



July 19th, 2023

Board of State and Community Corrections
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Dear Kathleen Howard, Colleen Curtin, and Chair Penner,

The undersigned community-based organizations write to you to raise serious issues with the BSCC's grant reporting requirements and disbursement process. Specifically, organizations across the state are facing significant barriers in receiving ARG re-entry funding we've been promised by the agency. As a result, CBOs are spending an outsized amount of time and resources trying to meet unreasonable and unclear reporting standards set by often non-responsive BSCC staff.

Grant disbursement is one of the BSCC's major responsibilities. When the agency fails to uphold its commitments to working with community-based organizations implementing re-entry programming on the ground, it both hinders our ability to provide services to target populations and causes organizations like ours to lose trust in the intentions and efficacy of the BSCC.

A New Way of Life promotes healing, power, and opportunity for formerly incarcerated people in Los Angeles County by taking a multifaceted approach to mitigating the effects of, and ultimately eliminating, mass incarceration. One year into ANWOL's 3-year contract with the BSCC for re-entry services, the organization was forced to end the partnership due to cumbersome reporting requirements and non-responsive BSCC staff. While the organization's first and second invoices were approved, the following three invoices (periods 3-5) were not approved but nine months passed before staff were informed that there was an issue with the submitted invoices. The organization was asked to go back and describe the methodology for billing in those periods and extensively re-work the invoices, despite not having received any notice that invoices for periods 3-5 needed adjustments for several months. ANWOL ultimately decided that the administrative lift to receive grant funding from the BSCC was too great, and that the organization was no longer benefitting from the partnership.

Barrios Unidos provides culturally-driven and spiritually-informed services to youth and adults within the Santa Cruz region's most marginalized communities. When the accountant on staff at Barrios Unidos passed away unexpectedly in 2021, the organization was running behind on submitting some of its grant reporting documents. Staff communicated this information with the BSCC as they were hiring an accountant to help them catch up on grant reporting. In



September of 2022, a BSCC staff member came to the Barrios Unidos office and reviewed some documents, but never provided a writeup about her visit, or a summary of any issues in need of action or correction. Barrios Unidos should have received a formal written CMVR with a summary of the areas reviewed and compliance status, as outlined in the BSCC-Grant-Admin Guide from July 2020, but never did.¹ Within a few weeks of this visit, the BSCC said they planned to terminate Barrios Unidos' grant at the end of 2022, cutting the organization off from the final three months of anticipated grant funding. There was never an opportunity for Barrios Unidos to correct any issues. When staff attempted to get in touch with the BSCC office to speak with Deputy Director Ricardo Goodridge, none of their several phone calls were returned. Barrios Unidos was never reimbursed for their last several invoices (periods 7-13). Barrios Unidos was supposed to receive \$465,000 from this grant, and only received a total of \$125,000, significantly impacting their operating costs. In addition to being denied the final three months of promised funding, it took long periods of time to receive permission back from BSCC to use funding for things like food for groups held during dinner, gift cards, and bus passes during the grant period.

Starting Over, Inc. provides re-entry housing and transitional housing services in Riverside and Los Angeles Counties. In attempting to secure promised funding from the BSCC, their team has found BSCC staff to be very slow to respond to inquiries, and inconsistent in details about client incentives. They are still waiting to get approval for house guests needs that were requested months ago, including for things like gift cards, transportation costs, hygiene kits, CIDs, SSCs, birth certificates, etc. Starting Over's staff have participants coming to their programs straight from prison with nothing, and yet the organization cannot spend anything to meet their immediate needs without jumping through major hoops. Even when Starting Over has fulfilled the difficult reporting requirements from the BSCC, the agency has repeatedly found fault with the requests and found a reason as to why expenses are not reimbursable. The organization is now on a monthly billing cycle to avoid incurring quarterly expenses before submitting their reports and invoices; however, they have yet to be reimbursed for previous as they prepare to submit for upcoming ones. There has been no approval, and no notice of why the BSCC's process is so delayed. The BSCC continues to tie the organization's hands and withhold funds that fall within the budget. Without these program funds, they are unable to provide the level of support needed for successful reentry. The organization feels the BSCC does not trust them to do the work they have proposed to do, and does not recognize them as the subject matter experts that they are.

Turning Point offers re-entry programming and support services in Los Angeles. The organization has a contract to receive \$468,070 in Warm Handoff Adult Reentry funding from the BSCC to support their programming. However, Turning Point has frequently been forced to

¹ "The [BSCC](#) will provide the CMVR to the Grantee generally 60 to 90 days after completion of the monitoring. If significant findings are identified in the CMVR, the Grantee must submit a Compliance Improvement Plan (CIP) within 30 calendar days of the date of the receipt of the CMVR. CIP instructions and submission information will be provided by BSCC staff."



fund these programs from their own operating costs instead of the grant dollars they had budgeted for, due to the BSCC's extreme delay in sending reimbursements. Despite filing budget modifications after the organization's first and second invoices were approved, the following three invoices (periods 3-5) were not approved. Five months passed before staff were informed that there was an issue with the submitted invoices. The BSCC's team took months to approve adjustments to spend down grant dollars, in order to receive a second payment from the BSCC. This delay left the organization short on anticipated funding and drained their administrative resources on repeated follow-up communications with BSCC grant staff. As of the submission of this letter, Turning Points should be receiving reimbursements for reporting period 6, but the BSCC team is behind by 3 reporting periods and a second budget modification.

This is not the first time issues with grant transparency and accountability have been raised for this Board by CBOs this year. As Bonafide Sisterhood [wrote to the BSCC in February](#), "We were part of a CalVIP grant application under the City of Antioch that was recently awarded in Cohort 4. The name, expertise, and credibility of our organization was named throughout the application, and our role was confirmed in a letter of partnership we signed on behalf of the grant. The City of Antioch's awarded proposal relied heavily on our involvement in it. And yet, since the awarding of the grant, the City of Antioch has informed us that they no longer intend to subcontract with Bonafide Sisterhood." The BSCC's non-response to this major issue has further entrenched the lack of trust between community organizations and the agency.

The intention of warm hand-off funding is to ensure resources are flowing back to communities to support the re-entry efforts led by directly impacted organizations on the ground. The BSCC's failure to be a good-faith partner in the distribution of this funding means that organizations are actually taking on additional administrative burdens to try and receive these resources, rather than being supported and uplifted in the crucial work we are doing. It impacts our ability to provide crucial programming to the communities we are working every day to empower and uplift.

One of strongest remedies for these ongoing issues would be for the BSCC to **return to an earlier grant disbursement model, in which grant payments were divided into equal advance payments by year, and sent out once organizations had spent down 80% of the prior payment.** Providing some of that funding upfront to organizations will prevent us from having to dip into our funds or cut corners elsewhere, because we would have the funds needed to do what we are planning to do. The current total reimbursement model is extremely problematic for smaller organizations trying to meet program and organizational expenses as they wait for approvals and payments. Organizations doing crucial work on the ground are walking away from funding streams intended for them because it may not be worth the bureaucratic trouble if others are willing to fund their work.

We additionally ask that the BSCC conduct an internal audit and review of their Grant Administration processes to address the following issues:



1. **Timeliness of approving budget adjustments and approving reimbursements:** Why is it taking so long for organizations to get funding requests approved and reimbursed?
2. **Stringent reporting requirements:** How can the agency simplify the reporting process to eliminate unnecessary bureaucratic barriers for reporting organizations? What are best practices from other states and foundations on reporting requirements?
3. **Staff correspondence with community partners:** How long is it taking staff to respond to inquiries and support requests from community partners? How can the agency be more responsive to grant recipients to ensure they are receiving their grants in full? How is agency staff engaging with community partners? Is the agency honoring the expertise of CBOs working alongside impacted communities on these issues? If not, what adjustments need to be made?

Sincerely,

Starting Over, Inc.
Turning Point
A New Way of Life
Barrios Unidos
Midtown Family Services
The Faith Advisory Council for Community Transformation