info@ceoworks.org

Returning Citizen Stimulus (RCS) Implementation Guide

April 2022

Center for Employment Opportunities

Introduction

Purpose: This guide aims to provide insight as to why the Returning Citizen Stimulus (RCS) program was created, what it took to design and implement our pilot, and lessons learned along the way. It also touches on the second pilot design and future plans.

Audience and Intended Use: This guide is designed for anyone who intends to speak about the RCS Program, participates in the pilots, or looks to launch another version of RCS. This is a historical analysis and is meant to capture impact and learnings. It is a reference guide for key design elements, decisions, and outcomes of the RCS pilot.

Limitations: This document is not intended to provide every detail and instead focuses on the core elements, decisions, and changes that made RCS successful. The appendix lists the full documents used in this guide. *Note - This is a lengthy document. It may be best to reference the specific sections of key interest using the table of contents above.*

The RCS provided an opportunity for CEO to help those in need immediately, partner with organizations serving a similar population, show the strength of technology-supported interventions, and support policy change with actions.

The main questions for the RCS program design included:

1. **Cash Transfer** - Should there be any actions needed for future payments?
2. **City Selection** - What are the criteria to be used to consider cities as eligible for RCS?
3. **RCS Target Populations** - Who is eligible? How many recipients should there be?
4. **Payment Amount Determination** - How much? How often? For how long?
5. **Partner Selection** - What criteria should we use to contact and select partners?
6. **Payment Method Selection** - How will RCS recipients get payments? What paperwork for taxes must be considered? What benefit impacts may occur from cash payments?
7. **Risk and Quality Assurance Design** - How can we ensure that money is awarded to an individual who fits the criteria and that the individual accesses the money correctly?

The main questions for the supporting infrastructure design and implementation included:

1. **Database Design** - Can existing systems support RCS? What must we change or add?
2. **Evaluation Design** - How can we establish an evaluation that shows RCS's impact?
3. **Original Team Structure Design** - Can existing CEO employees handle the design and implementation of RCS? What skills and supports are needed?
4. **Plan for Implementation** - How do we implement and execute the program design?
5. **Policy Considerations** - What are the policies in play? What policies can we influence?

© 2022 Center for Employment Opportunities | RCS Guide

What is RCS and why was it created?

The Returning Citizen Stimulus (RCS) program is the largest-ever conditional cash transfer to formerly incarcerated individuals. The RCS program was conceived at the onset of the COVID-19 pandemic and offered to individuals enrolled in community based organizations, many of whom were not able to receive federal relief payments or unemployment insurance payments. Providing immediate financial resources after release from incarceration promotes social and economic reintegration. With a decline in work opportunities due to the constraints of COVID-19, cash payment was thought of as another way to provide those immediate financial resources needed post-release. Another major consideration for RCS was the decarceration of people due to the COVID-19 outbreak and being released into an environment where unemployment levels were high and work opportunities constrained.

Individuals returning home from incarceration encounter immense challenges even in the best of times, but it has been exceptionally difficult during the COVID-19 pandemic and subsequent economic downturn. Financial challenges have been most acute in the low-income communities of color that so many incarcerated people call home. To ensure we center equity in our COVID-19 response, we must account for people returning home to these communities.

Immediate access to federal relief funding was significantly harder for people coming home from incarceration, including those who had not filed a tax return for 2018 or 2019 (or filed for Social Security last year), or who may not have necessary documents, a bank account, internet access or a permanent address. Most individuals returning home from prison right now are also not eligible for unemployment insurance if they had not been working at the time of the COVID-19 outbreak. Therefore, many of those most in need of this income won't receive it or will receive it after significant delay. RCS was created to combat these challenges.

The first RCS pilot was implemented in 28 CEO locations with a focus in six high-impact cities: New York City, New Orleans, Los Angeles, Tulsa, Detroit, and Oakland. The pilot took place between April and December 2020, while the development of the concept started in March 2020, in response to stay-at-home orders being issued across the nation and the impact on employment opportunities for formerly incarcerated or justice involved individuals. The pilot involved CEO local and national leadership working in partnership with other community organizations that served the target population of formerly incarcerated adults who are at high risk of being re-incarcerated.

8,000 recipients were targeted and eligible for 3 monthly payments between $2,250 and $2,750 total. CEO distributed over $24 million to RCS participants as of December 2021. These monthly payments were conditional cash transfers provided to participants in the program if they met milestones that were established. Milestones are met by engaging with CEO's evidence-based programming, which may include: attending training sessions, meeting with vocational staff members, or working on a transitional work crew.

© 2022 Center for Employment Opportunities | RCS Guide

RCS Program Design

The Returning Citizens Stimulus (RCS) was created with the following goals:

1. **Emergency cash payments:** Offer conditional cash transfers to approximately 8,000 returning citizens released during the height of the COVID-19 pandemic in 28 CEO sites. These payments will help returning citizens recently released from incarceration and those who recently lost a job to achieve stability. Each recipient will be eligible to receive three monthly payments totaling between $2,250 and $2,750.

2. **Build local partnerships & incentivize better connections to services:** While some RCS recipients are CEO participants, others are being identified through a network of local reentry service provider partners in six high-impact cities (New York City, New Orleans, Los Angeles, Tulsa, the San Francisco Bay Area, and Detroit). The project seeks to use payments to incentivize better connections to reentry services that can lead to improved outcomes in the long term. Denver was later added as a 7th partner city.

3. **Promote policy change:** Through RCS, we seek to encourage states to increase de-incarceration efforts, eliminate criminal justice debt, fines, and fees that burden the recently released, and invest in local reentry services.

4. **Measure impact:** As the largest cash transfer programs for returning citizens, we are working with the independent research firm MDRC to study the effects of the program on behavior. We will share results publicly to inform the broader field.

5. **Incentivize individuals** returning home from incarceration to engage with quality programming that will help their reentry.

6. **Coordinate access to supports**, on behalf of CEO and partners, to help participants secure federal relief funds.

7. **Create long term opportunities to collaborate with government** to address mass incarceration and systems changes needed to support reentry reform efforts.

What was the goal of RCS?

The RCS program was designed quickly, with existing CEO capabilities in mind. See our core design decisions and context below:

A. Cash Transfer - Why Conditional? What Were the Conditions?

Why cash transfers?
Cash transfer programs, specifically conditional cash transfer initiatives, have shown promise in reducing poverty and improving child well-being. These programs theorize that providing direct cash payments leads to financial flexibility, enabling recipients to address their unique needs. Research has shown that conditional cash transfer programs elsewhere in the world have led to less severe poverty, more households lifted above the poverty line, a reduced gap between the rich and poor, increased workforce participation (especially among women), and improved health outcomes among children. By allowing recipients to better meet their most basic needs, cash transfer programs promote more inclusive economic development.

© 2022 Center for Employment Opportunities | RCS Guide

What were the conditions?
CEO's program model was predicated on providing access to immediate, paid transitional work. COVID-19 severely constrained CEO's ability to offer transitional work, and we recognized how participants and other returning citizens struggled to generate income during this critical time. The RCS program attempted to replace lost income from participants being unable to work and applied the program concepts of simultaneous income and job support. CEO worked with partner service providers to develop client goals that would encourage deep program engagement but were also easy to achieve. **These goals (milestones) had the following rough criteria**:

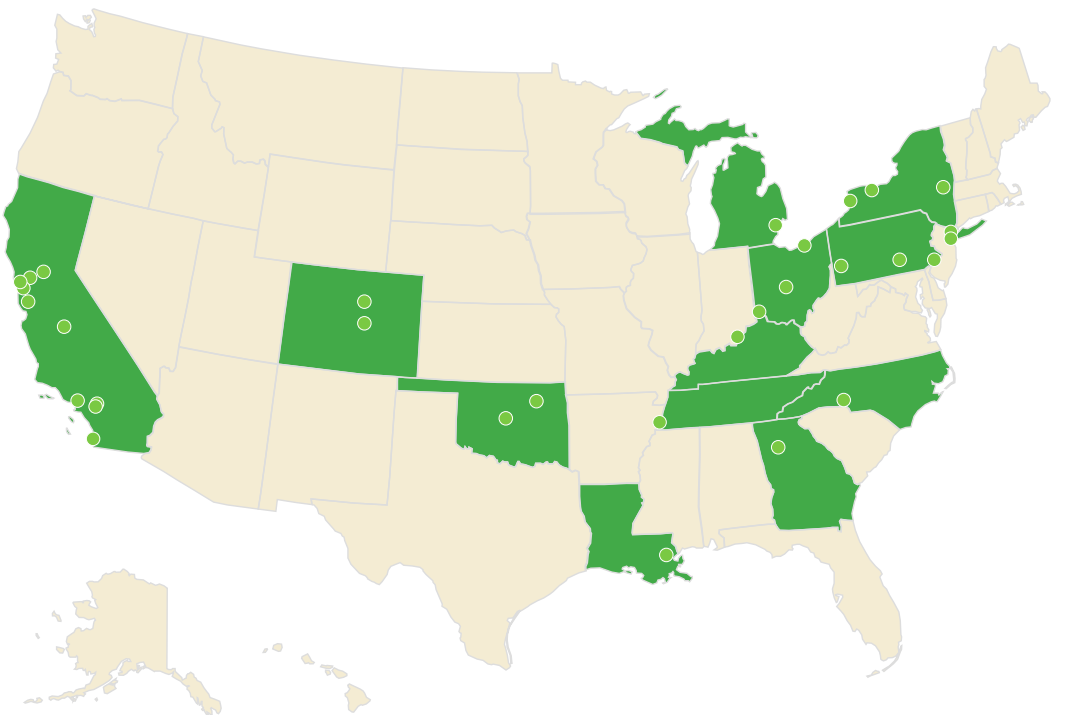
1. Achievable in the program's given timeframe (one every 30 days)
2. Demonstrate active engagement in program (e.g. they should have had interaction with the partner to complete the activity)
3. Linked to job search or employment activities (e.g. make a resume)
4. Realistically achievable within the constraints of COVID-19 (e.g. virtual)

B. City Selection

While CEO participants across 28 cities were eligible for the RCS program, the ability to provide funds to returning citizens outside of CEO hinged on choosing high-impact areas and then targeting partners who served those returning to those areas.

The following criteria were used to select the 7 target cities for the RCS Program:

1. Hardest hit by COVID-19 (in March 2020)
2. Largest racial disparities in COVID-19 hospitalizations and deaths
3. Significant number of people returning from incarceration during COVID-19



© 2022 Center for Employment Opportunities | RCS Guide

RCS Target Populations and Target Enrollments

Target Population
The target population for the RCS Program were adults returning from prison and jail from January 2020 onwards. The target population was also focused on being representative of the incarcerated population. Specific efforts were put into partnering with other organizations who served a diverse array of participants.

Target Enrollments
Target enrollment groups: 1. CEO participants and 2. participants from partner programs.

1. **CEO Enrollments:** All 28 locations were eligible for enrollment into the RCS with a total of 1,375 participant enrollments. Enrollments roughly mirrored the number of participants that CEO would have anticipated to work on transitional job crews during this timeframe.

2. **Partner Enrollments**: Partners' target enrollments were based on a high-level analysis that estimated the number of individuals returning home from prison and jail who may come into contact with local service providers during the pandemic. We based the analysis on state data, news reports on jail releases, and initial communication with other providers. These estimates accounted for both a higher than average number of people coming home due to an increase in COVID-driven releases and the fact that not everyone coming home could connect with a provider. Based on this analysis, we determined a partner enrollment goal of 7,500 individuals across all target communities.

Determining Payment Amounts

We based the first payment estimates on the average earning of a CEO participant through transitional employment in a given pre-COVID month. Once we decided to expand the RCS program to partners, we adapted the calculation to reflect what someone in entry level work would earn in a month. We also incorporated a cost of living adjustment. Depending on their location, participants received a monthly stipend of $900 or $1,100 for the first two months, with a 50% reduction in the third month.

One major consideration was making sure that RCS payments would not put recipients over an income requirement that would remove other benefits (e.g., SNAP). This is a key nuance in determining the stipend amount. The tables below depict what was established as the standard payment for RCS recipients based on the city and type (CEO or partner).

Schedule - Per Participant Payments

	Month 1	Month 2	Month 3	Total
CEO Participants	$1100	$1100	$550	$2640
Tier 1 (NYC, LA, Oakland)	$1100	$1100	$550	$2640
Tier 2 (Tulsa, Detroit, New	$900	$900	$450	$2160

Partner Selection

Once we determined target cities, CEO staff began to identify partners in each location. The invite-only partner selection process focused on the following steps:

© 2022 Center for Employment Opportunities | RCS Guide

1. **Identification of Potential Partners:** CEO national and program leadership led the partner selection process. It was focused on identifying a diverse group of potential partners who served reentry populations. This meant reaching out to small, medium, and large organizations that were reentry-specific or focused part of their programming on reentry. CEO employees in the cities selected, funders, and others provided input into this step.

2. **Partner Input:** After a potential partner was identified, the CEO team sent them a Google form to colect information; including partner milestones. About 60 potential partners completed the form.

3. **Partner Outreach:** Upon receiving a completed form, a CEO employee reached out to a contact at the peer organization to discuss the RCS program concept, the benefits to the partner (administrative fee and support for their participants), and the logistics. This conversation also covered the types of people the partner served to determine if they fit the RCS program. This conversation determined if the partner moved onto developing an agreement or if the RCS program was not the right fit.

4. **Partnership Agreement Contract and Enrollment Targets:** Once the partner agreed to participate in the RCS, we formalized a signed contract and set the partner-specific enrollment target and milestones. 28 partners made it to this stage in the first phase.

Payment Method Selection (Paycards and 1099)

One of the major decisions in the RCS program design centered around leveraging CEO's payment infrastructure to reach partner clients. How would recipients of RCS payments gain access to their funds? What was the proper legal mechanism through which to disburse payments? How could these funds impact tax returns?

The Tax Method Decision
For CEO participants, all of whom are considered CEO employees, this was easy, as we could use their existing W-2 tax forms and I-9s. For them, this would just be more money to be reported at the end of the year (similar to a bonus).

For partner RCS recipients, it was a little trickier. We quickly determined that W-2 was not an option, since those receiving the RCS payment from partners would not be CEO employees. We researched tax rules and accounting practices, with guidance from CEO's General Counsel, and determined that a 1099 arrangement was the best path forward. This decision dictated what the participant enrollment process would look like in terms of requirements for tax-related paperwork and meant that, for partners, the existing paycard product was not an option.

The Payment Infrastructure Decision
For CEO RCS recipients this was an easy decision, there was already a payment structure in place (NetSpend Skylight paycards) and they were already in the participant's possession. The RCS payments would go onto the same card as their income from transitional work.

For partner RCS recipients the decision was not as easy. CEO's existing type of paycard would not work because the partner recipients were not employed by CEO, and we could not expect

© 2022 Center for Employment Opportunities | RCS Guide

each partner to set up an account with payment cards. Writing checks was not a valid option for the program scale, both from a logistics and security standpoint. Ultimately, CEO worked out an option with NetSpend to use another paycard product that linked to a 1099 instead of a W-2, which created the legal relationship to facilitate the transfers without the hurdles of I-9 compliance that come with being a W-2 employee. This then dictated the paycard form and requirements of the participant enrollment process.

Risk and Quality Assurance Design

The RCS program risk and quality assurance design was built around two questions:

1. **How can we be confident that the money is being awarded to individuals that fit the criteria and need it?**

2. **How can we be confident that the individual is accessing the money that was in the agreement between CEO and the partner?**

For the first question, the key was establishing RCS recipients' identities. This meant collecting data that included Social Security Numbers, birthdates, and residential addresses. This also meant being mindful of and protecting personally identifiable information (PII) as it was transferred from the partner to CEO. CEO's Quality Assurance (QA) and Technical team worked together to identify a HIPAA compliant platform to ensure information safety. CEO required partners to inspect and copy recipients' social security cards and photo IDs to confirm identities. Partners also preserved documents that proved their recent release from incarceration.

For the second question, the QA team created a script for calling participants. They wanted to understand if participants could access their money and, if not, why. For capacity reasons, we separated the teams making calls and verifying participant identities. Two QA team members called participants and asked them to walk through their understanding of the program. The calls focused on the enrollment process and fidelity to the program model across partners. If CEO staff identified issues in program implementation (i.e. participants not receiving their paycards upon enrollment), they reached out to the partner to monitor the process.The next step in the quality assurance process was conducting early audits. If there were problems, the team wanted to catch them early.

The Quality Assurance team triggered early audits based on partners' first intake of recipients into the RCS program. We aimed to conduct an audit before the partner received their administrative payment of approximately $25K. The audit triggered re-training or, if malfeasance was suspected, deeper audits. The goal was to audit everyone in that first period, focusing on asking for proof of release of incarceration.

© 2022 Center for Employment Opportunities | RCS Guide

	Risk Area	Mitigation
Partner Oversight	**Partner Selection**	Only partners that serve returning citizens and have a solid reputation in the community were invited to be part of the program; each partner signs a comprehensive agreement with CEO; retains direct relationship with and responsibility for its clients and achievement of milestones
	Separation of Duties	Staff that reviews participant eligibility do not assign the pay card.
	Access to Pay Card	Physical, unloaded pay cards secured using dual control access with tracking
	Audit & Record Review	All enrollments verified for eligibility by CEO. Milestones subject to spot audit.
Risk Management	**Secure transmission**	PII is shared by partners through a secure electronic form that is HIPPA compliant
	Distribution of Pay Cards to Partners	Coordinated and controlled process for distributing paycards to partners; Payment does not go to partners but directly to the recipient
	Paycard KYC protections	Netspend conducts routine Know Your Customer (KYC) checks on all enrollments to ensure that SS numbers and other PII match financial US govt databases
	Loading Pay Cards	Two- part check; CEO verification team completes a cross-check of recipient names and SSNs. Finance flags any time a duplicate SSN is submitted for payment
	CEO Internal Controls	CEO teams that verify, pay, and confirm participants and payments are separated
Privacy	**Privacy laws**	Partner/CEO comply w/ privacy laws as applicable incl. distribution of privacy notice
	Data Storage	All PII will be held in CEO's CRM system with limited access.

Database Design

The RCS program design relied on large amounts of sensitive data being transferred between partners and CEO to facilitate payments to their participants. **For the RCS pilot, we used CEO's existing Salesforce system coupled with quick and fast tools like Google forms.**

The main considerations were time to develop, capabilities, security, and the ability to repeat in potential iterations in the future. We decided to use CEO's existing robust Salesforce architecture because, even though the upfront build out would be harder, the long-term capabilities were much more useful (e.g., linked to CEO's existing payments system). This decision meant:

1. The existing Salesforce team, including CEO employees and consultants, had to be fully devoted to the build of this system for 8 weeks.

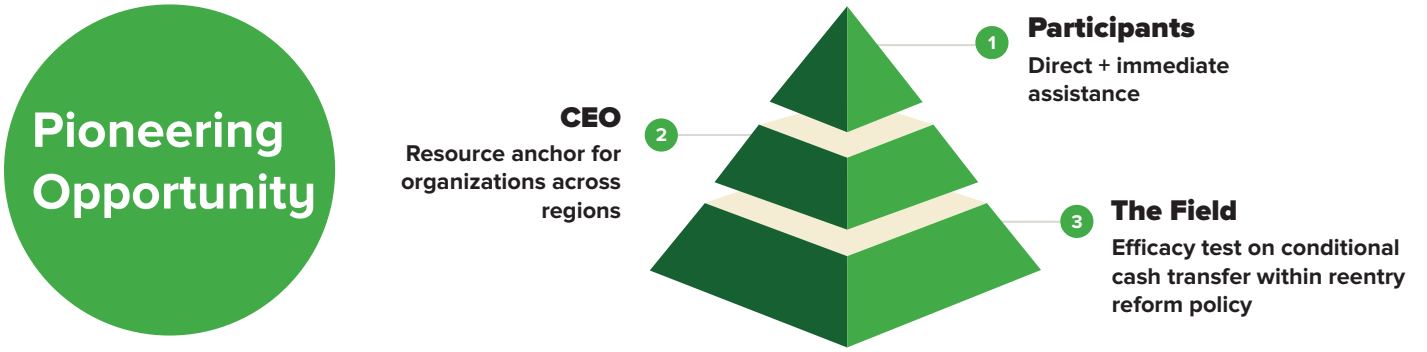
2. We built a database within our Salesforce structure so that RCS would be separate from CEO's core programming data. This supported enhanced data security and cleanliness.

The next decision was on what tool to use to securely transfer data from partner organizations to CEO. There were two camps on how to do this. One wanted Google forms and the other wanted to use Form Assembly. We ran both options simultaneously leading up to the go-live date. Form Assembly eventually was determined to be the optimal choice. Form Assembly is a tool with broader application outside of RCS and can directly transfer information from partners into Salesforce. Form Assembly eliminated the need to manually transfer the data.

CEO has contracted with research firm MDRC to complete a third-party evaluation of the RCS program.

© 2022 Center for Employment Opportunities | RCS Guide

Where does the evaluation focus?
The evaluation focuses on deepening the knowledge on cash transfers and reentry. It will add to the knowledge base on both conditional cash transfers and reentry. The evaluation will document how the RCS program operates and assess how it affects participants, providers, and the criminal justice system. **The evaluation seeks to address the following broad questions:**



The evaluation seeks to address the following broad questions:

1. **Economic Mobility & Employment:** Does RCS affect participants' ability to obtain and retain employment?

2. **Financial Stability:** How does the program affect beneficiaries' stability and living conditions in the immediate and short term?

3. **Access to Benefits & Relief Payments:** What other income or benefits do participants access (EITC, EIP, SNAP)? How did RCS or program services influence their access to benefits? How and when do they file taxes and how does that affect their income?

4. **Income & Spending Patterns:** How do RCS transfers fit with other sources of household income? How do participants spend these dollars?

5. **Physical & Mental Health:** What can we learn about our population in the specific context of a global pandemic?

6. **Public Safety & Incarceration:** Will RCS affect beneficiaries' interactions with the criminal legal system (police, courts, prison, parole)?

7. **Effect of Program Requirements on Outcomes:** Two of the three cash transfers will have limited conditions, or behavioral requirements, to issue payment. Is completion of any of the conditions correlated with improved outcomes? Do we see changes in engagement with other intermediate outcomes, such as working a transitional job?

8. **Policy & Practice Changes:** How will key systems - probation and parole in particular - respond to this practice?

© 2022 Center for Employment Opportunities | RCS Guide

MDRC is examining these questions across subgroups of participants defined by gender, race, age, or other key variables.

Research Topic	Key Outcome	Description	Data Sources
Financial Stability	Access to housing and other necessities	Percent of RCS beneficiaries who report being in stable living situation	• Web-based surveys • CEO's MIS; Program data from partners' if available
Financial Stability, Economic Mobility, and Employment	RCS Payment Spending Patterns	Percent of RCS beneficiaries who report using cash transfers to pay for housing, utilities, groceries, court fines and fees, transportation, healthcare, childcare/support, etc.	• Web-based surveys • Participant Interviews
Economic Mobility and Employment	Employment training and reentry supports received as part of RCS program milestone requirements	Participation in RCS program requirements	• CEO's MI; milestone tracking information from partner organizations
Economic Mobility and Employment	RCS beneficiaries' experiences and behaviors	Perception of how RCS beneficiaries respond to RCS stipends	• Interviews with participants, program staff, and probation / parole officers
Personal and Family Well-Being	Participant and other household members' general well-being	Perceived challenges or barriers to healthcare access, access to healthcare or treatment	• Participant Interviews
Justice Involvement	Parole violations and revocations	Percent admitted to jail for a technical violation	• Local criminal justice data from 1-2 target states (LA, Detroit, New Orleans, and potentially NYC)
RCS Perceptions	Context	Perception and views of RCS program	• Interviews with participants, program staff, and probation / parole officers
COVID-19 Changes to Standard Parole Practices	Parole context	Changes to usual supervision practices changed in response to COVID and their perceptions of those changes	• Interviews with probation/parole officers

Evaluation Design

Given the context of RCS's implementation, the evaluation cannot employ a randomized control trial or other rigorous quasi-experimental design. Rather, the evaluation employs ethnographic methods to learn from participants, staff, and system actors. In 1-2 sites, it may be possible to use administrative records to identify a rough comparison group and to explore whether RCS affects outcomes like arrest, parole violations and, in the longer term, employment and mobility.

The evaluation is divided into 3 phases:

- **Phase 1** uses surveys, program data, and in-depth interviews to assess outcomes over a period of approximately 5 months after each participant's enrollment in the program. There is an additional optional component in phase 1 which would assess the impact of linking RCS payment to specific activities compared with receipt of RCS payment with no link between achieving a specific program activity (e.g. A vs. B test).

- **Phase 2** uses criminal justice (CJ) system records in a subset of sites to explore outcomes over 6-12 months after enrollment (this requires an additional 6 months for study completion). In those sites where it is possible to obtain CJ system records, we would also explore the possibility of creating a non-experimental comparison group to assess CJ outcomes for RCS recipients relative to a comparison group of individuals released around the same time who did not access the RCS.

- **Phase 3** includes a longer-term follow-up using additional administrative records, including quarterly earnings data and is dependent on access to government databases.

© 2022 Center for Employment Opportunities | RCS Guide

Data Sources

At the point of enrollment, RCS participants were asked to sign an Informed Consent form that allows the evaluation team to collect the following data:

- **Baseline data of recipients:** Demographic characteristics and contact information to facilitate the surveys and identifiers to facilitate the collection of administrative records.
- **Web surveys:** Two 10-minute surveys, one at the point of the second RCS payment (approximately 1 month after enrollment) and the second about two months after the final payment (5 months after enrollment). These surveys, accessed via links included in text messages, focus on measures of economic stability, health, employment, well-being, and system involvement. Participants receive a small incentive for completing the second survey. The first wave was targeted to the entire sample while the second wave is targeted to a sub-sample.
- **In-depth phone interviews:** The evaluation team conducts 30-minute phone interviews with roughly 30 participants in 3 cities at around the time of the second web survey. These participants are selected intentionally to represent key target groups. These conversations aim to gain insights about recipients' experiences and perceptions of the RCS and how it affected their lives since release. If possible, the evaluation team will conduct interviews with probation or parole officials in these communities to understand if and how RCS affected participants' interaction with the criminal justice system.
- **Payment and service use data:** Data collected from CEO's HMIS and payroll systems and measures key outcomes about relief payment receipt, service receipt, and dosage. It may be possible to benchmark these outcomes against rates for previous cohorts. In addition, the MIS would be used to assign individuals to an A vs. B condition where the impact of linking conditions to payments compared with different/no conditions affects outcomes. CEO will assist in the collection of service use data from partners.
- **Criminal justice system records:** MDRC is seeking criminal justice system records in Calif. Analysis of criminal justice outcomes would require an additional 6 months to complete.
- The informed consent form will allow MDRC to collect other data, including unemployment insurance records, as part of a longer-term follow-up study.

Ethical Evaluation & Informed Consent

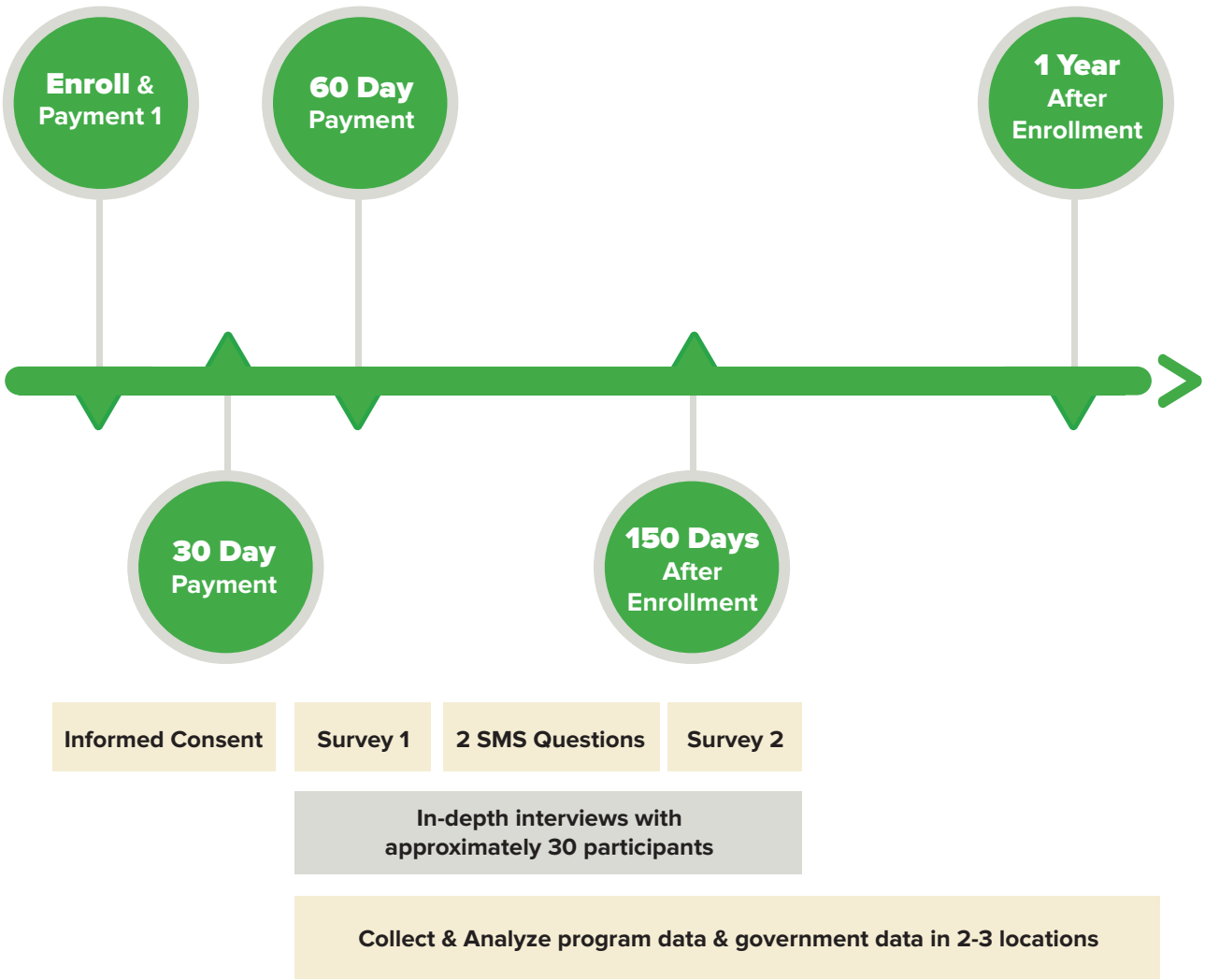
CEO and MDRC worked together to design and implement safeguards and ethical evaluation practices. This is especially important in this evaluation because of a history of unethical research practice, especially towards Black communities and incarcerated people. MDRC has an Institutional Review Board tasked with reviewing and approving every research project to ensure subjects are treated ethically and are not manipulated into behaviors by the researchers. Every RCS participant had the opportunity to opt into or out of the evaluation and were provided with an informed consent form describing the project, their participation, and the data MDRC would collect. Participation in the evaluation did not affect participants' eligibility to receive RCS funds and there were no negative consequences for declining to participate in the evaluation.

Implementation Study

In addition to these participant-focused data sources, and as part of phase 1, the evaluation team conducted phone/video interviews (either individual or in small groups) with CEO staff, partner agency staff, and parole agency staff. The team conducted at least some interviews in all six sites, but there will likely be a heavier focus on the 2-3 sites with the largest number of participants. The budget assumes that most staff and partner interviews will be conducted by phone, with the exception of NYC and LA or Oakland where MDRC staff are local. Qualitative data from staff and partner interviews will be supplemented with data from CEO's MIS.

© 2022 Center for Employment Opportunities | RCS Guide

Evaluation Timeline
See the following diagram that depicts our evaluation timeline:



© 2022 Center for Employment Opportunities | RCS Guide

Original Team Structure Design

Design and implementation of the RCS program required a huge level of effort across CEO staff. COVID created excess capacity due to some employees not being able to perform their normal roles. If COVID had not stopped some of CEO's normal work, implementing RCS would have required a full buildout of new hires. With that in mind, this section is meant to give a perspective of the team design it took to pull off the RCS program.

1. **Program Design Team** - This team was in charge of the initial concept of RCS, writing the proposals, and the policy work behind RCS. This team included:
    A. President
    B. Chief Strategy Officer
    C. Director of Policy
    D. General Counsel
    E. Chief Financial Officer
    F. Other senior team leadership.

2. **Technical Team** - This team was in charge of making the RCS concept a reality and translating the requirements of payments to outside of CEO individuals into action. This team was full time for about 8 weeks during the design of the systems. Then they remained in support roles for the program, but not to the same degree:
    A. Director of Payroll
    B. Manager of Strategic Operations
    C. Salesforce Administrator
    D. Chief Information Officer
    E. External Salesforce consulting team

3. **Partnership Team** - This team was in charge of finding partners, reaching out, getting contracts signed, and onboarding partners (providing trainings and on-going support).
    A. Director of Economic Opportunity
    B. Director of Strategic Partnerships
    C. Partner Liaisons (program staff redeployed to this team)

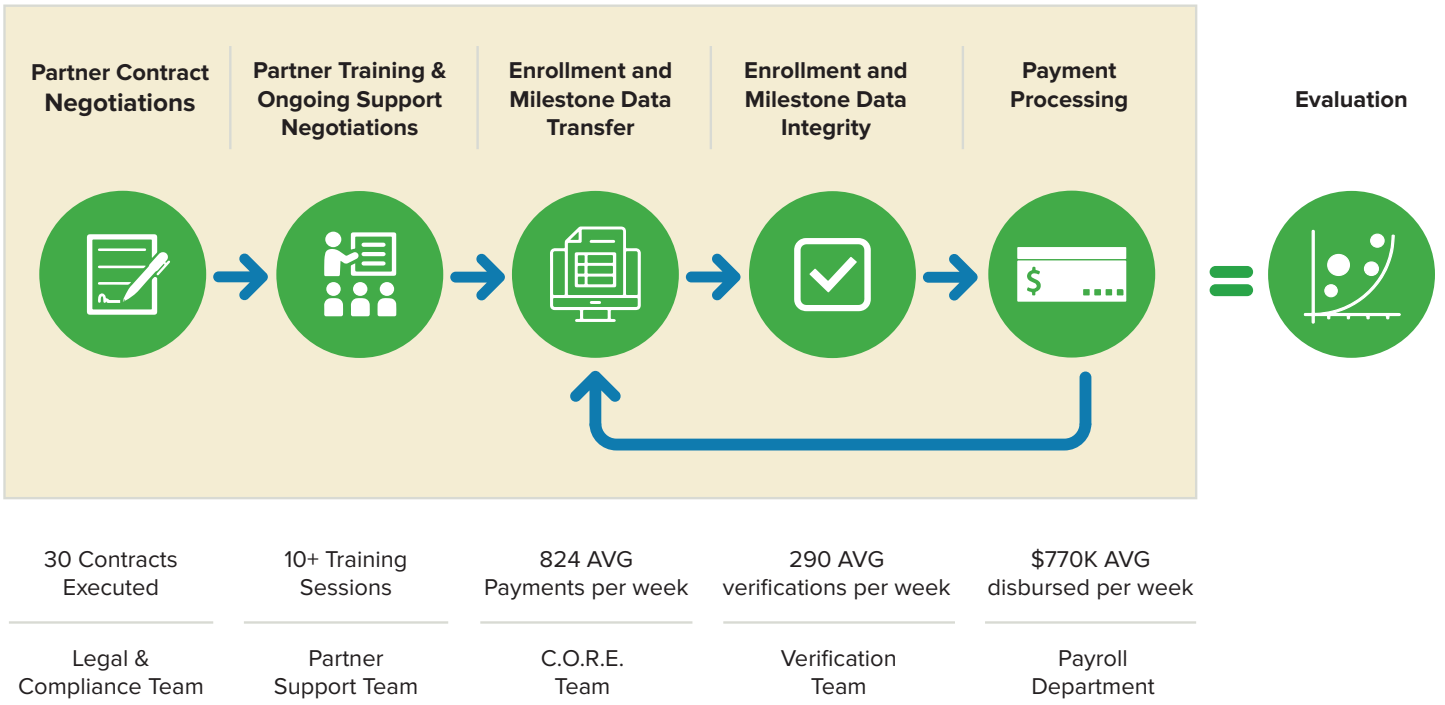
4. **Quality Assurance Team (Audits and Verifications)**
    A. Director of Quality Assurance
    B. Quality insurance leads (program staff redeployed to conduct partner audits, verifications, etc)

© 2022 Center for Employment Opportunities | RCS Guide

5. **Evaluation Team**
    A. Director of Program Innovation
    B. Director of Learning and Impact
    C. MDRC (external consultant)

Plan for Implementation of the Program

See the following diagram that depicts our implementation plan/process:



Policy Considerations for RCS Moving Forward

CEO was able to leverage RCS to enact meaningful policy change in a number of states. The availability of cash assistance was used as a direct point of advocacy with executive leadership in both New York and California and contributed to the release of thousands more people in each state. In California, RCS was part of the Returning Home Well initiative which launched in July 2020 and helped thousands more individuals who were released from prison early during the pandemic access enhanced reentry services when they returned home. Additionally, philanthropic partners in Michigan worked with CEO to demonstrate how immediate financial support served as a lifeline to individuals coming home from incarceration, and the state should do the same; specifically, by implementing SNAP reform to eliminate the ban that prevented individuals who had multiple felony drug convictions from accessing food assistance for life. This reform was implemented in October 2020 thanks to this advocacy.

© 2022 Center for Employment Opportunities | RCS Guide

Additionally, CEO sees the implementation of RCS and lessons learned as key elements of our policy agenda noted below:

Immediate to Medium Term
In the immediate to medium term CEO focused its policy efforts on getting and keeping people out of incarceration and ensuring they have access to the support they need upon release. In all RCS states, CEO actively works and collaborates with others to engage governors around reducing the number of people incarcerated and supporting existing reentry programming.

Decarceration: CEO advocates for governors and county jail officials to release more people from their institutions and for parole and probation authorities to stop re-incarcerating people for technical violations of their supervision. The pandemic showed that more people could be released from prison without a negative impact on public safety, and that crowding in prisons could literally cause a public health crisis. These efforts focus on people who never should have been incarcerated in the first place, namely people incarcerated in jails for inability to pay bail, people incarcerated on technical violations, people incarcerated for non-violent offenses, and people incarcerated for unnecessarily lengthy periods. CEO's efforts focus on advocating for governors to release people from prisons through executive orders or by simply streamlining the release process. CEO works with departments of correction (DOCs) and probation offices to advocate for eliminating any return to incarceration for a technical violation. Demonstrating success would be an important proof point that allows future legislative efforts to feel confident they can decarcerate more aggressively without harming public safety.

Sustain and Expand Effective Reentry Support: CEO advocates to state and local officials that, at a minimum, they sustain the existing capacity of their reentry programs and invest in these organizations to expand capacity as resources become available. With state budgets drastically reduced in FY21 (even though revenues in many states were not negatively impacted by the pandemic), sustaining existing capacity in the community is critical. CEO participants and other justice-involved individuals, many of whom have been essential workers throughout the pandemic, rely on programs like CEO that support them and their families during the pandemic, economic recovery, and beyond. More government investment is needed to expand access to jobs for these individuals, particularly those that create an immediate on-ramp to employment.

Release Coordination: CEO advocates to governors and DOCs, as well as their local jail counterparts, to improve release planning and coordination. In California, we implemented this as part of RCS: philanthropies and nonprofits partnered with the State and Governor Gavin Newsom to implement "Returning Home Well," a public-private partnership that provides essential services — like housing, health care, treatment, transportation, cash assistance, and employment support — for Californians returning home from prison after July 1, 2020.

© 2022 Center for Employment Opportunities | RCS Guide

Investing in Employment and Training Support: CEO is currently advocating members of Congress to make targeted investments in employment services for people coming home from prison through the Workforce Innovation and Opportunity Act (WIOA) and infrastructure investment package, including a recommendation for a $800M investment in transitional jobs. Federal stimulus funds can reach thousands of individuals across the country who would otherwise be impoverished upon returning home from prison. Through incentivized engagement with employment programs, these individuals will be able to access employment services that will help immediately train, certify, and upskill them to improve their long-term employment prospects. Through programs like CEO, participants can gain access to transitional jobs in industries compatible with their skills and needs, giving them immediate work experience. This program will enable returning citizens to access immediate economic security and to embark on a path to long-term economic mobility.

Medium to Long Term

Increase Access to Benefits: CEO advocates for state and local officials to reduce and eliminate any barriers that may prevent people from enrolling or sustaining access to public benefits. At the federal level, CEO urges members of Congress to expand eligibility and access to all safety net programs. In the states and local jurisdictions, CEO works with officials to eliminate barriers to accessing and sustaining enrollment in public benefits. For example, CEO advocated for Michigan to end its ban on access to the
Supplemental Nutrition Assistance Program (SNAP) for individuals with two or more drug convictions. States should work with federal officials to reduce barriers and expand eligibility for public benefits like SNAP, Temporary Assistance to Needy Families (TANF), Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), Medicaid, and emergency housing and tools made available by federal stimulus packages, to ensure that individuals can access immediate resources.

Reducing Criminal Justice Debt - In states and counties that have yet to suspend the collection of justice-related fines and fees, CEO urges governors to take executive action. CEO advocates for states to reduce fines and fees moving forward, since COVID-19's economic impact will outlast the duration of stay-at-home orders. The RCS program can demonstrate how immediate income upon release from prison can improve an individual's ability to successfully reenter society and stay out of the criminal justice system.

Testing Use of Vouchers - Studying the economic and public safety effects of this stimulus can demonstrate the impact that immediate income can have for people coming home from prison. Giving people in the criminal justice system access to cash and agency to determine how they should spend it is a necessary response in this COVID crisis, yet it is somewhat unprecedented for the justice system. If we can demonstrate that this stimulus has a positive economic and public safety benefit, it could be transformative for criminal justice policymakers.

© 2022 Center for Employment Opportunities | RCS Guide

Facilitating Economic Mobility - The long-term imperative of this stimulus should be moving every person from prison to a place where they can achieve real economic mobility. This can help participants develop pathways out of poverty through increased access to hard skills training and financial empowerment services. At CEO, this work has three prongs: financial coaching sessions that are incorporated throughout our program, short term training that participants can engage in such as OSHA 10, forklift training and longer-term career pathways training and apprenticeship programs, which we help our participants access and also look to stipend as well. This stimulus program gives CEO and other providers an opportunity to expand this work and broaden its impact to more returning citizens throughout the country.

RCS Partner Implementation and Lessons Learned

Onboarding Partners

Implementation of the RCS program required strong collaboration between CEO and partner service providers. In addition to standardized onboarding and training, which addressed some of these key lessons learned, we matched each RCS partner with a CEO staff member (RCS Liaison) to act as an on-the-ground, real-time advocate for any issues with the enrollment or payment process. There were a few crucial lessons learned from onboarding partners:

1. **Partner organizations may not be as familiar with technology as CEO employees.** Many required extra support on the enrollment process, collecting participant identification information, technology systems, and paperwork completion process.

2. **Dedicating extra training time to paycard systems and distribution.** Some partners withheld paycards while recipients were in residential treatment. We rectified these issues through audits and calls.

3. **Improving understanding of how milestones linked to payments and the significance of follow-up paper work.** Partners sometimes struggled with submitting milestone progress information, which would delay funds being transferred to participants. We added this to the training but could have better integrated it into the original onboarding process.

4. **Managing partner expectations.** If partners did not submit milestone confirmation on time or after a certain grace period,their participants were at risk for missing payments.. Also, some partner staff were not aware their organization had a maximum number of individuals they could enroll.

Enrolling Participants in the RCS Program

The following were key tools utilized to facilitate partner client RCS enrollments.

1. The partners needed to collect accurate data from enrollees, verify identity, verify release, and have the participant fill out four forms:
    A. RCS Evaluation- Informed Consent
    B. RCS W9
    C. Netspend 1099-card Pay Election Form
    D. RCS - Paycard Authorization and Consent

© 2022 Center for Employment Opportunities | RCS Guide

2. CEO's Quality Assurance team verified enrollments by checking that:
    A. The participant agreed to informed consent on the MDRC evaluation form. If not, the status of their consent needed to be confirmed "no" in Salesforce.
    B. All mandatory inputs were completed across forms.
    C. The SSN across the forms and Salesforce matched.
    D. The address across forms matched.
    E. The Skylight paycard number was on the form.
    F. There were no duplicate records in Salesforce of the participant name.

3. Pending paperwork issues, the CEO team contacted the partner via Salesforce with the participant's unique link, indicating what they needed to fix before approval.

4. After obtaining accurate data across the forms and Salesforce, the participant was approved, enrolled, and paid.

The enrollment and verification process was time consuming and had many lessons learned:

1. **A small dedicated team is better than a larger spread out team for verification.** We developed the RCS Partner Org Training so that many people could learn how to verify participant enrollments. Through this process, we distilled that, *instead of a number of part-time users, four full-time staff would have been more accurate and efficient.*
2. **A longer lead time is needed for enrollment verification.** The RCS 1.0 designated a verification window of 24 hours after a partner uploaded participant data. This was not a feasible timeline, as partners entered participants in batches, at peak enrolling hundreds of participants per day. For RCS 2.0, we expanded the timeline to a week.
3. **Initial enrollment error rates were high, but reduced over time.** Gradually, partners built familiarity with enrollment forms and we adapted training to cover common errors.
4. **Salesforce duplicates added a step to the process.** We could not devote resources to fixing the client duplication issue in the initial RCS. In the long-term, we aim to rectify the issue.

Payment of Participants and Milestones

Participant payments - CEO already has a system to process daily payroll for participants working on its transitional jobs crews. The payroll department had to determine if that system could handle an increase in volume. After distributing payments, CEO worked with Skylight to monitor paycard activity. As a security feature, Skylight issued holds on accounts that did not show activity or lacked documentation. This presented a two-fold challenge. First, some participants intentionally left money untouched as savings. Second, the Skylight holds imposed a deadline to address the issue. This was particularly challenging in a pandemic, as participants struggled to obtain necessary documents (such as Social Security cards or state identification cards). During that hold, CEO could not deposit money and participants could not withdraw funds. If the issue was not corrected, Skylight closed the account. CEO is working with Skylight to allow for more flexibility. Previously noted enrollment errors and taxation implications also created delays in the payment process.

Milestones - For a participant to be eligible for all three payments, they must complete relevant milestones at the 30/60/90 day marks. In many cases, partners were responsible for tracking and recording participant milestones. Some partners struggled to select benchmarks or did not convey requirements to the participants in a timely manner. In response, participants had to complete milestones after the deadlines or scramble to complete them in time. Early in the RCS implementation, CEO addressed this challenge in partner training. In the beginning of the RCS program, we utilized a grace period for milestones, to avoid penalizing participants.

© 2022 Center for Employment Opportunities | RCS Guide

Evaluation in Practice

MDRC began conducting evaluation activities in July 2020, issuing web surveys to recipients in Los Angeles, Oakland, New Orleans and Detroit. Recipients received text messages with a link to the survey which was housed on Qualtrics, a cloud-based tool used by MDRC. Respondents could receive a small cash incentive, delivered via email, for completing the survey. MDRC's practice with implementing the survey changed modestly over time to increase response rates and improve data quality. A few key changes included: confirming email addresses to-facilitate the cash incentive transfer; sharing survey information with partner organizations to facilitate feedback; and updating participant mobile numbers in Salesforce to centralize accurate data.

MDRC initiated interviews with partner staff, RCS recipients, and community corrections officers in Summer 2020 (still ongoing). MDRC and CEO also partnered to establish research agreements with government agencies, seeking access to administrative data. At the time of writing this manual, those discussions are ongoing in California and Louisiana.

Actual Performance

The initial enrollment target for partner RCS recipients was 7,469 and $19.2M in direct payments. The initial enrollment target for CEO participants was 1,375 people and $3.7M in direct payments. We monitored real time performance using the Salesforce dashboards. **The actual performance as of December, 2021 is the following**:

Organization	Enrollments
CEO	1928
Amity Foundation	918
Los Angeles County - Workforce Development, Aging and Community Services	650
Los Angeles Regional Reentry Partnership (LARRP)	623
A New Way of Life Reentry Project	590
Building Opportunities for Self-Sufficiency	479
The Fortune Society	398
The Osborne Association	396
Turning Point Alcohol and Drug Education Program, Inc	392
Starting Over, Inc.	306
Operation Restoration NOLA	303
Whole systems learning	286
Goodwill Industries-Detroit	278
The First 72+	274

© 2022 Center for Employment Opportunities | RCS Guide

Organization	Enrollments
Anti-Recidivism Coalition	249
Second Chance Center	246
Five Keys Schools and Programs	240
DLIVE	199
Resonance Center for Women	184
Abode Services	149
Roots Community Health Center	141
The Don't Look Back Center	132
Health Management Systems of America	119
The Empowerment Program	116
Lao Family Community Development, Inc.	108
Urban League	105
Center for Community Alternatives	95
Detroit Justice Center	92
Total Community Action	91
Exodus Transitional Community	86
Family & Children's Services Women's Justice Team	77
Servicios de la Raza	77
Center for Alternative Sentencing & Employment Services (CASES)	54
WestCare DRC	21
Other	6
TOTAL	**10,408**

© 2022 Center for Employment Opportunities | RCS Guide

Core Re-Designed Elements and Rationale for Changes

- **Focusing the role of RCS in decarceration.** For the newest iteration of RCS, CEO has partnered with CA-based advocacy organization For The People (FTP). FTP is a pioneer of "prosecutor-initiated resentencing," a practice that allows state attorneys the authority to petition criminal courts for early release of incarcerated people with excessive sentences. Any individual released as a result of FTP's advocacy is automatically eligible for RCS payments. The partnership gives FTP a convincing resource to highlight when advocating for an individual's release.

- **Remote enrollment flexibility.** Since the initial RCS launch, CEO created guidelines to help partner staff facilitate enrollments partially or entirely online. At project start, partners were required to meet in-person with recipients to complete paperwork and distribute paycards. Partners now have flexibility to facilitate enrollments in-person, remotely, or a blend of the two.

- **Dedicated customer service.** CEO honed its ground-level partner support approach over the course of the project's first several months. After an initial period with a larger support team with varied responsibilities, CEO created a smaller, dedicated customer service team to serve as consistent points of contacts for partners.

© 2022 Center for Employment Opportunities | RCS Guide