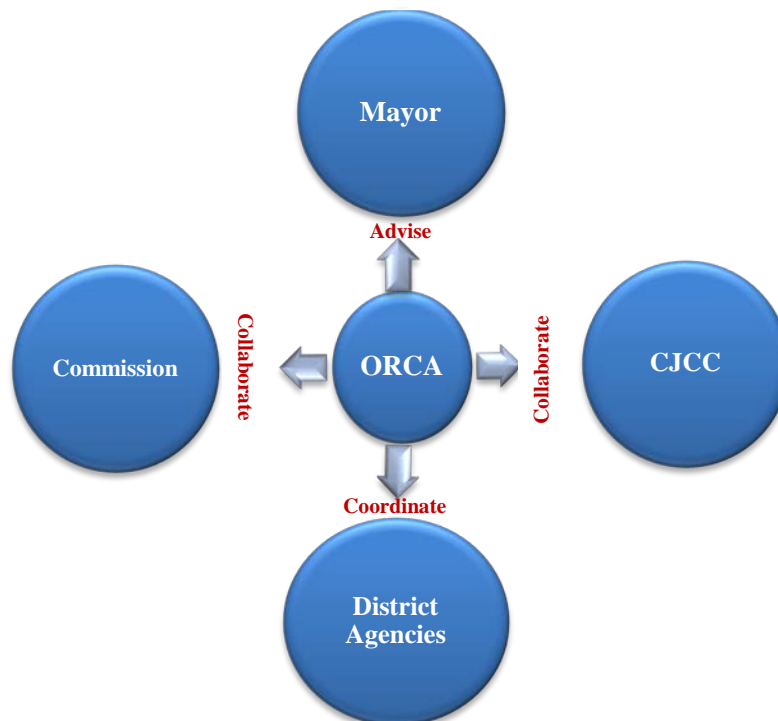


Figure 1: ORCA’s Mandated Partnerships

During ORCA’s FY 2014 performance and budget oversight hearings with the Council of the District of Columbia’s Committee on the Judiciary and Public Safety, Councilmembers expressed “serious concerns that ORCA is not meeting the needs of the District’s many returning

⁴ D.C. Code § 24-1303 (a).

BACKGROUND, OBJECTIVES, SCOPE AND METHODOLOGY

citizens.”⁵ Councilmembers questioned whether ORCA’s current staffing level and role as a referral agency was the most appropriate model for assisting returning citizens, and inquired about ORCA’s funding sources and capacity to provide more services if its budget increased. ORCA could not definitively answer many of these questions, and concerns regarding the quality and extent of ORCA’s services persisted.

ORCA’s FY 2015 budget was \$376,026; and its staff includes four, full-time employees (director, program analyst (functions as the agency Deputy Director), career development specialist, and administrative assistant); a full-time community service program specialist on detail from the Department of Corrections (DOC), and two interns.⁶ In FY 2014, 2,058 new clients registered with ORCA, and 3,739 returning clients received services. ORCA found employment for 152 clients in FY 2013 and 247 in FY 2014.

Objectives

This inspection included two objectives. The first objective was to assess ORCA’s organization, management, level of expertise, and the services delivered to its clients. The second inspection objective was to make recommendations for improving ORCA’s operations and communications with District stakeholders.

Scope and Methodology

The inspection’s scope was from FY 2013 through FY 2015. The inspection team conducted fieldwork from November 2014 through March 2015. Fieldwork included on-site observations; reviewing ORCA documents and legislative requirements; analyzing grant documentation; and interviewing ORCA staff, representatives of District agencies, federal government, and community-based organizations. The inspection team has maintained continued contact with ORCA and our factual and conditional statements still apply to ORCA’s current operations.

This inspection was conducted in accordance standards established by the Council of the Inspectors General on Integrity and Efficiency. As a matter of standard practice, OIG inspections pay particular attention to the quality of internal control.⁷

⁵ D.C. COUNCIL COMM. ON THE JUDICIARY AND PUBLIC SAFETY, REPORT AND RECOMMENDATIONS ON THE FISCAL YEAR 2015 BUDGET FOR AGENCIES UNDER ITS PURVIEW 48 (May 14, 2014).

⁶ See Appendix 3 for ORCA’s organization chart.

⁷ “Internal control” is synonymous with “management control” and is defined by the Government Accountability Office (GAO) as comprising “the plans, methods, and procedures used to meet missions, goals, and objectives and, in doing so, supports performance-based management. Internal control also serves as the first line of defense in safeguarding assets and preventing and detecting errors and fraud.” STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT, Introduction at 4 (Nov. 1999).

FINDINGS AND RECOMMENDATIONS

FINDINGS AND RECOMMENDATIONS

Discussion of Findings and Recommendations

The OIG inspection team concluded that ORCA lacked fundamental organizational mechanisms and resources necessary for: (1) ensuring that District residents incarcerated in local jails and federal prison facilities were knowledgeable of the District's re-entry resources, and (2) collaborating with District entities that offer post-release services that were critical to returning citizens' successful reintegration.

The inspection team found that while ORCA's staff worked diligently to provide direct services and client referrals, key organizational elements necessary to fulfill its overall mission, goals, and duties as established by D.C. Code § 24-1302(b) were not in place. Additionally, as a result of ORCA's failure to coordinate and monitor services provided by District agencies and community-based organizations, there were greater inefficiencies in advocacy and service delivery to returning citizens.

The principal conditions found were that ORCA:

- lacked a strategic plan;
- did not have staff with the skills needed to successfully write, submit, and obtain grants;
- did not use the full capabilities of its case management system;
- did not work with all local and federal partners to facilitate each agency's compliance with its May 2013 Memorandum of Understanding (MOU); and
- had not collaborated with the Commission (on Re-entry and Returning Citizen Affairs) to develop and execute policies, and provide recommendations to the Mayor.

As a result, ORCA did not fulfill several agency responsibilities as defined in D.C. Code § 24-1302. Additionally, ORCA was unable to coordinate and monitor services provided by District agencies and community-based organizations, which resulted in program inefficiencies.

The inspection team identified 12 recommendations to improve service delivery to returning citizens and to better align ORCA's operations with the requirements of its enabling legislation. ORCA agreed with seven of the 12 recommendations. A complete list of the report's findings and recommendations is included in Appendix 2.

Notable Accomplishments

During this inspection, the team identified several notable accomplishments. Specifically, ORCA:

- successfully advocated for replacing use of the term "ex-offender" with "returning citizen," which is a more positive depiction of those previously incarcerated;

FINDINGS AND RECOMMENDATIONS

- established a positive relationship with the Federal Bureau of Prisons to visit correctional facilities to share information on ORCA services and conduct family reunification visits in West Virginia and North Carolina;
- increased the number of ORCA clients who found employment, from 152 in 2013 to 247 in 2014; and
- began the Women Involved Reentry Efforts (WIRE) program in 2013 to address gaps in services for women in housing, employment, and family reunification. The Court Services and Offender Supervision Agency (CSOSA) recently honored ORCA's community service program specialist for her efforts to assist female returning citizens.

The report's findings address three major areas. The first area includes the status of key organizational elements, such as an agency strategic plan, grant writing expertise, and client data management and analysis. The second area discusses ORCA's need for better coordination with District agencies to provide more efficient service delivery to returning citizens. The final area discusses ORCA's need for regular communication and collaboration with community-based organizations and other government agencies that assist returning citizens.

1. ORCA lacks organizational elements essential for compliance with its responsibilities as defined by D.C Code § 24-1302.

a. ORCA lacks a strategic plan.

Condition: ORCA's strategic plan is outdated and poorly developed. The most recent strategic plan was effective only from 2011 to 2013, and lacked fundamental elements such as clear objectives, measurable goals, and performance benchmarks. The following excerpt illustrates this observation:

Strategic Objective 1: Strengthen [ORCA's]⁸ regional impact

Anticipated result by 2013

1 Effective and frequent communication throughout the network and about the network

⁸ Prior to the District Council's enactment of the Fiscal Year 2014 Budget Support Act of 2013 (D.C. Law 20-61, §§ 3061-62, effective Oct. 1, 2013), ORCA was named the Office on Ex-Offender Affairs (OEOA). OEOA is referenced throughout the agency's 2011 – 2013 strategic plan, and the OIG replaced references to OEOA with ORCA within this inspection report.

FINDINGS AND RECOMMENDATIONS

Actions

1 Identify and develop the tools required to communicate across [ORCA's] geographically and culturally diverse constituencies about the full range of work, services and issues being pursued

2 Wherever and whenever there are [ORCA]-sponsored meetings on re-entry, the content and format must reflect the full spectrum of [ORCA's] diversity

3 Expand on the use of electronic platforms, including WEB 2.0, bulletin boards and Web-based technologies, to facilitate interactive communication across and within the [ORCA] network

The strategic plan includes vague activities, like “expand,” “explore,” and “intensify,” which make evaluating successful completion of an action item difficult. ORCA's Director reported that, to remedy this issue, ORCA is developing an internship opportunity for Georgetown University Law School students to assist with writing a new strategic plan for FY 2015. When writing the new plan, ORCA said it plans to use input from the returning citizen community to help define its new objectives and vision.

Criteria: Strategic planning is an organization's process of defining its strategy, or direction, and making decisions on allocating its resources to pursue this strategy. It entails establishing agency-wide goals and aligning those with the agency's overall mission and vision. The U.S. Government Accountability Office (GAO) reported, “[a]n entity's mission may be defined in a strategic plan. Such plans set the goals and objectives for an entity along with the effective and efficient operations necessary to fulfill those objectives.”⁹ Strategic plans should support agency-wide goals, which include short-term objectives, indicators, and steps ultimately dictating the intended future direction of the agency. This plan should also include strategies and benchmarks for goal attainment as well as address resource allocation and performance indicators for each goal.

Cause: ORCA cited both staff turnover and the change in mayoral administrations as reasons for the delayed implementation of a new strategic plan. ORCA's Director postponed developing a new strategic plan until after the 2014 mayoral election so he could incorporate the new administration's mission and vision into ORCA's strategic plan. In addition, the employee responsible for creating ORCA's strategic plan resigned in FY 2015, further delaying development of the new plan.

Effect: The lack of a current and effective strategic plan impedes ORCA's ability to serve and advocate for returning citizens. Because the 2011-2013 strategic plan lacked major components (e.g., measurable objectives and timeframes), stakeholders were unable to thoroughly evaluate ORCA's performance and progress. Without a

⁹ STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT, Objective of an Entity at 13 (Sept. 2014).

FINDINGS AND RECOMMENDATIONS

comprehensive strategic plan, future funding and ORCA's ability to meet its legislative mandates may be adversely affected. If ORCA does not implement a strategic plan, returning citizens and District stakeholders will not clearly understand ORCA's short- and long-term goals for achieving its legislative mandate to provide advocacy, high-quality services, and useful information to returning citizens in the District.

The OIG recommends that the Director, ORCA:

- (1) Solicit, document, and incorporate input from District, federal, and private agencies and returning citizens regarding returning citizens' needs, and use this information to formulate new objectives for ORCA's next strategic plan.

Agree X Disagree

ORCA August 2015 Response, As Received: *We agree that the Mayor's Office on Returning Citizens Affairs (MORCA¹⁰) should solicit, document and incorporate input from District, federal and private agencies, and returning citizens themselves, regarding their needs, to formulate new objectives for the next strategic plan; indeed, assessing needs, making plans and implementing those plans to address returning citizens' needs has been ongoing and effective. We believe that the OIG laid undue emphasis on the presence or absence of a single document called a "strategic plan," when MORCA has and continues to engage in effective needs assessment, collaboration, planning and programming. As examples:*

In 2011, the current MORCA Director was appointed and began a strategic planning process with key goals including: (See attachment)

- *engaging the constituents and creating a mission/vision and value statements*
- *internal/external environmental landscape*
- *Strategic Objectives*
- *Vision for the Future*

MORCA developed several guides and brochures to promote its services and access to partnering agencies. These brochures were marketed to CSOSA, BOP and residential reentry centers (halfway houses). They were also included in packets that were shipped out to BOP reentry coordinators and Rivers Correctional Institution. MORCA's vision, mission and value statements were developed and included in the 2011 - 2014 Strategic Plan. (See attached)

To develop and strengthen relationships with key stakeholders (internal/external environmental landscape), the Director personally met with all the ex-officio non-voting members of the Commission on Reentry and Returning Citizen Affairs in order to share

¹⁰ Note: In its response, ORCA referred to itself as the Mayor's Office on Returning Citizen Affairs (MORCA). This name change has not been made official through legislative amendments. In this report, ORCA and MORCA are used interchangeably.

FINDINGS AND RECOMMENDATIONS

his vision and seek support for his efforts. The Director began an ongoing dialogue with CSOSA and U.S. Probation (USP) to ensure coordination of efforts and appropriate interactions between federal stakeholders. These actions led to MORCA participating in USP monthly orientation sessions for men and women returning to D.C., the CSOSA community justice sessions, videoconferencing, public safety meetings and call-ins throughout the city. ORCA developed a continuing monthly dialogue with the local advocacy community including, but not limited to; Council of Court Excellence (CCE), The Reentry Task Force and The Reentry Network for Returning Citizens. Additionally, the Director began to co-chair the Criminal Justice Coordinating Council's (CJCC) Reentry Steering Committee which consists of five reentry working groups; education, housing, employment, mental health and substance abuse.

The objectives of the strategic plan were to enable MORCA to meet its mandated mission as referenced in D.C. Code § 24-1302(b):

- *“Serve as principal advisor to the Mayor....”*
- *“Respond to recommendations and policy statements from the Commission [on Re-Entry and Returning Citizen Affairs]....”*
- *“Identify areas for service improvement ... by funding research, hosting symposia....”*
- *“Coordinate efforts of District government agencies....”*
- *“Apply for, receive, and expend any gift or grant to further the purposes of the Office....”*
- *“Meet and coordinate with members of the Criminal Justice Coordinating Council....”*

Noted below are examples of how MORCA has met these obligations:

Organizationally, MORCA advised the Mayor to appoint members to the Commission on Reentry and Returning Citizen Affairs, as well as the Corrections Information Council (CIC). Prior to 2012, the Commission on Reentry and Returning Citizens went without any appointments and was never a functioning body. The CIC was established in 2002, with a budget of \$600,000, which was zeroed out due to inactivity. In MORCA's advisory role to the Mayor, MORCA deemed these bodies critical to the success of the men and women returning from incarceration. With these recommendations the CIC board appointments were filled in 2012 as were the Commission on Reentry.

MORCA has supported the Commission on Reentry and Returning Citizen Affairs since its inception by participating in its initial rulemaking process, Commission retreats, providing space for its meetings including printing and ensuring a secured space for sensitive documents. MORCA participates as a non-voting member in the Commission's

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monthly meetings. Despite MORCA's ongoing support, the Commission has not recommended any policies or legislation for MORCA to respond to.

Substantively, within the first year of operation, and continuing today, MORCA staff reached out to a wide range of community based organizations serving the reentry population, to identify the most challenging needs of returning citizens, encourage the use of MORCA services and coordinate a referral process for providers. Several critical issues emerged:

1. *Need for sensitivity training on the part of providers and education for them on practices that generate recidivism or conduce to reintegration and success. MORCA began training providers on sensitivity and criminogenic methodologies pertaining to recently released and previously incarcerated individuals.*
2. *Need for digital skills. Through MORCA's intake process, MORCA found that most of the men and women returning from incarceration lacked digital skills. In partnership with OCTO, MORCA developed the first digital inclusion lab, specifically for returning citizens; where a "comprehensive training curriculum was established and participants received a refurbished computer and one year free broadband service after completion." This became a best practice and was included in the National League of Cities' white paper on broadband access. (See attachment). Even in the absence of a formal MOU, MORCA and OCTO continue to work productively together to ensure that returning citizens have the access to the latest software updates and digital skills.*
3. *Need for social inclusion. MORCA began social reintegration services for its clients, noting that anti-social behavior became apparent as a major barrier to successful reintegration. MORCA has hosted an annual conference on reintegration along with provider appreciation awards, and an annual female reintegration conference. MORCA recently leveraged resources through JGA sub-grantees to conduct workshops on parenting.*
4. *Need for a comprehensive understanding of all services available to returning citizens. MORCA Director met with critical municipal directors and developed a service-delivery plan specific for returning citizens. This plan was developed into an MOU with these partnering agencies, and was referred to as the D.C. Reentry Initiative. MORCA coordinated the service delivery from each partnering agency, including : Department of Employment Services (DOES), Department of Housing and Community Development (DHCD), Department of Human Services (DHS), Department of General Services (DGS), Department of Public Works (DPW), (Department of Consumer and Regulatory Affairs (DCRA), Department of Health (DOH), Department of Mental Health (DMH), Department of Motor Vehicles (DMV) and the District of Columbia Department of Human Resources (DCHR). The IG apparently believes that the expiration of the plan meant the expiration of all work in conjunction with various signatory agencies. This is*

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simply erroneous. Services are flowing unimpeded with all partnering agencies to returning citizens. Some examples:

- ✓ *MORCA refers clients to DHS for income assistance programs, child care, disability services and assistance for family reunification.*
 - ✓ *The FSET (food stamp employment and training) assistance program has allowed MORCA clients to receive additional services and benefits.*
 - ✓ *DOH provides urine analysis screening kits for MORCA to test clients.*
 - ✓ *DOH and MORCA also collaborated to provide Addiction Prevention and Recovery Administration (APRA) referrals when needed.*
 - ✓ *MORCA has established a referral process with DMH, which includes DMH holding weekly office hours within MORCA's resource center.*
 - ✓ *DMV and MORCA have created a partnership to provide non-drivers identification cards to clients. To date, over 700 vouchers have been distributed to MORCA clients.*
 - ✓ *MORCA coordinated with the Department of Disability Service (DDS) to establish a partnership to better meet the needs of clients with disabilities. Through this partnership DDS has weekly office hours at MORCA to provide services to clients as needed.*
5. *Need for jobs. Of course, key to reintegration is finding jobs for returning citizens. Here, MORCA's partnerships, advocacy and programs are robust and effective.*
- ✓ *DOES began accepting referrals to MORCA and accessing the needs of MORCA clients through the American Job Centers (AJC). A contact was established within the AJC who works directly with persons referred by MORCA, and confirms all necessary documentation prior to services being provided. In addition, thirty transitional employment slots were provided to MORCA annually so that MORCA might provide some of its clients with jobs.*
 - ✓ *Meanwhile, late in 2014, the District of Columbia passed some of the most progressive "ban the box" legislation in the country, seeking to erase improper discrimination against applicants who have had involvement in the criminal justice system. MORCA's Director played a critical role in the passage of this legislation and the ban the box legislation is also a critical success of the Criminal Justice Coordinating Council. MORCA is playing a vital role in making sure that returning citizens seeking jobs know their new rights.*
 - ✓ *MORCA and DGS have developed a collaborative partnership which includes a referral process for employment opportunities, on-the-job training and supplemental services (i.e. employment opportunities for emergency snow removal, etc.). DGS informs MORCA when employment announcements are posted and assist in the application process.*
 - ✓ *MORCA refers clients to DPW for Commercial Driver's License (CDL) training and DPW informs MORCA when employment announcements are posted. To date, 393 clients have gone through the CDL training as a*

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result of this program, and over 100 interested applicants await the opportunity to start the program.

- ✓ *MORCA coordinated with DCRA on the abandoned house abatement supplemental staffing program and referred qualified clients to DCRA contractors.*
- ✓ *MORCA coordinates with DCHR to provide technical assistance to MORCA's clients on the D.C. 2000 form, interviewing best practices, resume development and how to apply for jobs online through the DCHR website.*
- ✓ *MORCA and the District's Office on Aging (DCOA) established a referral partnership where MORCA refers all clients 65 and over to DCOA for senior services which includes job development and placements.*
- ✓ *MORCA in partnership with the District Department of Transportation (DDOT) provided on-the-job training for clients on street signage, line marking and flaggers.*

In sum, MORCA's relations with other District agencies are strong, and its programs are strategic and effective.

OIG Comment: Although ORCA stated the OIG "laid undue emphasis on the presence or absence of" a strategic plan, an up-to-date strategic plan would provide value to ORCA in documenting its goals, objectives, and initiatives. It would allow external stakeholders (e.g., District agencies and community-based organizations) to identify how they can align their resources and services with ORCA's. Additionally, an updated strategic plan would allow District stakeholders to measure ORCA's accomplishments and progress. The OIG encourages ORCA to solicit and incorporate feedback from returning citizens and partner agencies in order to update its current strategic plan, which was dated FY 2011-2013.

- (2) Ensure completion of a strategic plan that contains objectives and measurable goals focused on achieving ORCA's mission.

Agree **X** Disagree _____

- (3) Develop a mechanism to annually review ORCA's performance against its strategic plan and evaluate whether ORCA achieved the plan's goals at the end of the plan's term.

Agree **X** Disagree _____

ORCA August 2015 Response, As Received: *Performance goals and reviews are being done in conjunction with Greg Jackson, who directs the Mayor's Office of Community Relations and Services; Charon Hines, Mr. Jackson's supervisor and the Director of the Mayor's Office of Community Affairs, and her supervisor, the Chief of Staff, John Falcicchio; as well as with the Office of Performance Management run by Tony Saudek, who reports to the City Administrator.*

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b. ORCA staff does not have the skills needed to successfully write, submit, and obtain grants.

Condition: ORCA does not actively pursue grant opportunities to increase agency funding and programs. Since 2011, ORCA received one grant award from the District's Justice Grants Administration (JGA) totaling \$75,000 for job development services in FY 2012. The grant was ultimately extended through FY 2014. The JGA grant funded a Workforce Development Specialist position responsible for conducting post-release needs assessments for returning citizens, assessing returning citizens' employment needs, and finding employment for clients.¹¹ According to a senior ORCA official, ORCA submitted only one other grant proposal in FY 2012.

Criteria: There are two noted funding streams for ORCA's programs and services: grants and government appropriations. The Council annually approves funding for personnel and operating expenses. However, ORCA's Director is also required to apply for and obtain grants to fund additional programmatic needs for ORCA and its clients.¹² Agencies such as JGA and the Office on Partnerships and Grant Services (OPGS) offer District agencies technical assistance and training on grant writing. JGA also administers federal awards and other funding to nonprofit and government agencies to improve the programs, policies, and coordination of the District's juvenile and criminal justice systems.¹³

Cause: ORCA's staff does not have the skills needed to successfully write, submit, and obtain grants, and ORCA's Director has not sought assistance from external experts to address this weakness. ORCA's program analyst, who was responsible for generating grant proposals, resigned in January 2015; following the resignation, ORCA employees have not received technical assistance or training on writing and submitting grant proposals despite the resources available to them through OPGS and JGA. ORCA officials acknowledged that they lack the expertise to generate competitive proposals. ORCA officials stated that they have not explored alternative solutions, such as requesting funding for a full-time equivalent position (FTE) or contractor to provide grant-writing services.

Effect: ORCA's minimal success with securing grant funding and poor utilization of District grant-writing resources limit the extent of services it can offer returning citizens. To overcome this barrier and improve its chances of receiving a grant award, ORCA collaborated with several District agencies and, in FY 2015, applied for a "Second Chance Act Statewide Adult Recidivism Reduction Strategic Planning Program" (Second

¹¹ ORCA added this position to its FY 2015 FTEs, and the District Council approved the corresponding \$75,000 budget increase.

¹² D.C. Code § 24-1302(b)(2)(G) states that the ORCA Director shall "[a]pply for, receive, and expend any gift or grant to further the purposes of the Office"

¹³ [Http://jga.dc.gov/page/about-jga](http://jga.dc.gov/page/about-jga) (last visited Apr. 20, 2015).

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Chance) grant. In line with ORCA's statutory mission, the grant objectives are to:

- identify drivers of recidivism;
- identify a target population and recidivism reduction goals for the state;
- review the alignment of existing corrections programs and practices with evidence-based practices; and
- develop a strategic plan to meet statewide recidivism reduction goals using evidence-based practices.¹⁴

As of June 2015, ORCA had not received notification of whether the grant application was accepted.

The OIG recommends that the Director, ORCA:

- (4) Submit a budget enhancement request that includes funding for an FTE or contractor who will identify grant opportunities and work with ORCA senior officials to submit comprehensive grant applications.

Agree _____ Disagree X

ORCA August 2015 Response, As Received: MORCA respectfully suggests that the responsibility for allocating staff rests with the Mayor. That said, the Administration is devoted to ensuring the successful reintegration of returning citizens into the fabric of our community, and the prevention of recidivism, not only through MORCA, but through a number of agencies. The Administration is also keenly pursuing a number of grants and partnerships that will augment the District resources devoted to successful reintegration efforts. MORCA is a partner in these efforts, led by the Justice Grants Administration (JGA). In addition, the Bowser Administration's Office of Partnership and Grant Services (OPGS) publishes a weekly funding alert directed both at District agencies as well as the District's robust non-profit sector. OPGS hosts grant writing workshops, among other tasks. In addition, the newly-created Office of Federal and Regional Affairs works with the various federal executive branch agencies to identify potential funding opportunities from the federal government and to ensure that District agencies are participating when appropriate.

Against that backdrop, it is true that MORCA's budgets did not include money for grantwriting services, which spurred MORCA to partner with other municipal and community-based organizations. So while MORCA never took the lead on submissions, it was a participant in grant applications and was unsuccessful on all but one attempt to

¹⁴ SECOND CHANCE ACT STATEWIDE ADULT RECIDIVISM REDUCTION STRATEGIC PLANNING PROGRAM FY 2015 COMPETITIVE GRANT ANNOUNCEMENT, available at <https://www.bja.gov/Funding/15SCARecidivismReductionSol.pdf> (last visited May 15, 2015).

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secure Second Chance Act funding. In 2013, MORCA in partnership with Veterans on the Rise secured Second Chance Act funding for veterans who were involved in the criminal justice system. This funding allowed MORCA to refer fifty (50) veteran clients to Veterans on the Rise for services.

Again, the lack of a dedicated grantwriter did not stop MORCA from participating in grant applications since 2012, as the following chart demonstrates.

Federal/State Agency	Partner	Opportunity
U.S. Department of Justice	Justice Grants Administration	Planning Grant
U.S. Department of Justice	Department of Corrections	Planning Grant
U.S. Department of Justice	Veterans on the Rise	Mentoring (2)
U.S. Department of Education	OSSE	Educational Engagement in Corrections Facilities
U.S. Department of Justice	Hope House	Mentoring Children of Prisoners
D.C. Department of Employment Services	Nelson Welding	Apprenticeship Program
U.S. Department of Labor	ERCPCP	Adult Reintegration

OIG Comment: ORCA officials acknowledged that its staff does not have the training or expertise to generate competitive grant proposals and secure grant funding, and that, as an alternative, ORCA referred its clients to other agencies providing grant-funded services. This approach, however, does not meet the intent of D.C. Code § 24-1302(b)(2)(G), which requires that ORCA “[a]pply for, receive, and expend any gift or grant to further the purposes of the Office....” Submitting a budget enhancement request to the District Council via the Executive Office of the Mayor informs all involved parties of this staffing need, the estimated cost, and the anticipated benefits to ORCA’s operations. The OIG stands by its recommendation as written so that ORCA’s capability to pursue grant opportunities is enhanced.

- (5) Consult with other District agencies and organizations, including the JGA and OPGS, for technical assistance and training on grant writing and submission.

Agree X Disagree

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ORCA August 2015 Response, As Received: MORCA received a Workforce Development grant from JGA, with federal Byrne grant funds, which funded a Job Developer position within the office from FY12-FY 2014, and in the current fiscal year, ORCA successfully transitioned this position to the Department of Corrections. In addition, upon completion of the grant MORCA was able to get a budget enhancement to fund a FTE for Job Development. MORCA continues to look for opportunities to partner with both JGA and OPGS as opportunities become available.

c. ORCA does not use its case management system's full capabilities.

Condition: ORCA does not use the full capacity of its electronic case management system, and still relies on a paper-based system when compiling information. Graduate-level interns from Howard University's School of Social Work complete intake and assessment forms with clients to document strengths, weaknesses, and appropriate service referrals.¹⁵ The interns start a manual (paper) case file containing these forms and enter intake and assessment data into the electronic case management system. However, that client data is not consistently entered into the system as required. Additionally, ORCA does not use the case management system to track fundamental service delivery metrics, such as how many times a client visited ORCA and the services requested or received during each visit. Therefore, when ORCA receives a request for detailed information (e.g., the number of client referrals to or from an organization, the outcome of referrals, or the number of individuals who completed training or certificate programs), interns contact the referral agency or manually review client sign-in sheets and paper-based client files prior to responding to the request.

Criteria: In FY 2013, the CJCC partnered with ORCA to implement an electronic case management system that would improve ORCA's capacity to collect and report information on the population of returning citizens it serves.¹⁶ The system was designed to increase ORCA's capacity for:

- developing performance measures;
- responding to requests for information from external stakeholders; and
- producing reports that respond to pressing programmatic and policy questions centered on returning citizens.¹⁷

¹⁵ New clients complete intake forms that collect demographic and other information, such as a client's telephone number, address, education level, as well as housing and employment needs.

¹⁶ D.C. Code § 24-1302(b)(2)(I) mandates that ORCA's Director "[m]eet and coordinate with members of the Criminal Justice Coordinating Council . . . and their designates, to disseminate information and recommendations to and from the voting members of the Commission."

¹⁷ DISTRICT OF COLUMBIA CRIMINAL JUSTICE COORDINATING COUNCIL'S STATISTICAL ANALYSIS CENTER, REENTRY IN THE DISTRICT OF COLUMBIA: SUPPORTING RETURNING CITIZEN'S TRANSITIONS INTO THE COMMUNITY 4-5 (Dec. 2013).

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CJCC created and launched the system for ORCA in September 2013 and trained ORCA staff on how to use it.

Cause: ORCA relies on interns with irregular work schedules for client data entry. Although two interns assist with this task, there are extended periods when ORCA does not have interns (e.g., summer, winter, and spring breaks). Further, ORCA has not tasked a full-time employee with data entry responsibilities during the interns' absences. ORCA reported that employees' other job duties limited the time available to complete this administrative task. ORCA also said that the agency needs additional FTEs to update data in the system after initial client information is entered, to reflect modified or additional services, progress, and outcomes.

ORCA submitted a budget enhancement request to the Executive Office of the Mayor (EOM) in FY 2014 to address its need for additional personnel who could manage data entry tasks. ORCA requested funding for a case manager and operations manager whose responsibilities would include:

- assessing, tracking, and following-up on client service delivery;
- overseeing student interns; and
- serving as points-of-contact for individuals transitioning from incarceration back into the District.

ORCA reported that the EOM did not incorporate its enhancement request into the FY 2015 budget or provide an explanation for rejecting the request.

Effect: Limited staffing and continued reliance on a paper-based case management system presents several challenges to ORCA's operations, including satisfying reporting requirements and providing quality and timely services. Conducting manual file reviews to generate or verify client information is time consuming, and the accuracy and thoroughness of such reports are questionable. Relying on a paper-based system means that ORCA cannot respond in a timely manner to data requests from the Commission. Additionally, ORCA cannot generate recommendations and policy statements, produce reports, conduct data analysis on clients and services, or anticipate emerging trends in client services.

The OIG recommends that the Director, ORCA:

- (6) Ensure that the electronic case management system contains accurate and up-to-date client intake, assessment, service delivery, referral, and outcome data.

Agree _____ Disagree **X**

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ORCA August 2015 Response, As Received: MORCA and the CJCC began collaborating in 2012 on the need to replace the antiquated paper data collection system and replace it with a digital data collection system. The CJCC received funding to build an Access data collection system, to be used and housed at MORCA for the purpose of collecting data. This system by no means is a Case Management System, nor was its intended purpose case management. The Access data collection system has been used to its full capacity, allowing MORCA to readily share data with our partners, identify resources to cater to the needs of returning citizens, produce timely annual reports and keep accurate placement data for MORCA's clients. Furthermore, MORCA is proud that it has leveraged the skills of graduate school interns to help use the access data collection system.

That said, MORCA agrees that a case management system that would help document metrics, i.e. Efforts to Outcomes (ETO), would ideally be put into place to better allow MORCA to manage its clients' successes and failures and communicate with partner referrals. With such a system, support staff to monitor and oversee the system would be needed, which, again, is an executive and budget determination that must be made in the full context of the District's finances, budget, Council-approved appropriations, organizational structure and priorities.

OIG Comment: Regardless of which term is more accurate, "case management" (a term used in CJCC's December 2013 publication "Reentry in the District of Columbia: Supporting Returning Citizens' Transitions into the Community") or "data collection," the OIG stands by its recommendation that ORCA take appropriate action to ensure that the system contains accurate and up-to-date data that allow ORCA to efficiently meet its statutory responsibilities.

2. ORCA's relationships with District agencies and other service providers need improvement in order to meet client needs.

Condition: ORCA neither worked with all local and federal partners to facilitate each agency's compliance with the "Memorandum of Understanding for the Implementation of the District of Columbia Reentry Initiative and the Reentry Resource Center" (MOU)¹⁸ nor assumed the lead to facilitate implementation of a new MOU.¹⁹ Additionally, ORCA did not evaluate and monitor partner services for returning citizens.

While ORCA has partnerships with numerous community-based organizations to facilitate service delivery to returning citizens, it has not formalized partnerships with several MOU parties that agreed to provide reentry services through ORCA's Reentry Resource Center. As an example, ORCA and DOC did not coordinate how the following MOU requirements, for which DOC had primary responsibility, would be implemented:

¹⁸ See Appendix 4 for a copy of the MOU.

¹⁹ The MOU expired on September 30, 2013.

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- Undertake a cooperative effort with ORCA to refer inmates who will be released from the DOC Reentry Unit and inmates who upon release from DOC Residential Substance Abuse Treatment (RSAT) are appropriate for outpatient services.
- Upon receipt of the inmate's signed consent to release information, coordinate pre-release/discharge planning with ORCA and work with ORCA case managers to ensure release plans are completed before the returning citizen's release date.
- During the pre-release/discharge planning process, inform the ORCA case manager when an eligible inmate fails or is unable to complete a core course(s) that the inmate has the potential to participate in through the D.C. Reentry Program.
- Inform ORCA when an inmate is scheduled for release from the institution.²⁰

In addition, ORCA provides several on-site services that other agencies and organizations provide, which contradicts one of the MOU's primary aims to eliminate duplicative services.

For example, ORCA provides on-site workforce development training on topics including workforce behaviors and interviewing skills; yet, the Department of Employment Services (DOES) also offers these services. ORCA also performs on-site urinalysis for drug usage on some clients prior to referring them to in-house training and DOES' Project Empowerment Program; but the District's Addiction Prevention and Recovery Administration (APRA) additionally offers urinalysis screening for drug use.²¹ A DOES official reported that ORCA's screening process might have weaknesses that make it easy for clients to obtain "negative" test results and that DOES uses a certified contractor to screen ORCA referrals prior to acceptance in the program. Therefore, it may be more appropriate for APRA or DOES to provide this service because it does so routinely and without apparent weaknesses. These examples illustrate an inefficient use of ORCA's limited staffing and funding resources by providing duplicative services.

Criteria: ORCA is mandated to coordinate services among District government agencies for returning citizens.²² To facilitate this effort, ORCA executed the MOU in May 2013. The MOU established a "cooperative and mutually beneficial relationship among the parties and federal partners and [] set forth the relative responsibilities of the parties insofar as they relate to the provision of reentry services²³ provided to adults in the

²⁰ *Id.* at 4-5.

²¹ The Department of Health provides urinalysis kits for ORCA to administer the tests, which screen for alcohol and illegal drugs.

²² D.C. Code § 24-1302(b)(2)(E).

²³ According to the MOU, "Reentry services include workforce development, education, housing assistance, life skills training, substance abuse rehabilitation, mental and physical health care, family/community support services, and community education" *Id.* at 1.

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District of Columbia”²⁴ Twenty-three agencies/entities, including ORCA, signed the MOU. ORCA was responsible for coordinating all post-delivery services through its Reentry Resource Center, including:

- referrals to agencies for services;
- collection and storage of data;
- sharing information to prevent duplication of services;
- annual reporting; and,
- evaluation of services.²⁵

Cause: ORCA does not have dedicated FTE to perform in a service coordinator role. These responsibilities include:

- engaging the respective MOU agencies, establishing protocols for collaboration;
- tracking incoming and outgoing referrals;
- ensuring that agencies maintain records of the services they provided referred clients; and
- evaluating service delivery reports.

Similarly, ORCA provided some on-site services available at partner agencies because it wanted to centralize in-demand services within the Reentry Resource Center despite its low staffing levels. ORCA’s requests for an operations manager and/or case manager who could handle these responsibilities were not approved.

This MOU expired on September 30, 2013, just 4 months after being finalized. Although the MOU could have been extended for any succeeding fiscal year by having all parties sign an addendum, ORCA has not tried to renew the MOU or execute a new one.

Effect: ORCA, in partnership with other District agencies, did not execute key provisions of the MOU. As a result, ORCA is expending resources by delivering services that other District agencies can (and are better equipped to) provide. In addition, ORCA does not engage with MOU partners and, thus, does not have accurate data on the extent of services available and provided to the District’s returning citizens.

²⁴ *Id.*

²⁵ *Id.* at 2.

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Overall, ORCA missed opportunities to potentially eliminate duplicate service delivery, establish services for unmet needs, and remove impediments to seamless reintegration into the District for returning citizens. In addition, because ORCA does not collect pre-release inmate data from correctional facilities such as DOC and BOP, it cannot help ensure that returning citizens are linked to appropriate programs or services (e.g., substance abuse treatment) prior to their release.

The OIG recommends that the Director, ORCA:

- (7) Review, assess, and analyze services of District and federal agencies and community service organizations to determine all of the services designated for or available to returning citizens in the District.

Agree _____ **X** _____ Disagree _____

- (8) Assess whether sufficient services are available to meet returning citizens' essential needs and evaluate how ORCA or other District organizations can fill identified service delivery gaps.

Agree _____ **X** _____ Disagree _____

ORCA August 2015 Response, As Received: *As demonstrated above, MORCA is continuously reviewing the services of District and federal agencies and non-profit organizations. With these groups, and through coalitions and umbrella organizations like the Criminal Justice Coordination Council, MORCA is forging partnerships to ensure that returning citizens are reintegrated into society, land jobs, have housing, stay healthy and build skills and positive relationships. MORCA agrees that continued review and analysis of services is a required function for the successful reintegration of its clients. MORCA would also like to point out that data sharing is key in the process of communicating and analyzing services among agencies, consistent with privacy protections required by law. We agree that a critical need among the many agencies serving returning citizens is a technological system for sharing data more effectively.*

- (9) Execute a new MOU with new and former partner agencies that establishes how each entity will collaborate with ORCA to provide re-entry services to the District's returning citizens.

Agree _____ Disagree _____ **X** _____

ORCA August 2015 Response, As Received: *A new MOU is not necessary, for at least two reasons. First, the MOU referenced actually became a Mayoral Order (2013-029) on January 30, 2013. (See attached). Thus, a coordinated approach among agencies that are dedicated in whole or in part to the needs of returning citizens, and public safety is ensconced permanently into law. Since publication of the Mayor's Order MORCA has*

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continued communicating, sharing best practices and information with its partnering agencies.

Second, simply renewing the old MOU would inadequately reflect the current and far more expansive network of relationships and partnerships MORCA has formed. That is, MORCA is successfully partnering with other agencies that were not signatories to the old MOU, without spending all the time necessary to secure approvals for a formal MOU. Partnerships with additional non-MOU partners include; Department of Parks and Recreation (DPR), which has provided transportation to various institutions housing District residents and the U.S. Attorney's Office, which collaborated with MORCA on a hiring fair at MORCA's office that included private sector companies and on-the-spot opportunities for MORCA clients.

In another example of how MORCA's partnerships far exceed the agreements worked out in the expired MOU, MORCA has partnered with the D.C. Board of Elections and Ethics (BOEE) to craft an exciting and exemplary civic reintegration program to promote voting. MORCA has provided voting education and registration services for 2,251 clients since its inception in 2012. MORCA, in partnership with the DOC and the BOEE, has facilitated the election process at the D.C. Jail and ensured that every eligible D.C. resident in the DOC who wanted to vote had an opportunity to do so.

In sum, criticizing the MORCA for allowing the MOU to expire is simply misplaced. ORCA continuously meets to discuss opportunities for collaboration with faith, nonprofit and community-based organizations. MORCA also meets with private sector businesses to promote hiring of returning citizens and to educate companies on EEOC guidelines, criminal background screenings and the new Ban the Box legislation – all activities that were not encompassed by the MOU but that are important strategic priorities.

OIG Comment: The OIG disagrees with ORCA's assertions that the MOU "became a Mayoral Order" and that "a coordinated approach among agencies ... is ensconced permanently into law." The Mayor's Order, which went into effect before any parties had signed the MOU, delegated authority to specific D.C. government agencies "to execute and implement the MOU" and instructed the agencies subject to the Order to cooperate with ORCA in implementing the MOU. When the MOU expired, the partner agencies were no longer obligated to fulfill responsibilities cited in the MOU.

Furthermore, the OIG believes that the following language from the Mayor's Order reinforces the efficacy of an MOU to coordinate and administer the work of multiple agencies that serve returning citizens:

While it is believed that agency directors have the requisite delegation of Mayoral authority to execute and implement the MOU, the importance of the initiative supported by the MOU warrants that the delegation of

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authority be confirmed to remove the possibility of an impediment to the achievement of its objective.

The OIG stands by its recommendation that ORCA enter into a new MOU that reflects all of ORCA's current strategic priorities and partnerships. An MOU is an effective mechanism for documenting partnership and performance expectations among multiple entities; holding all parties accountable; and maintaining continuity of services to returning citizens year after year.

(10) Designate an employee who will be responsible for coordinating with each partner agency to ensure effective and efficient service delivery to returning citizens in accordance with the new MOU's requirements.

Agree _____ Disagree X

ORCA August 2015 Response, As Received: *It follows that if MORCA has no new MOU, it won't have designated liaisons pursuant to the MOU.*

3. Ineffective collaboration with the Commission hinders implementation of new policies and initiatives.

Condition: ORCA's relationship with the Commission does not function as intended. ORCA has not collaborated with the Commission to develop, assess, or submit policy recommendations to the Mayor, and the Commission's 13 non-voting members have not held quarterly meetings with ORCA's Director. The Director attends monthly Commission meetings with the Commission's voting members, but a quorum of voting members is usually not present to vote on how the Commission will proceed with a policy, recommendation, or initiative. The OIG team reviewed monthly meeting minutes and noted this forum was used to discuss items of concern or areas for collaboration rather than finalize recommendations for submission to the Mayor.

In addition, although the Commission's enabling legislation states that non-voting Commission members must meet quarterly with the Director, this does not occur. ORCA's Director noted he engaged some non-voting members to discuss implementing policies and programming within the member's respective agency, but other members have not established quarterly meetings with him as required.

Criteria: ORCA's Director must respond to recommendations and policy statements from the Commission,²⁶ and must meet with non-voting Commission members at least once per quarter to plan and coordinate policies and programs that assist in the successful reintegration of returning citizens into the general population.²⁷ The Commission must

²⁶ D.C. Code § 24-1302(b)(2)(C).

²⁷ D.C. Code § 24-1303(b)(2).

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advise ORCA by “provid[ing] continuing review of the planning undertaken by [ORCA].”²⁸

Cause: Guidelines for how ORCA and the Commission should collaborate do not exist and interviewees’ opinions about how they should collaborate varied. The team reviewed the Commission’s procedures and found they do not define how it should advise ORCA’s Director or collaborate to promote policy statements and recommendations to the Mayor. ORCA also lacks protocols for exchanging information with the Commission for feedback. The lack of protocol contributes to uncertainty between both parties on how they could and should interact.

Effect: The Commission is comprised of public and private sector leaders who are knowledgeable and resourced to affect change for returning citizens. However, ORCA does not effectively engage the Commission to build consensus on how District agencies can serve the needs of the returning citizen population. When the panel of non-voting members and ORCA fail to meet, it minimizes ORCA’s opportunities for developing strategies at a “state-level” to improve the quality of life for the District’s returning citizens.

The OIG recommends that the Director, ORCA:

- (11) Work with non-voting Commission members to establish dates and times each fiscal year for required quarterly meetings with all non-voting Commission members and propose discussion items for each meeting that address how the Commission, in collaboration with ORCA, can achieve agreed upon goals.

Agree _____ Disagree X

ORCA August 2015 Response, As Received: *MORCA believes that the Commission should spearhead efforts to bring non-voting Commissioners to quarterly meetings. As stated previously, MORCA has and continues to support the Commission on Reentry and Returning Citizen Affairs, but the Commission needs to take the lead on collaborating with the seventeen various agencies and allow MORCA to support their efforts.*

OIG Comment: **The Commission’s establishing legislation states that the 13 ex-officio non-voting members, i.e., specific officials or their designees from 13 District government entities, “shall meet with the Director[, ORCA], at a minimum, once per quarter” D.C. Code § 24-1303(b)(2). Similarly, D.C. Code § 24-1302(b)(2)(E) states that the Director, ORCA shall “[c]oordinate efforts of District government agencies targeted toward returning citizens” The OIG believes the Director, ORCA is best positioned to lead collaboration and schedule meetings among the non-voting Commission members and encourages him to do so.**

²⁸ D.C. Code § 24-1303(c)(6).

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- (12) Collaborate with the Commission chairman to establish procedures for how the Commission will review ORCA's planning and how they will communicate, consider, and respond to each other's recommendations and policy statements.

Agree _____ **X** _____ Disagree _____

ORCA August 2015 Response, As Received: *Concluding Response*
MORCA appreciates the insights of the OIG and appreciates its emphasis on planning, partnerships, coordination, and case management. MORCA will continue to search for more resources to better serve as the Mayor's liaison to returning citizens in the District of Columbia. That said, MORCA believes that the OIG's findings overlook critical accomplishments it has achieved and under-appreciate MORCA's distinctive role in the larger strategy of reintegrating returning citizens to D.C.

APPENDICES

APPENDICES

- Appendix 1:** Acronyms and Abbreviations
- Appendix 2:** Findings and Recommendations
- Appendix 3:** Organization Chart
- Appendix 4:** District of Columbia Reentry Initiative and Reentry Resource Center
MOU

APPENDIX 1

APPENDICES

Appendix 1 – Acronyms and Abbreviations

APRA	Addiction Prevention and Recovery Administration
BOP	Federal Bureau of Prisons
CJCC	Criminal Justice Coordinating Council
CSOSA	Court Services and Offender Supervision Agency
DOC	Department of Corrections
DOES	Department of Employment Services
EOM	Executive Office of the Mayor
FTE	Full-time Equivalent
FY	Fiscal Year
GAO	United States Government Accountability Office
I&E	Inspections and Evaluations
JGA	Justice Grants Administration
OIG	Office of the Inspector General
OPGS	Office on Partnerships and Grant Services
MOU	Memorandum of Understanding
ORCA	Office on Returning Citizen Affairs ²⁹

²⁹ Note: In its response to the Draft Report, ORCA referred to itself as the Mayor’s Office on Returning Citizen Affairs or MORCA.

APPENDIX 2

Appendix 2 – List of Findings and Recommendations

1. ORCA lacks organizational elements essential for compliance with its responsibilities as defined by D.C Code § 24-1302.

The OIG recommends that the Director, ORCA:

- (1) Solicit, document, and incorporate input from District, federal, and private agencies and returning citizens regarding returning citizens' needs, and use this information to formulate new objectives for ORCA's next strategic plan.
- (2) Ensure completion of a strategic plan that contains objectives and measurable goals focused on achieving ORCA's mission.
- (3) Develop a mechanism to annually review ORCA's performance against its strategic plan and evaluate whether ORCA achieved the plan's goals at the end of the plan's term.
- (4) Submit a budget enhancement request that includes funding for an FTE or contractor who will identify grant opportunities and work with ORCA senior officials to submit comprehensive grant applications.
- (5) Consult with other District agencies and organizations, including the JGA and OPGS, for technical assistance and training on grant writing and submission.
- (6) Ensure that the electronic case management system contains accurate and up-to-date client intake, assessment, service delivery, referral, and outcome data.

2. ORCA's relationships with District agencies and other service providers need improvement in order to meet client needs.

The OIG recommends that the Director, ORCA:

- (7) Review, assess, and analyze services of District and federal agencies and community service organizations to determine all of the services designated for or available to returning citizens in the District.
- (8) Assess whether sufficient services are available to meet returning citizens' essential needs and evaluate how ORCA or other District organizations can fill identified service delivery gaps.
- (9) Execute a new MOU with new and former partner agencies that establishes how each entity will collaborate with ORCA to provide re-entry services to the District's returning citizens.

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(10) Designate an employee who will be responsible for coordinating with each partner agency to ensure effective and efficient service delivery to returning citizens in accordance with the new MOU's requirements.

3. **Ineffective collaboration with the Commission hinders implementation of new policies and initiatives.**

The OIG recommends that the Director, ORCA:

(11) Work with non-voting Commission members to establish dates and times each fiscal year for required quarterly meetings with all non-voting Commission members and propose discussion items for each meeting that address how the Commission, in collaboration with ORCA, can achieve agreed upon goals.

(12) Collaborate with the Commission chairman to establish procedures for how the Commission will review ORCA's planning and how they will communicate, consider, and respond to each other's recommendations and policy statements.

APPENDIX 3

Appendix 3 – Organization Chart

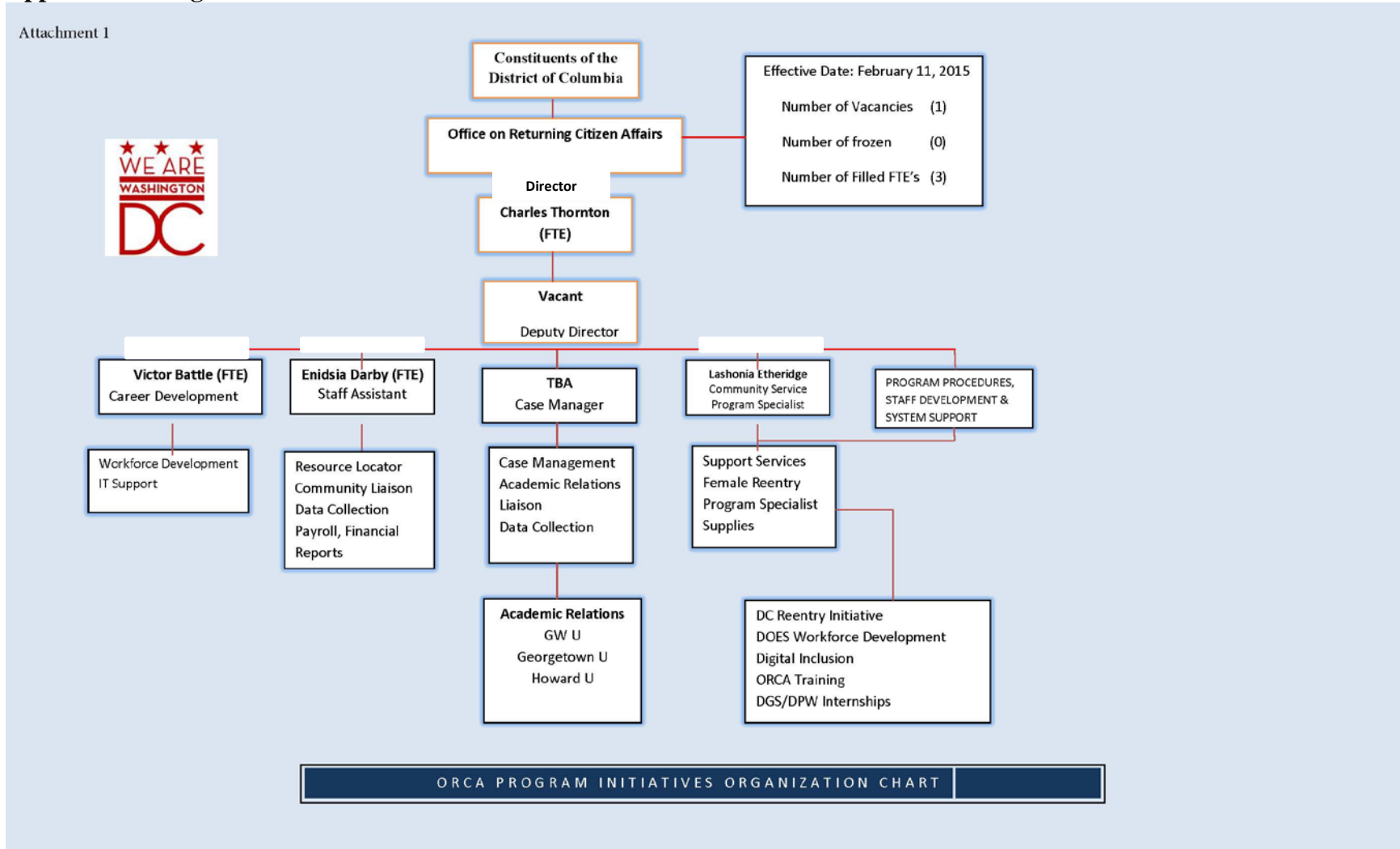
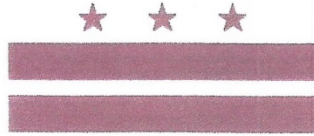


Figure 2: This organization chart was included in ORCA’s February 2015 performance oversight hearing responses to the District Council.

APPENDIX 4

Appendix 4 - District of Columbia Reentry Initiative and Reentry Resource Center MOU



The District of Columbia

**MEMORANDUM OF UNDERSTANDING
FOR THE IMPLEMENTATION OF THE
DISTRICT OF COLUMBIA
REENTRY INITIATIVE
And
THE REENTRY RESOURCE CENTER**

APPENDICES

I. INTRODUCTION

This Memorandum of Understanding (MOU) is entered into between the Office of Returning Citizen Affairs (ORCA), the City Administrator, the Office of the Deputy Mayor for Public Safety and Justice, the Office of the Deputy Mayor Education, the Office Of the Deputy Mayor for Planning and Economic Development, the District of Columbia Criminal Justice Coordinating Council (CJCC), the Department of Employment Services, the D.C. Department of Corrections, the Department of Human Services, the Department of General Services, the Department of Public Works, the Department of Consumer and Regulatory Affairs, the Department of Health, the Department of Mental Health, the Department of Motor Vehicles, and the Community College of the District of Columbia, collectively referred to as the "Parties". Additionally, the Court Services and Supervision Agency, United States Parole Commission, United States District Court for the District Of Columbia, and the Federal Bureau of Prisons are joining the MOU as participating federal partners. This MOU is intended to be non-financial in nature. The commitments referenced in this MOU are intended to be performed by the parties or federal partners pursuant to their existing authority and budget.

II. LEGAL AUTHORITY FOR MOU

This MOU is authorized pursuant to section 3 of the Office of Ex-Offender Affairs and Commission on Re-Entry and Ex-Offenders Affairs Establishment Act of 2006, effective March 8, 2007 (D.C. Law 16-243; D.C. Official Code § 24-1302)(2012 Supp.) (Act) and Mayor's Order 2012-31, February 28, 2012. Section 3(b)(2)(E) of the Act assigns ORCA the statutory duty to coordinate the efforts of the District agencies targeted toward ex-offenders.

III. OVERVIEW OF PURPOSE AND GOALS

WHEREAS, the purpose of this MOU is to establish a cooperative and mutually beneficial relationship among the parties and federal partners and to set forth the relative responsibilities of the parties insofar as they relate to the provision of reentry services provided to adults in the District of Columbia; and

WHEREAS, the District inmate population served by the District of Columbia Department of Corrections, and the Federal Bureau of Prison, is comprised of adult misdemeanants and felons who may have substance abuse problems, mental and physical health challenges, limited skills and employment histories, limited education, separation from family, and unstable living conditions, to wit: a need for the development of skills through education and training to assist in successful completion of sentence and to be more a productive citizen; and

WHEREAS, reentry services include workforce development, education, housing assistance, life skills training, substance abuse rehabilitation, mental and physical health care, family/community support services, and community education ; and

WHEREAS, approximately 3,000 misdemeanants released each year by the District of Columbia Department of Corrections, and approximately 2,500 District felons released by the

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Federal Bureau of Prisons are in need of linkages with municipal and community-based services at all phases of adult reentry systems including sufficient housing assistance, job training, education, life skills, and family/community support services, and

WHEREAS, a collaboration of local and federal agencies will participate in the process of addressing offender reentry for adults and in that the parties and its members to this MOU shall,

- A. Participate in the District's Reentry Initiative
- B. Implement the Reentry Strategy for Adult offenders
- C. Take additional action as deemed necessary

NOW, THEREFORE, in consideration of the mutual aims and desires of the parties and federal partners to this MOU and in recognition of the public benefit to be derived from an effective alignment of reentry services, the parties agree to the following:

III. TERM

The period of this MOU shall be from the date of the last party signing this MOU through September 30, 2013, unless terminated earlier in writing by the Parties. This MOU may be extended for any succeeding fiscal year by the signing of an addendum by all the parties for that succeeding fiscal year, subject to availability of funds at the time of the signing of the addendum.

IV. SCOPE OF SERVICES

A. THE OFFICE OF RETURNING CITIZENS AFFAIRS (ORCA)

ORCA will coordinate all post delivery services thru the Reentry Resource Center to include referrals to agencies for services, collection of data, storing of data, sharing of information to prevent duplication, annual report, and evaluation of services.

B. THE OFFICE OF THE CITY ADMINISTRATOR will:

Direct the necessary agencies within its cluster to comply with requirements of the DC Reentry Initiative.

C. THE OFFICE OF THE DEPUTY MAYOR FOR PUBLIC SAFETY AND JUSTICE will:

Direct the necessary agencies with-in its cluster to comply with requirements of the DC Reentry Initiative.

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D. THE OFFICE OF THE DEPUTY MAYOR EDUCATION will:

Direct the necessary agencies with-in its cluster to comply with requirements of the DC Reentry Initiative.

E. THE OFFICE OF THE DEPUTY MAYOR FOR PLANNING AND ECONOMIC DEVELOPMENT will:

1. Direct the necessary agencies within its cluster to comply with requirements of the DC Reentry Initiative.
2. Facilitate the collaboration among ORCA/DOES.

F. THE OFFICE OF THE DEPUTY MAYOR FOR HEALTH AND HUMAN SERVICES will:

1. Direct the necessary agencies within its cluster to comply with requirements of the DC Reentry Initiative.
2. Facilitate the collaboration among ORCA/DHS

G. THE DISTRICT OF COLUMBIA CRIMINAL JUSTICE COORDINATING COUNCIL (CJCC) will:

1. Support, through the Reentry Steering Committee, the identification of legislative and policy initiatives that promote constructive reintegration of returning citizens.
2. Provide technical assistance and other resources as needed and available.
3. Assign its Director or designee to participate as a member of the Commission on Reentry.

H. THE DEPARTMENT OF EMPLOYMENT SERVICES (DOES) will:

1. Conduct a comprehensive needs assessment for participants referred to DOES. The assessment will be conducted through the American Jobs Centers to determine participant employment needs and should include job development and job placement services for job ready participants.
2. Establish a contact from each American Job Center to assist with referrals to other partner organizations to provide participants a menu of comprehensive services.
3. Ensure that enrolling participants possess the necessary documentation such as proper identification, Social Security card, proof of high school diploma or GED, and police clearances for program eligibility

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- determination. Assist in the coordination of activities and additional services through existing partners and other stakeholders.
4. Supply supportive services and resources to participants that may include Metro bus tokens and/or uniforms, as appropriate.
 5. Secure federal bonds for participants referred for employment, when required.
 6. Enter into the Virtual One Stop (VOS) System, the following information: participant referral, enrollment, and completion data. Maintain status and progress reports for each participant electronically and provide reports of current employment and placement information for participants monthly.
 7. Provide technical assistance and success to updated listings of DOES Eligible Training Providers and labor market information.
 8. Partner with the Office on Returning Citizen Affairs (ORCA) on Federal and Local Grant opportunities, where feasible.
 9. Commit 30 Transitional Employment slots for ORCA participants.
 10. Assign the DOES Director or designee to participate as a member of the Commission on Reentry.

I. THE DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT (DHCD) will:

1. Assign a representative of DHCD who is fully knowledgeable in all DHCD protocols to coordinate efforts to address reentry housing opportunities thru public property disposal and tax credits.
2. Facilitate the collaboration among local and federal development partners to address reentry housing opportunities for Returning Citizens.
3. Create or leverage additional housing opportunities for Returning Citizens.
4. Assign its director or designee to participate as a member of the DC Reentry Commission.

J. THE D.C. DEPARTMENT OF CORRECTIONS (DOC) will:

1. Undertake a cooperative effort with ORCA to refer inmates who will be released from the DOC Reentry Unit and inmates who upon release from DOC Residential Substance Abuse Treatment (RSAT) are appropriate for outpatient services.
2. Upon receipt of the inmate's signed consent to release information, coordinate pre-release/discharge planning with ORCA and work with ORCA case managers to ensure release plans are completed in advance of the returning citizen's release date.

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3. During the pre-release/discharge planning process, inform the ORCA case manager when an eligible inmate fails or is unable to complete a core course(s) that the inmate has the potential to participate in through the DC Reentry Program.
4. Inform ORCA when an inmate is scheduled for release from the institution.

K. THE DEPARTMENT OF HUMAN SERVICES (DHS) will:

1. Assign a representative of DHS who is fully knowledgeable in all DHS protocols to coordinate DHS pre-release activities in conjunction with other organizations participating in the Program. This individual will work in conjunction with the program participants to maintain a cadre of comprehensive services.
2. Coordinate with ORCA protocols for referring returning citizens to appropriate services, including income assistance programs, child care, and disability services.
3. Establish protocols to ensure returning citizens have the insurances and benefits they are entitled to receive prior to and upon release.
4. Coordinate with ORCA when reentrants' families are common to both agencies and are participating in the DC Reentry program to ensure appropriate, comprehensive and non-duplicative services are provided.
5. Maintain records on the number of returning citizens referred, participating, and completing agency services.
6. Assign its Director or designee to participate as a member of the Commission on Reentry.

L. THE DEPARTMENT OF GENERAL SERVICES (DGS) will:

1. Assigned a representative of DGS who is fully knowledgeable of all of the DGS construction, renovation, and operational services to coordinate with ORCA job developer's opportunities to participate in WIP and general operational services.
2. Coordinate with ORCA protocols for referring returning citizens for employment, on the job training, and supplemental services i.e. emergency snow removal etc.
3. Inform ORCA when employment announcements are posted and assist applicants in the application process i.e. ranking factors, criminal disclosure forms, etc.
4. Maintain records on the number of referred returning citizens receiving jobs, participating in training and participating in supplemental services

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thru DGS MOA's and make those records available to ORCA case managers on an as needed basis.

M. THE DEPARTMENT OF PUBLIC WORKS (DPW) will:

1. Continue to coordinate with ORCA protocols for referring returning citizens to the existing CDL training program under the MOU with DPW and ORCA.
2. Develop and implement MOU for utilizing returning citizens in the abatement of nuisance vacant lots throughout the District, which allows ORCA participants to assist DPW staff on the abatement of vacant lots while learning job development skills.
3. Inform ORCA when employment announcements are posted.
4. Designate five (5) leaf season positions to ORCA participants.

N. THE DEPARTMENT OF CONSUMER AND REGULATORY AFFAIRS (DCRA) will:

1. Continue to coordinate with ORCA protocols for referring returning citizens to the ongoing DCRA/ ORCA abandoned house abatement supplemental staffing program, which allows ORCA participants to assist DCRA contractors and staff on the abatement of abandoned houses in the District of Columbia.
2. Refer ORCA participants for the upcoming DCRA inspector course which will be offered by the University of DC Community College.
3. Refer ORCA participants who are participating in the abandoned house abatement program to DCRA contractors working on abatement projects.
4. Inform ORCA when employment announcements are posted and assist its applicants in the application process.

O. THE DEPARTMENT OF HEALTH (DOH) will:

1. Coordinate with ORCA protocols and point-of-service information for referring participants to appropriate reentry services, including:
 - a) Addition Prevention and Recovery Administration (APRA) – For addiction treatment and aftercare services.
 - b) HIV/AIDS Administration (HAA) – for health care and community services for individuals with HIV/AIDS.
2. Assign a representative of DOH who is fully knowledgeable in all DOH protocols to coordinate DH pre-release activities in conjunction with other organizations participating in the DC Reentry Initiative. This individual

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will work in conjunction with ORCA participants to maintain a cadre of comprehensive services.

4. Provide assistance through the Bureau of Vital Statistics to obtain birth certificates, etc.
5. Maintain records on the number of referred, participating, and completing agency service and make those records available to ORCA case manager on as needed basis.
6. Assign its Director or designee to participate as a member of the Commission on Reentry.

P. THE DEPARTMENT OF MENTAL HEALTH (DMH) will:

1. Assign a representative of DMH who is fully knowledgeable in all DMH protocols to coordinate pre-release activities in conjunction with other organization participating in the DC Reentry Initiative. This individual will work in conjunction with DC Reentry Program to maintain a cadre of comprehensive services.
2. Coordinate with DOC and ORCA to establish protocols for referring adult reentrants to appropriate reentry services prior to release.
3. Maintain records on the number of returning citizens referred, participating, and completing agency services and make those records available to ORCA case managers on an as needed basis.
4. Assign its director or designee to participate as a member of the Commission on Reentry.

Q. THE DEPARTMENT OF MOTOR VEHICLES (DMV) will:

1. Coordinate with the ORCA to establish protocols through which returning citizens can gain valid government identification cards at the time of release from incarceration.
2. Maintain records on the number of offenders applying for, receiving, or not receiving valid government identification at time of release and make those records available to ORCA case managers on an as needed basis.
3. Respond to release for information from District and federal agency parties to this MOU concerning whether persons identified as returning citizens on such requests have been issued identification cards. The request shall contain such identification information, as DMV requires in order to furnish an accurate response.
4. It is acknowledged that 18 DCMR Section 212.100 provides that after action on an application for an identification card, DMV "may not "retain in the files any information other than the name, address, age of applicant to whom the card is issued, the date of issuance and a reference to the document(s) relied upon in verifying the identity of the applicant".

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5. Assign a representative of DMV who is fully knowledgeable in all DMV protocols to coordinate DMV pre-release activities in conjunction with other organizations participating in the DC Reentry Initiative. This individual will work in conjunction with DC Reentry Initiative participants to maintain a cadre of comprehensive services.

R. THE COMMUNITY COLLEGE OF THE DISTRICT OF COLUMBIA WILL:

1. Coordinate with DOC and ORCA protocols for returning citizens participating in the DC Reentry Initiative to apply for appropriate college programs for which returning citizens may be eligible.
2. Maintain record on the number of returning citizens applying for, being accepted to, being rejected from, and completing community college programs and make those records available to ORCA case managers on an as need basis.
3. Assign a representative to do CASAS testing for Returning Citizens interested in Community College programs.
4. Assign its Director or designee to participate as a member of the Commission on Reentry.

S. THE D.C. DEPARTMENT OF HUMAN RESOURCES WILL:

1. Maintain records on the District's criminal background and drug testing policy, including information on the number of individual's with criminal histories who are found suitable/unsuitable for employment with the District government.
2. Coordinate with "Project Empowerment" at the Department of Employment Services to connect returning citizens with training and assistance with applying for and writing ranking factors for District government positions.
3. Participate in "roundtables" with the Criminal Justice Coordination Council on additional strategies to educate returning citizens on the application, background check, and hiring process at DCHR.

T. COURT SERVICES AND SUPERVISION AGENCY:

1. Refer qualified individuals to ORCA for reentry services under the DC Reentry Initiative.

U. UNITED STATES PAROLE COMMISSION:

1. Refer qualified individuals to ORCA for reentry services under the DC Reentry Initiative.

V. UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA:

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1. Refer qualified individuals to ORCA for reentry services under the DC Reentry Initiative.

X. FEDERAL BUREAU OF PRISONS:

1. Refer qualified individuals to ORCA for reentry services under the DC Reentry Initiative.

IV. TERMINATION

Any party may terminate the MOU upon thirty (30) calendar days prior notice to all other parties in accordance with Section V. Upon notice of termination, all parties shall complete any business with any other party by the date of termination listed in the notice.

V. NOTICES

Any notice required pursuant to this MOU shall be in writing and shall be deemed to have been delivered and given for all purposes (a) on the delivery date if delivered by confirmed facsimile or delivered personally to the Party to whom the notice is addressed; (b) one (1) business day after deposit with a commercial overnight carrier with written verification of receipt; or (c) five (5) business days after the mailing date, whether or not actually received, if sent by US Mail, return receipt requested, postage and charges prepaid or any other means of rapid mail delivery for which a receipt is available. Notice shall be sent to the contact point for each party listed in "Addendum A. Points of Contact for the Parties".

VI. RELATIONSHIP OF PARTIES

Nothing in this MOU will be deemed, constructed, or implied by any party, or by any third party, as creating the relationship of principal and agent, partners, or joint ventures among the parties. It is further agreed no provisions of this MOU or any Acts of the parties creates a contractual relationship or any third-party beneficiaries. No employees of any party to this MOU shall become an employee of any of the other parties by virtue of this MOU.

VII. FEDERAL AGENCIES

All parties expressly understand that the Court Services and Offender Supervision Agency for the District of Columbia, Federal Bureau of Prisons, United States Parole Commission, and the United States District Court for the District of Columbia are agencies of the United States and participate in this MOU solely as cooperating partners. Nothing in this MOU is intended to be, nor will be considered as a waiver or relinquishment by the listed federal agencies of their rights to claim such exemptions, privileges, and immunities as may be provided by the law.

VIII. GENERAL PROVISIONS

1. All participating agencies agree that they and their employees will comply with all applicable laws, rules and regulations whether now in effect or hereafter enacted or promulgated.
2. If any part of this MOU is contrary to any law or regulation, it is not applicable and such invalidity shall not affect the other provisions or applications of this MOU which can be given effect without the invalid provisions or application and to that end the provisions of this MOU are declared to be severable.
3. This MOU can be amended only by written MOU signed by all parties
4. The Parties acknowledge and agree that nothing in this MOU creates a financial obligation in anticipation of an appropriation and that all provisions of this MOU, or any subsequent agreement entered into by the parties pursuant to this MOU, are and shall remain subject to the provisions of (i) the federal Anti-Deficiency Act, 31 U.S.C. §§ 1341, 1342, 1349, 1351, (ii) the District of Columbia Anti-deficiency Act, D.C. Official Code §§ 47-355.01-355.08, (iii) D.C. Official Code § 47-105, and (iv) D.C. Official Code § 1-204.46, as the foregoing statutes may be amended from time to time, regardless of whether a particular obligation has been expressly so conditioned.
5. The agreement does not, and shall not be construed to, create any rights, substantive or procedural, enforceable at law by any person in any matter, civil, or criminal.
6. Each party is responsible for its own conduct under this MOU, and retains all defenses, including immunities, available under federal and District laws and regulations. No party agrees to insure, defend, or indemnify any other party.
7. Each Party shall promptly inform the other Party of any information related to the provision of services under this MOU, which could reasonably lead to a claim, demand or liability of or against the other Party or the District by any third party.
8. The headings in this MOU are for purposes of reference only and shall not limit or define the meaning of any provision hereof. This MOU may be executed in any number of counterparts, each of which shall be deemed to be an original, but all of which together shall constitute one and the same document.
9. By executing this MOU, each Party represents to the other Party that it is authorized to enter into this MOU, that the person signing on its behalf is duly authorized to execute this MOU and that no other signatures are necessary.

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IN WITNESS WHEREOF, the parties and participating federal partners hereto have executed this MOU as follows:

Charles Thornton _____ 2/11/13
Director, Office of Returning Citizen Affairs Date

[Signature] _____ 05/30/2013
Office of the City Administrator Date

[Signature] _____ 2/21/13
Deputy Mayor for Public Safety and Justice Date

[Signature] _____ 3/7/13
Deputy Mayor for Planning and Economic Development Date

[Signature] _____ _____
Deputy Mayor for Health and Human Services Date

[Signature] _____ 3/4/13
Deputy Mayor for Education Date

[Signature] _____ 2.20.13
Criminal Justice Coordination Council Date

[Signature] _____ 2/11/13
The Department of Employment Services Date

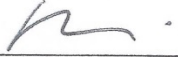
[Signature] _____ 2/11/2013
D.C. Department of Corrections Date

David G. Burns _____ 2/11/13

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Department of Human Services

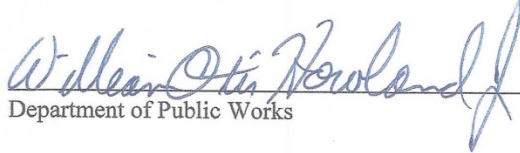
Date



2.11.13

Department of General Services

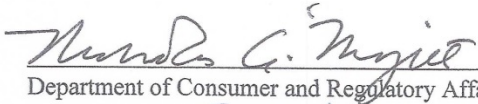
Date



2-11-2013

Department of Public Works

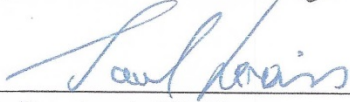
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2/21/2013

Department of Consumer and Regulatory Affairs

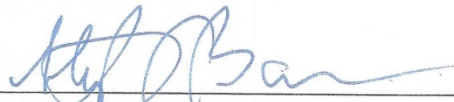
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2/11/2013

The Department of Health

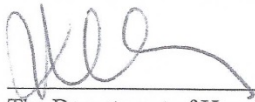
Date



2/11/13

The Department of Mental Health

Date



2/11/13

The Department of Housing and Community Development

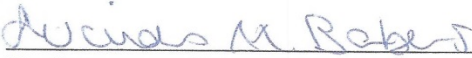
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2/11/13

D.C. Department of Human Resources

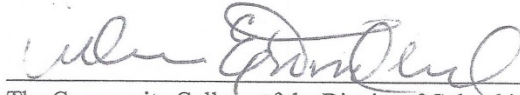
Date



2/11/13

The Department of Motor Vehicles

Date



2/20/13

The Community College of the District of Columbia

Date

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Ch. L. Samuels
Federal Bureau of Prisons

5-8-13
Date

Wanda Moore
Court Services and Supervision Agency

2/5/13
Date

Isaac Fulwood
United States Parole Commission

2/5/13
Date

Sennie A. Hager
United States District Court for the District of Columbia

2/5/13
Date