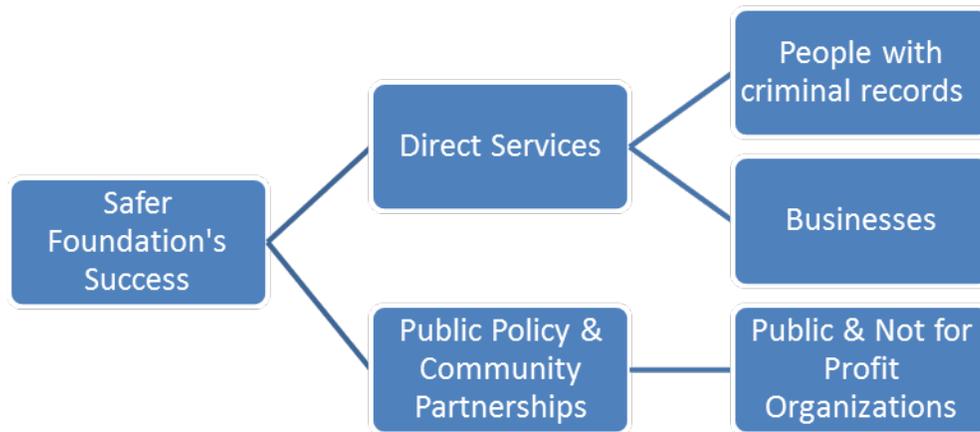


# IMPROVING EFFICIENCY AND OUTCOMES THROUGH COLLABORATIONS: AN NGO PERSPECTIVE

*B. Diane Williams*

## I. INTRODUCTION

Safer Foundation (Safer) is a not for profit organization headquartered in Illinois but also operates either directly or through technical assistance grants in three other Midwestern states, Iowa, Missouri and Wisconsin. Its mission is to reduce recidivism by providing services to people with criminal records to help them become law abiding employed citizens. To accomplish its mission, Safer does not limit itself to direct services but also includes developing and leading public policy reform efforts. Its partnerships are critical to every facet of its work.



Incorporated in 1972, Safer set the course for assisting justice involved individuals. The organization has avoided "mission creep"(pursuing projects that are not truly aligned to the organization's mission) and stayed the course. Because of that level of discipline thousands of people with criminal records are employed, supporting their families, and contributing to their communities. Tax payers have saved millions of dollars and while in the United States crime in

some places have remained at unacceptable levels; there are fewer victims because of Safer's work. Also, because of Safer's work fewer people return to Illinois' prisons and jails. Employers have new employees who are excited about going to work and are thankful for the opportunity. Tax collection revenue for state and federal governments is higher and local merchants' sales increase.

When considered in the context of the number of people under corrections supervision the results are even more laudable. At the end of June 2014 (the most recent data available) the Illinois Department of Corrections (IDOC) reported they had 48,921 adult inmates in its prisons of which 94.1 percent were male with an average age of 37 years old.<sup>1</sup> Adult parolees were numbered at 28, 242 adults and 90.7 percent of them were male with an average age of 36 years old.<sup>2</sup> There were 10,200 IDOC staff and only 400 parole officers.

Cook County Jail, the largest jail in Illinois that primarily serves as a remand facility, admits approximately 100,000 individuals annually and averages a daily population of 9,000 adults.<sup>3</sup> The jail is under the jurisdiction of the Cook County Sheriff's office. According to the Circuit Court of Cook County, "the Adult Probation Department receives approximately 14,000 new probation supervision cases annually and has an active caseload of approximately 25,000 probationers, 86 percent of whom have been sentenced for felony offenses."<sup>4</sup> There are 387 adult probation officers in Cook County who are responsible for supervising individuals sentenced to probation. There are 101 additional counties in Illinois which have considerably smaller jail populations.

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<sup>1</sup> Illinois Department of Corrections Annual Report 2014, pp. 64-68.

<sup>2</sup> Ibid.

<sup>3</sup> Cook County Sheriff's Office. *Cook County Department of Corrections*. Available at [http://www.cookcountysheriff.org/doc/doc\\_main.html](http://www.cookcountysheriff.org/doc/doc_main.html)

<sup>4</sup> State of Illinois Circuit Court. Adult Probation Department Profile. Available at <http://www.cookcountycourt.org/ABOUTTHECOURT/OfficeoftheChiefJudge/ProbationDepartments/ProbationforAdults/AdultProbationDepartment/Profile.aspx>

The disproportionate ratios between the number of community supervision officers to the number of people under community supervision makes evident the need for not for profit support in the community. While government provides direct services to those under its supervision through parole, prison, and probation staff, having effective partners at strategic points in the service continuum can improve the likelihood government will meet its goals to improve community safety, reduce recidivism and effectively manage the cost to provide corrections services. Ideal candidates for strategic partnerships are Safer Foundation and other not for profits.

This paper will look at Safer Foundation, it's history, how its structured to serve the criminal justice population , what it achieves and how, performance outcomes, partnerships, and finally, challenges facing the organization. Know that there are differences in how not for profits are structured and how they do their work, but all are intent on providing societal benefit.

## **II. SAFER FOUNDATION'S HISTORY**

Safer was founded in 1970 by two men working for the Portland Cement Association in Chicago. Under contract with the Federal Bureau of Prisons, Portland Cement provided training in cement masonry in federal prisons in three states. Noting that inmates were not finding jobs upon release, the Federal Bureau of Prisons (BOP) asked the Portland Cement Association (the Association) to develop a programme to help place men being released from federal institutions into construction industry jobs. The Association's leadership accepted the challenge and assigned Bernie Curran, who worked in the external affairs department at the time, and Gus Wilhelmy to manage the BOP job placement contract along with their other duties.

A year later, the Association's leadership decided the programme was not a good fit and wanted to be relieved of its responsibility. Bernie and Gus believed in the mission and elected to lead the programme as a separate entity. They initially co-located with another not for profit focused on criminal justice issues and worked with the Association to secure 501C3 tax exempt status. The new entity was called "Safer" Foundation to represent the founders' desire to keep communities safe.

During the early stage of the organization's development, Safer only had the federal contract and, therefore, only placed people from the federal system. The organization was mostly staffed with volunteers though some of them "worked" full time. The volunteers were people with criminal records and others from the community who cared about helping people change their lives. These individuals worked together, but not always peacefully. One of Safer's long time board members recalls a time that one of the clients physically attacked him. The board member was not hurt nor was he deterred from his commitment to support Safer's efforts. After Safer received an increase in the amount of its federal grant, it began to hire people in paid positions.

As grant opportunities for state and local governments became available Safer expanded its reach, but stayed true to its mission to secure employment for people with criminal records and improve community safety. Today Safer serves between 8,000 and 12,000 people each year with nearly 300 staff in community based residential, community based non-residential and institutional settings. Its third and current President and CEO has significant corporate experience and is leveraging that experience to expand how Safer works with its clients and corporate partners.

## **II. SAFER STRUCTURE**

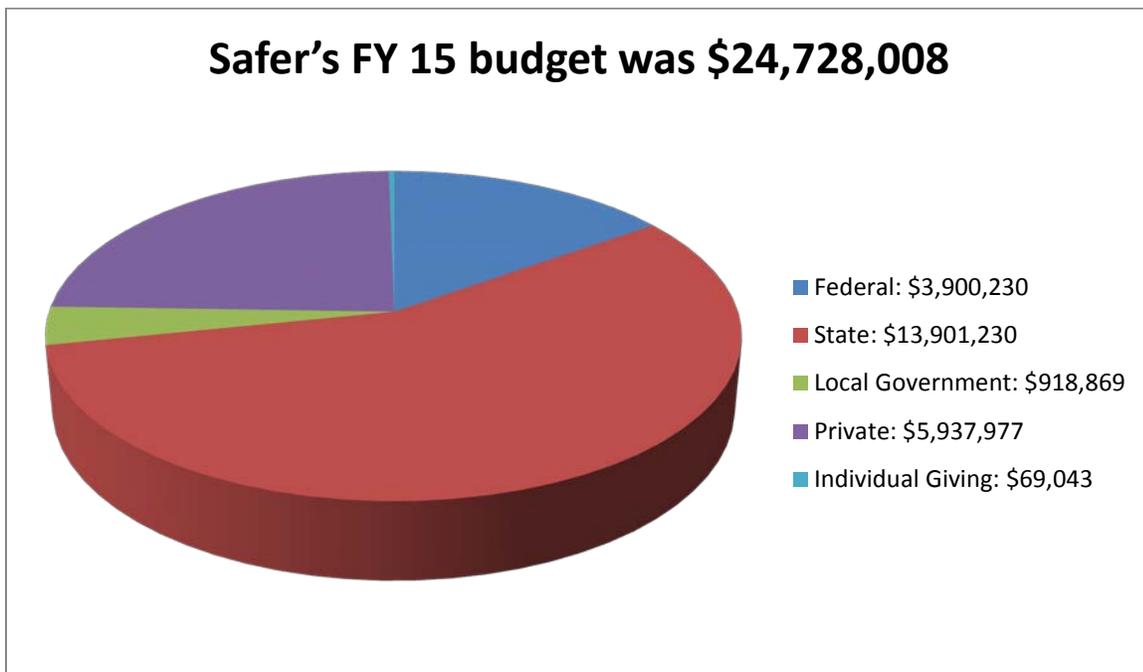
### **A. Governing Board**

United States federal tax law requires not for profits to have a volunteer board of directors who do not personally benefit financially from their work on the board. Not for profits review the expertise needed to direct the activities of the organization and engage individuals who can and are willing to add their skills and knowledge to the governance of the organization. Safer's by-laws allow up to 30 board members, but for practical reasons Safer does not seek 30 individuals. Safer's board members have expertise in policing, banking, legal systems, business leadership, marketing, policy, finance, not for profit management, and some have criminal records.

### **B. Funding and Endowment Board**

Safer receives multi-year government funding for its Adult Transition Programmes and other initiatives. Many of the contracts, even though they are multi-year, require renewal annually and are based on both outcome and budget management performance. In addition to government contracts Safer receives funding from private foundations which range in amounts as small as \$5,000 to a five year grant of \$5,000,000. Safer is very adept at recognizing what services need to be provided for its clients' success. The organization works to secure dollars from one source if possible but will blend funding streams when appropriate and necessary. For example, some funders are willing to support educational programming while others may only want to fund job training. Services for one client that includes education services and job training would be supported by both funding sources.

Safer's financials are audited annually by external independent auditors to ensure government and funder requirements are met. Safer has been recognized by government agencies and private foundations as outstanding in the management of its financial resources. Early adoption of a cost accounting system allows Safer's funders to follow their grant dollars through the finance system and ensure that the dollars are expended as directed.

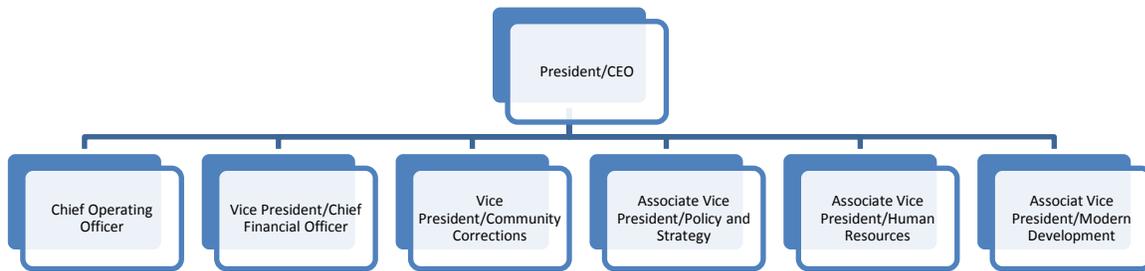


Prior to 1995 Safer established an Endowment to hold all real assets (property) and to serve as a place for collecting donations to be managed over more than one year. The Endowment exists only to serve Safer. When projects warrant's additional funding and support that cannot be attained anywhere else, the organization can apply to the endowment for a grant. The Endowment also affords Safer a budget safety-net when grant and contract payouts are not timely. For example, today the State of Illinois is in its 7<sup>th</sup> month of the fiscal year and it has not passed a budget. Some not for profits that have solely relied on government contracts to pay for their services have had to close their doors because they could not sustain themselves during

these restrictive periods of time. Safer’s good credit standing and credit line, access to discounted payouts, and funds that are available through the Endowment has made Safer a strong not for profit that can continue its operations at the same level year to year.

**C. Staffing**

Safer Foundation has nearly 300 employees and its operations and staffing structure reflects its blended social service- public policy-business model its internal structure and staffing reflects all three. Several positions are direct reports to the President/CEO so that every aspect of the organization’s operations is consistently given directly to the President/CEO.

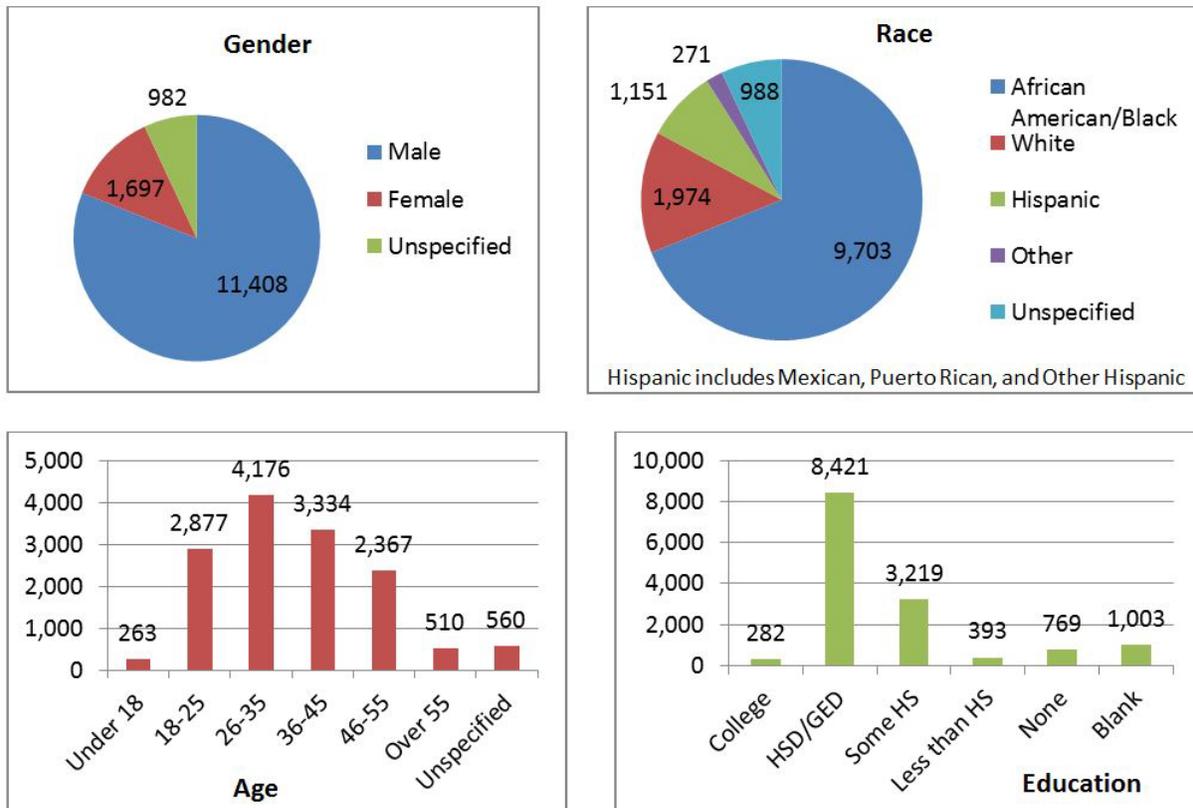


All staff receives competitive compensation packages consistent with their positions. Healthcare, retirement assistance, the same number of paid holidays as their government counterparts, sick and vacation time are available to employees. While Safer experiences turnover for lower level jobs in the organization Safer is a stable organization with some employees having over 30 years tenure at Safer.

**D. Safer Foundation Employment Model**

Safer Foundation’s primary goal is to connect its clients to jobs that provide living wages that will allow them to care of themselves and their families. Safer provides employment

services exclusively to workers with criminal histories and all of its services work together to achieve the goal of long-term employment. Safer’s clients are predominantly male, minority (in the case of Safer, African American), undereducated, and come from communities with high rates of unemployment, high rates of crime, and single family households.



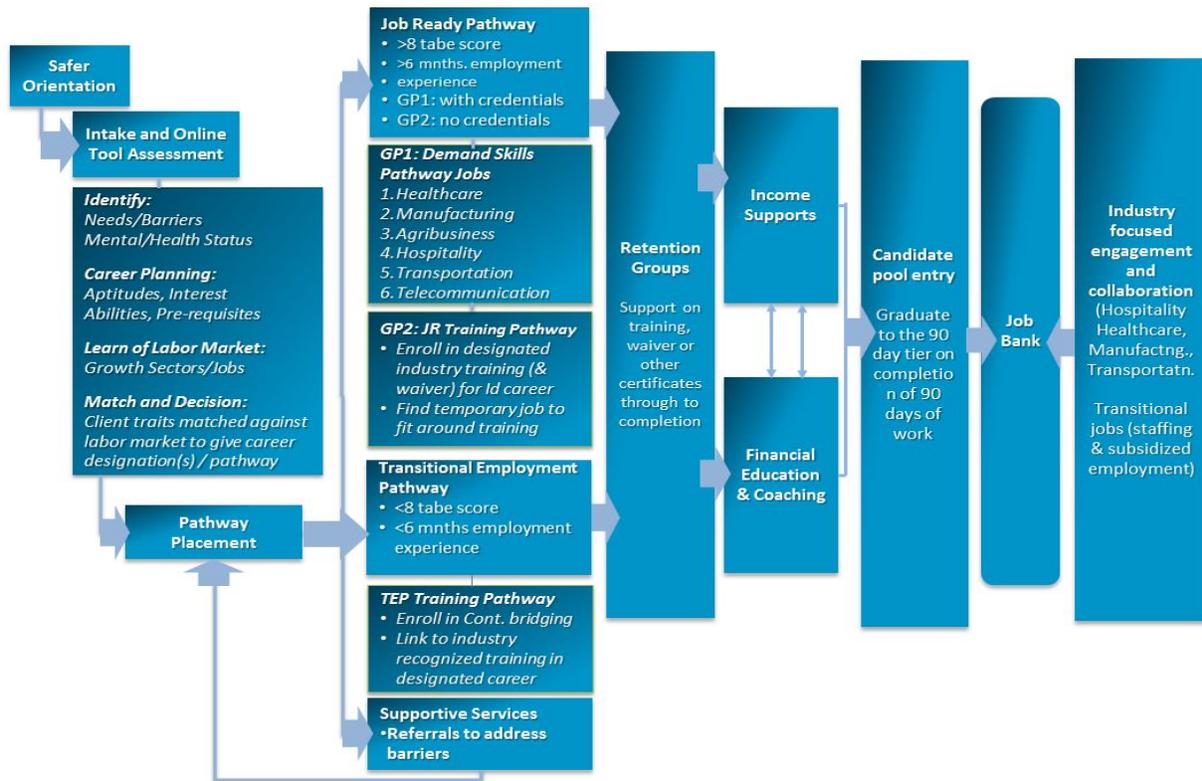
According to a report from the Urban Institute, a three state study found approximately 0% of people released from prison were employed at the time of arrest and the 60% who were not employed had never held legitimate jobs.<sup>5</sup> Most of the men are non-custodial parents. While a fair number of women have children for whom they resumed custody after release, many who come to Safer are in the midst of fighting to regain custody of their children. Safer provides

<sup>5</sup> Visher, C., Debus, S., & Yahner, J. (October 2008). “Employment after Prison: A Longitudinal Study of Releasees in Three States.” Research Brief. *Urban Institute*. Available at <http://www.urban.org/sites/default/files/alfresco/publication-pdfs/411778-Employment-after-Prison-A-Longitudinal-Study-of-Releasees-in-Three-States.PDF>

an array of services directly or in partnership with other community based organizations that include:

- Mentoring
- Educational Intervention
- Service Learning
- Expungement and other civil legal service support
- Substance Abuse Treatment
- Employment Services
- Industry Training
- Mental Health Services
- Follow-Up

### Safer Foundation’s Screening Process: Retention Services Model



Private sector employment is the organization’s goal and is accomplished primarily from Safer’s demand-driven workforce development model where the agency helps employers find qualified workers, retains them and increases their skills to increase their effectiveness on the job after placement. Safer’s orientation process includes assessing the client’s needs and identifying

any issues that may impede its ability to place the client in a traditional job. In this phase the client is also tested to determine his/her aptitudes, interests, abilities, and pre-requisites. Clients are then placed on one of three pathways to determine their employment service track: “job ready” with or without credentials; transitional employment; or supportive services to first address employment barriers. A “job ready” client who has credentials and a work history is matched to current real-time job opportunities. Clients who do not have credentials but some work history are placed in a skills training programme and connected to temporary employment opportunities that fit around their training schedule. Clients who do not have any skills or work history are placed in transitional employment that is time-limited, wage-paying jobs that combine real work, skill development and support services.

The transitional employment services provide an opportunity to help them overcome substantial barriers to employment and establish a work record. The transitional jobs are through Safer’s staffing company or through other subsidized employment opportunities. Upon completion of the transitional employment phase, the client’s pathway is reassessed for career planning to begin. All of Safer’s clients receive job preparedness training and job coaching services in addition to the skill development.

Safer has strong relationships in most industries but a strategic decision was made to target industries that needed skilled candidates and had opportunities that could be open to its clients if they received important services like academic bridge programme,<sup>6</sup> job readiness training, industry recognized credentials and job placement services. Safer created a Demand Skills Collaborative that integrates both its demand-side and supply-side workforce development services. Safer uses an employer-driven employment model that includes identifying high-

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<sup>6</sup> Academic bridge programmes provide students with opportunities to acquire knowledge and skills that will increase their transfer eligibility and academic success in a particular field or industry.

growth occupations; preparing justice-involved individuals to compete for those jobs by focusing on employers' expectations for skilled; productive and dependable employees with good personal management skills; and providing industry-standard training and certifications.<sup>7</sup> The industries Safer focuses on are healthcare, manufacturing, agribusiness, food service/hospitality, transportation, and telecommunications. The industries are referred to as hubs.

Healthcare is a major industry hub, for example, because in Chicago, IL there are thousands of open healthcare positions. In fact, in the United States the healthcare industry is forecasted to have significant worker shortages because of a lack of skilled workers to meet the growing demand for healthcare services.<sup>8</sup> High-tech manufacturing companies have expressed concern that there are not enough trained workers to fill key positions. Therefore, with this industry and job analysis, Safer has identified several jobs for which its clients have the opportunity to earn credentials and build careers. Their options are as diverse as advanced manufacturing, commercial truck driving, welding, and new fields like cellular wireless tower engineering and urban and rural farming.

The Demand Skill Collaborative partnership consists of businesses that have a demand for labor; training organizations that can deliver industry recognized credentials; a workforce development intermediary to identify and screen qualified candidates and deepen employer relationships; funders to bring resources to the demand driven model; and industry experts who can provide understanding of terminology, trends, certifications and industry needs. The success of the Collaborative requires the partners to have a deep (and mutual) understanding of the labor

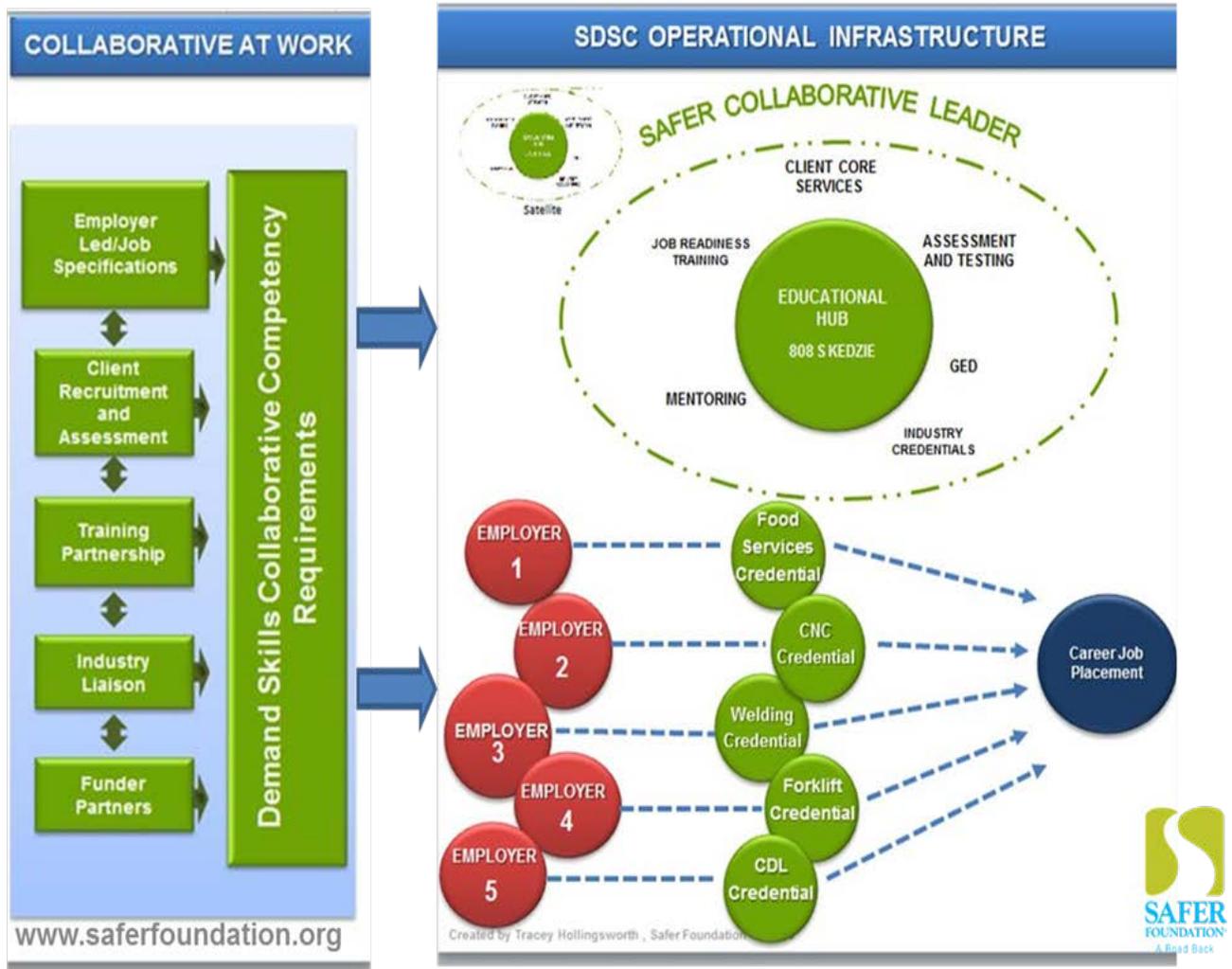
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<sup>7</sup> National Institute of Corrections. "The Employer-Driven Employment Model for Justice-Involved." Accessed January 14, 2016. Web. <http://nicic.gov/employerdrevenemploymentmodel>

<sup>8</sup> Lennon, Chauncey. "Jobs in Health Care on the Rise, but Skills Gap Prevents Hiring: Companies and civil leaders need to collaborate on employment-training opportunities." Editorial. *USNews.com*. N.p., 17, Feb. 2015. Web. 14, Jan. 2016. <http://www.usnews.com/news/stem-solutions/articles/2015/02/17/op-ed-jobs-in-health-care-on-the-rise-but-skills-gap-prevents-hiring>

market, its needs, issues and potential solutions. This workforce model provides a deeper level of employer engagement, is driven by employers' need to increase outcomes, and is designed to put candidates on a career pathway with a strong outlook that would lead to financial stability. Safer in the end can successfully train and place its clients in high demand, higher paying occupations.

### Safer's Demand Skill Collaborative Model



### E. Sheridan Prison Model

In 2004, then Illinois Governor Rod Blagojevich re-opened the Sheridan Correctional Centre in an attempt to make Illinois a national model for drug crime prevention within the

correctional system. The governor recognized that a high percentage of people in prison were drug addicted and without access to treatment they would resume the use of illegal drugs upon their release from prison. If the participants were successful in this programme they would be less likely to recidivate by buying, using and selling drugs.

Three not for profit agencies were selected to provide services that started inside the prison and supported a seamless transition to community no matter where the inmates were released within the state. Illinois Treatment Alternatives for Safer Communities (TASC) provided case management services, WestCare Foundation provided substance abuse treatment services, and Safer Foundation delivered employment services. During the admission process inmates classified as medium security level were given an opportunity to acknowledge a problem with drugs and/or alcohol and agree to treatment.

Inside the prison a modified therapeutic community model offered participants the chance to learn the skills, techniques and strategies to manage addiction challenges. Participants also learned how to work with and depend on others. Case management staff, like the staff of the other programme segments had assigned work spaces in the prison and met with their clients individually on a regularly scheduled basis and in group sessions. An evidence-based curriculum was used to deliver skill training.

Safer used its screening and retention employment model that was discussed but a few additional components were added to support the program features. A module on supervisory training for correctional officers taught them how to set expectations, review performance against expectations and give feedback. This was particularly important since one of the consistent problems for justice-involved individuals in the workplace is accepting feedback and responding positively to criticism. Both correctional officers and inmates appreciated this aspect of the training. Safer created evaluation checklists to facilitate the evaluation and feedback.

Another change to the standard curriculum was the extensive use of role play with constructive feedback, again giving participants an opportunity to practice both giving and receiving feedback. Finally, employers were brought into the prisons to provide interview practice for some participants and actual job interviews for those that were going to be released from prison within a reasonable period of time. Prior to the client's release, case managers worked with the men to develop community reentry plans. Connection to treatment, mentors, employment services, and community based case management were some of the components of the plan.

In the 2005 IDOC annual report results from a one year study comparing the first 150 inmates released from Sheridan with a control group; "12 percent of Sheridan parolees were rearrested compared to 27 percent of the other group (roughly 55 percent reduction); and that 2 percent of Sheridan parolees were re-incarcerated compared with over 10 percent of the other group (a roughly 66 percent reduction).<sup>9</sup>

Evaluations were done at scheduled time intervals. While the percent of difference between participants and control groups fluctuated, inmates who engaged in the treatment programme recidivated at a lower rate than those who did not.

Unfortunately, budgetary constraints and administration changes resulted in a shift from a facility dedicated to treatment to one that was overcrowded. Employment services inside the prison were discontinued and overcrowding in the prison system has spilled over to Sheridan. However, this model when implemented properly does work and should be considered as an option.

#### **E. Policy Work**

As a result of Safer's long history, large service pool, and exclusive service experience with people with criminal records the agency is invited often to sit on federal, state and local

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<sup>9</sup> Illinois Department of Correction Annual Report Fiscal Year 2005, p. 12.

policy boards and task forces that are charged with developing programmes and policies that would have the greatest positive impact.



In 2001, Safer formed the Council of Advisors to Reduce Recidivism through Employment (CARRE), to organize supportive communities of people and organizations working to support the reentry needs of justice-involved individuals. CARRE is made up of 100 members representing leaders of support groups, community organizations, employment and supportive service nonprofits, government agencies, faith-based groups, civil and human rights organizations, universities, and elected officials across the City of Chicago that work together with public policy advocates, employers, and legislators to develop and implement strategies to reduce barriers to employment and encourage successful reentry.

CARRE has worked together to successfully advocate for policy changes that support reentry such as expansion of the State's expungement and sealing of criminal records to creating employment programmes inside and outside of the jails and prisons. CARRE has also helped

increase educational and employment opportunities for formerly incarcerated individuals by working to build political will for support for reentry and by eroding the stigma associated with criminal record. The group has produced and issued policy papers and conducted campaigns that have effectively built public and political support for prisoner reentry programmes. These efforts have led to the creation of several new laws that created hiring standards for the consideration of job candidates with criminal records, restoration of civil rights through a certificate of relief of disability, employer tax credit, and negligent hiring protections for businesses. The group also works together to change the City of Chicago's hiring standards and develop Cook County ordinances that increased housing and employment services in the county. CARRE secured nearly a quarter of a million dollars in grants for policy and advocacy groups that provide free legal services, housing assistance, and substance abuse treatment.

#### **F. Partnership Structures**

Traditional government and private sector partnerships have been contract-based with government agencies adapting standard terms for all contractors. The government agency served as the "boss" in the relationship and all other parties' thoughts, opinions, and knowledge were considered subservient to that of government project leaders. Partnerships were also formed based on funding. In some instances State Departments of Corrections secured federal funding that required partnerships with community based organizations. In other situations not for profits secured private foundation funding that required government partners. Although many of these partnerships accomplish the desired results, the struggle and tension that arise from the unequal power dynamics of the partnership significantly affects implementation and long term maintenance of the relationship.

Jennifer M. Brinkerhoff, Professor of Public Administration and International Affairs at George Washington University in Washington, DC in “Government-Nonprofit Partnership: A Defined Framework” defines the ideal type of partnership:

“Partnership is a dynamic relationship among diverse actors, based on mutually agreed objectives, pursued through a shared understanding of the most rational division of labour based on the respective comparative advantages of each partner. Partnership encompasses mutual influence, with a careful balance between synergy and respective autonomy which incorporates mutual respect, equal participation in decision making, mutual accountability and transparency.”<sup>10</sup>

She goes on to note that “Partnership is promoted both as a solution to reaching efficiency and effectiveness objectives...”<sup>11</sup> Partnership as defined by Professor Brinkerhoff is exactly right. The best outcomes are generated when all participants are allowed to offer relevant input with an expectation of serious consideration of all participants’ suggestions.

Organizations like the Safer Foundation have established credibility and built relationships for over 40 years. When negotiating contract terms and conditions, performance measurements, and the process for correcting problems these agencies and the government body should work together to include specifics that are relevant to work that will be done rather than using general terms set for all contracts.

Not for Profits operating in the states are more likely to be involved in early discussions for new initiatives. However, if contracts are to be let as a result of those agreements care has been taken to not give any organization an unfair advantage. Today you are more likely to see early inclusion in planning particularly since many federal grants require it. In addition to government partnerships, not for profits partner with other not for profits that offer expertise in

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<sup>10</sup> Brinkerhoff, J.M. (2002, March 12) “Government-Nonprofit Partnership: A Defined Framework.” *Public Administration Development*. Vol. 22, n.1.

<sup>11</sup> Ibid.

different areas as was noted in the discussion on Sheridan. These partnerships may be formed to seek funding, but in many cases they are formed to better serve their clients.

## **F. Performance Outcomes**

Safer utilizes a scorecard to measure its effectiveness internally. The four major quadrants with metrics are Mission, Internal-Human Capital Effectiveness, External Market Effectiveness, and Finance. Quarterly reports are provided to the board and used as a management tool within the organization.

Measurements that are included but also reported externally are the number of Safer clients achieving employment in a given year, three year recidivism rates for Safer clients as determined by academic institutions focused on criminal justice programme evaluation.

Safer's website ([www.saferfoundation.org](http://www.saferfoundation.org)) proudly displays its success in placing people in jobs. The banner reads "4,200+ Safer client job starts per year." Client job retention rates are also reviewed at 30, 90, 180 and 365 day markers.

In 2011, Loyola University released a report on the recidivism rate of individuals who received employment services from the Safer Foundation. Loyola tracked clients from FY2008 to FY2011. The study concluded that the recidivism rate for individuals who received Safer's employment services and achieved employment was 24.3 percent.<sup>12</sup> The three-year recidivism rate for Safer Foundation clients who achieved 30-day employment retention was 17.5 percent, a 63 percent lower recidivism rate than the statewide recidivism rate of those released from prison during the same time period, 47.0 percent based on the IDOC FY2011 recidivism percent for

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<sup>12</sup> Safer Foundation Three-Year Recidivism Study 2008. Loyola University tracked clients from FY2008 to FY2011. Web. Access 2016, January 10.  
<http://www.saferfoundation.org/files/documents/Safer%20Recidivism%20Study%202008%20Summary.pdf>

inmates released in FY2008 from the Illinois Department of Correction and re-incarcerated within three years of release. Among those who went on to achieve 360-day retention, only 15.7 percent recidivated in a three-year period after achieving the 360-day retention.

## **G. Organizational Challenges**

There are internal and external challenges faced by not for profit organizations whose missions are primarily to provide employment services for workers that have criminal histories. Employment organizations in general must understand and be able to navigate the multitude of laws and policies that may impact their ability to place their clients in certain jobs. The negative perceptions and stigma faced by people with criminal conviction records often creates additional challenges with placing them in a well-paid position. When the economy and the labor market are in a down turn, workers with criminal records are rarely considered because there is significant competition for jobs.

Employment and housing are considered the biggest challenges that have the greatest influence over an individual's success of remaining crime free. Nearly 50 percent of individuals in jails were unemployed at the time of their arrest and between 60percent and 75percent of formerly incarcerated people are jobless up to a year after release.<sup>13</sup> Moreover, homelessness often precipitates incarceration. Individuals incarcerated in jails are 11.3 times more likely to be homeless than the general population and 15percent of people in prison previously experienced homelessness.<sup>14</sup> While employment is a critical need, housing is the most immediate challenge faced by people leaving prison. The employment challenges faced by the people with criminal

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<sup>13</sup> Petersilia, J. *When Prisoners Come Home: Parole and Prisoner Reentry*. Chicago, Ill: University of Chicago Press, 2003; Travis, Jeremy, *But They All Come Back: Facing the Challenges of Prisoner Reentry*, Washington D.C.: Urban Institute Press, 2005.

<sup>14</sup> Knopf-Amelung, S. *Incarceration & Homelessness: A Revolving Door of Risk*. In *Focus: A Quarterly Research Review of the National HCH Council*, 2:2. (November 2013). National Health Care for the Homeless Council. Available at: [www.nhchc.org](http://www.nhchc.org)

records are unique to each individual, though there are some commonalities among various subgroups. The level of difficulty faced by an individual during reintegration is often dictated by the personal, criminogenic,<sup>15</sup> and structural challenges that exist for that individual. However, the primary challenge is making sure the organization is expending its resources with clients who want to live up to the challenge of overcoming his or her circumstances.

### **III. Conclusion**

In the United States government agencies provide some direct services but they also rely upon community based organizations to help provide reentry assistance to the justice involved population because of the great numbers of people in need of service and the intensity of their service needs. Safer provides a range of programs and services to help formerly incarcerated individuals find employment. Each year, Safer Foundation helps thousands of people with criminal records choose a new direction of responsibility, education, and productivity. Without intervention, 52 percent return to prison. By contrast, fewer than 22 percent of those receiving Safer's services go back. Its partnership with government agencies and the community at large is critical improving the efficiency of the public safety plans for communities and improving the outcomes that are necessary to change lives and ultimately reduce recidivism.

Reentry services requires the involvement of the entire community that is set to receive a returning citizens and they must be engaged and prepared to positively impact prisoner reentry to reduce recidivism. Safer Foundation will continue to be a part of collaborative efforts that involve law enforcement, service providers, businesses and corrections to develop innovative

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<sup>15</sup> Behaviors or activities associated with crime or criminality

approaches to prisoner reentry and to comprehensively address the transitional needs of both the returning clients and their community.