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PUBLIC SAFETY & LABOR

COMMITTEES
ENERGY, UTILITIES &
COMMUNICATIONS
ENVIRONMENTAL QUALITY
TRANSPORTATION & HOUSING

RE: 30-DAY COMMENT PERIOD ON A REQUEST FOR PROPOSALS FOR THE ADULT REENTRY GRANT PROGRAM – REHABILITATION OF EXISTING PROPERTY OR BUILDINGS PROJECT

September 2, 2019

I am writing to the Board of State and Community Corrections (BSCC) to provide feedback on the Adult Reentry Grant Rehabilitation of Property Project Draft Request for Proposals.

The following are my major concerns related to:

1) Grant Eligibility. With the current RFP language, a qualifying bidder must have provided “housing services to homeless persons or persons at risk of homelessness for a minimum of three years” (page 3). This significantly broadens the applicant pool and draws the question of why the BSCC would not limit this program to organizations that provide housing services to formerly incarcerated individuals, which is the target population for this grant.

An additional requirement for eligibility reads, “Should the proposed project be supported by other funding sources, those funding sources must be identified at the time of application” (page 4). This requirement may be difficult to comply with as funding sources often change. I am recommending the following slight modification: “Should the proposed project be supported by other funding sources, those funding sources must be identified at the time of application, *if known.*”

2) Administrative Costs. Under the current RFP, “administrative costs for CBO personnel [are] not to exceed 3% of grant award” (page 5). Understanding the true costs of administering complete projects and compliance requirements, I recommend the administrative cost cap be increased to 5-10%. I believe a higher cap limits administrative costs in a meaningful way while also allowing for a reasonable amount of flexibility to manage all aspects of the project (documentation, subcontracting, invoicing, payment, etc.) efficiently and responsibly.

Page 23 of the RFP reads: “One CBO staff may be funded by the grant for oversight of the grant project.” I am recommending this provision be removed as it doesn’t allow for the flexibility necessary for this type of program.

3) Cash Match. Many programs receive funds from other governmental sources. I would like clarification on whether funds received from other governmental sources may be utilized as the cash match for this program.

Should you have any further questions in regards to the concerns outlined above, please contact my Chief of Staff Marvin J. Deon II at Marvin.Deon@sen.ca.gov or at (916)-651-4009.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Skinner".

Senator Nancy Skinner
Senate District 9



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September 3, 2019

Board of State and Community Corrections
2590 Venture Oaks Way
Sacramento, CA 95833

Re: RFP for Adult Reentry Grant Rehabilitation of Existing Property

Dear Board members,

On September 12, 2019, the BSCC will be asked to approve the Request for Proposals (RFP), which has been drafted by your staff in connection with the awarding of \$15,000,000 in state financing to counties for the rehabilitation of existing property or buildings for housing people released from prison. On behalf of the Center on Juvenile and Criminal Justice (CJCJ), I write to provide our input as researchers, advocates, and service providers affected by the outcome of this decision.

The Center on Juvenile and Criminal Justice is a private non-profit organization that promotes humane criminal justice policies to reduce incarceration and foster long-term public safety in California. CJCJ pursues this mission through the development of model programs, technical assistance, and policy analysis. As such, CJCJ is eager to ensure this RFP effectively supports reentry service providers in meeting the needs of formerly incarcerated individuals returning to the community.

We ask you to carefully consider the following recommendations and concerns regarding the adequacy of the RFP:

Reduce the minimum project grant range. While we recognize the need to consolidate resources for high-impact projects, we are concerned that the proposed project grant range of \$3 million to \$5 million is a substantial requirement may cause barriers to strong applicants. Given that a 20 percent cash match is required, a \$3 million minimum grant may not be feasible for many interested and otherwise-qualified organizations. We recommend the BSCC consider lowering the minimum grant amount to ensure that community-based organizations (CBOs) with smaller project scopes be eligible for these funds.

Expand the eligible services for applicants. The proposed RFP requires that applicants “must have provided housing services to homeless or persons at risk of homelessness for a minimum of three years.” We recommend that the three-year requirement include reentry services and rehabilitative services for justice-involved individuals. CBOs that have a history of serving justice-involved and/or formerly incarcerated individuals through services beyond housing have substantial expertise for implementing successful reentry housing projects.

Clarify the scope of the target population. Based on the proposed RFP, it is unclear if there are any requirements about the number of individuals from the target population that must be served by the facility. For example, text on page 4 reads, “Applicants must use grant funds solely for the purpose of rehabbing property or buildings to house persons formerly incarcerated in state prison,” while other references to the target population imply that persons formerly incarcerated in state prison need only be included in the population served by the facility.

We recommend that eligibility for ARG-funded projects include those that are equipped to serve and/or actively serve individuals with prior state incarceration. Unfortunately, we know that people often come into

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Center on Juvenile and Criminal Justice

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contact with the justice system following incarceration in state prison. The target population should include individuals returning directly from state prison as well as individuals whose previous state incarceration is not their most recent form of contact with the justice system (e.g. individuals on county probation).

Reduce the grant period/project length. We are concerned that the proposed grant period ending in January 2035 creates an unnecessary burden for grantees. In statute, adult reentry grant funds are designated for encumbrance or expenditure by June 30, 2021. Additional annual reporting requirements for a fifteen-year period following the end of grant funding far exceed what is necessary to ensure effective use of grant funds. While we understand the importance of ensuring the long-term success of projects, this extensive grant period creates a barrier to CBOs with limited capacity for administrative costs. If the BSCC should include additional annual reporting beyond 2021, we recommend the grant require annual reporting not exceeding three additional years.

Ensure greater inclusion in future grant-making processes. We are concerned that the development of this RFP was done internally by BSCC staff rather than through the Adult Reentry Executive Steering Committee, which includes an array of subject matter experts critical to the grant-making process. The ESC's participation in this process is critical to ensure that the intentions and principles embodied in the first RFP are respected. Additionally, opportunities for public input into the drafting of the RFP prior to a decision by the Board have been limited for a public works project of this importance. We would greatly appreciate efforts in the future to ensure greater inclusion of members of the ESC and general public.

Thank you for your consideration. Please do not hesitate to reach out via email at renee@cjcj.org or by phone at (415) 621-5661 x. 103 with any questions or concerns regarding CJCJ's recommendations.

Respectfully,

Renee Menart, Communications and Policy Analyst
Center on Juvenile and Criminal Justice