

**Contract Compliance Review of
Goodwill of Southwestern Pennsylvania
Custodial Care Center for
Work Release Services
For the Period April 1, 2007
Through December 31, 2008**

July 13, 2009

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COUNTY OF ALLEGHENY

OFFICE OF THE CONTROLLER

104 COURTHOUSE • 436 GRANT STREET
PITTSBURGH, PA 15219-2498
PHONE (412) 350-4660 • FAX (412) 350-3006

MARK PATRICK FLAHERTY
CONTROLLER

GUY A. TUMOLO
DEPUTY CONTROLLER

May 13, 2009

Mr. Ramon Rustin
Warden
Allegheny County Jail
950 Second Avenue
Pittsburgh, PA 15219

**SUBJECT: Contract Compliance Review of
Goodwill of Southwestern Pennsylvania Custodial Care Center
for the Period April 1, 2007 through December 31, 2008**

Dear Warden Rustin:

We have reviewed the Goodwill of Southwestern Pennsylvania's Custodial Care Center's (Goodwill), formerly known as Goodwill Industries of Pittsburgh, compliance with its contract with the Allegheny County Jail related to alternative housing work release services. We performed this review to ensure that Goodwill was in compliance with the scope and terms of the work related services authorized under the contract. Our review covered the period of April 1, 2007 through December 31, 2008.

Our review identified inaccurate invoices from Goodwill resulting in an amount of \$1,491 to be reimbursed to the Jail. We also noted that Goodwill is not consistently following the Jail's policies and procedures of having the sentencing Judges approve eight hour home passes for residents. Additionally, Goodwill needs to ensure that the resident files have proper documentation to support community service hours completed by the residents while away from the facility and notification regarding the resident's medical and psychological clearance as required for participation in the alternative housing program. Furthermore, Goodwill should develop procedures to ensure that a resident's progress in the alternative housing program is properly documented and tracked to ensure that residents are entitled to the privileges awarded for positive program progression.

Warden Rustin
May 13, 2009

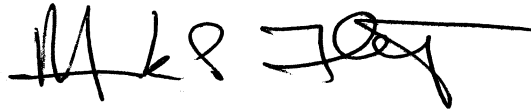
We believe that the implementation of our recommendations will improve Goodwill's program monitoring as well as the overall operation of the alternative housing work release program. The results of our review are provided in the attached report.

We would like to thank the management and staff of the Jail and Goodwill for their courtesy and cooperation during this review period.

Very truly yours,



Lori A. Churilla
Assistant Deputy Controller, Auditing



MARK PATRICK FLAHERTY
Controller

cc: Honorable Richard Fitzgerald, President, County Council
Honorable William Russell Robinson, County Council
Honorable Dan Onorato, Chief Executive
Mr. James M. Flynn Jr., County Manager
Ms. Amy Griser, Budget Director
Jail Oversight Board
Mr. Joseph Catanese, Director of Constituent Services
Ms. Jennifer Liptak, Budget Director, County Council
Mr. Michael J. Smith, President and Chief Executive Officer
Goodwill of Southwestern Pennsylvania
Mr. Guy A. Tumolo, Deputy Controller
Mr. Robert J. Lentz, Assistant Deputy, Accounting
Ms. Pamela Goldsmith, Communications Director

EXECUTIVE SUMMARY

Background

The Allegheny County Jail contracts with Goodwill to provide alternative housing work release services for up to 50 male offenders referred by the Jail. The Warden is responsible for compliance monitoring and management oversight of this contract.

Goodwill is a nonprofit corporation which has operated for nearly 40 years since May 1969. The Goodwill Custodial Care Center is for adult males ages 18 and over, who are low public-risk offenders serving a sentence of less than two years. The average length of stay in the Goodwill program is three to six months. In order for a male inmate to be placed at the Goodwill Center he must be referred by the Judge and be cleared both medically and psychologically by the medical provider at the Jail.

The County entered into contract #74255 for the period of three years beginning April 1, 2007 through March 31, 2010 with two one-year renewal options at the discretion of the County. Under this agreement, Goodwill is paid \$50 per day for each inmate placed in the facility by the Jail. The County paid \$549,083 to Goodwill under this contract for the period April 1, 2007 through December 31, 2008. See Schedule I on page 23.

The Goodwill alternative housing program accepts assignees from the Criminal Division of Common Pleas Court for inmates who have been convicted of low public-risk offenses, such as retail theft. Goodwill also accepts assignees from the Family Division of Common Pleas Court for inmates who are serving civil contempt sentences for not paying child support. Any resident who does not comply with the terms of their sentence or violates Goodwill's policies and procedures such as failing a drug or alcohol test, not being accountable for their time and not actively seeking employment are returned to the Jail.

Residents referred by the Jail to Goodwill are required to pay by money order a portion of their net income to Goodwill to offset the Jail's contract costs. Criminal Division assignees pay 20% of their net wages for room and board and 10% toward Court costs, fines and restitution. Family Division assignees pay 20% of their net wages for room and board and 40% of their net pay to the Court for child support until a wage attachment is processed by the employer. Each resident is required to

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perform two hours of community service per week unless employment prohibits their availability to perform this service. Additionally, an eight hour home pass can be earned by successfully completing various levels of the program.

Criminal Division assignees have two program status levels that a resident can attain. These levels include:

- Level I: An orientation period to acclimate residents to the work release environment. During this period, residents actively search for a job or go to their job, schedule and attend AA/NA meetings and provide community service for the first 30 days.
- Level II: In order to advance to this level, the resident must have been in the program for 30 days, obtained full time (32 hours) employment and have demonstrated positive program performance. Level II residents are eligible for one, eight hour home pass per week with a curfew of 10 p.m.

Family Division assignees have four program levels which include:

- Level I: An orientation period to acclimate residents to the work release environment. During this period, a resident is allowed to go to a convenience store after 3 days and is eligible for visits after 5 days.
- Level II: Residents are required to actively search for employment or attend work. Residents will continue in this level until they are hired at a job. Residents may be eligible for short term passes.
- Level III: This phase begins when the first payment is made to PA State Collection Disbursement Unit for child support. Residents are also eligible for one eight hour home pass per week.
- Level IV: This level is for residents who are in the program for more than 4 months and have satisfactory program performance. During this phase, residents are eligible for two eight hour home passes per week.

According to Goodwill's policies and procedures, each eight hour home pass utilized must be approved by the sentencing judge and by Goodwill's Director. The Jail also

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requires that all home passes be approved by the sentencing Judge. All residents who are out on an eight hour home pass must telephone the Center from a landline within 30 minutes of arriving at their destination. A drug and alcohol test is given to all resident upon their return to the facility from an eight hour pass.

During the period of our review from April 1, 2007 to December 31, 2008, Goodwill housed 259 inmates referred by the Jail of which 175 (68%) were employed. Goodwill collected from residents \$66,595 in rent, and \$83,360 in Court costs and child support payments. Goodwill closed its facility on December 19, 2008 for renovations in order to increase the housing capacity of the facility from a 30 bed facility to a 50 bed facility. Goodwill is scheduled to reopen the facility in July 2009.

Results in Brief

During our review, we found:

- Finding #1: Discrepancies with 10 (48%) of the 21 monthly invoices tested. These discrepancies included:
- Goodwill billed the Jail for the incorrect number of days for two residents housed at Goodwill which resulted in an overcharge of \$1,300 to the Jail.
- Eight residents underpaid room and board costs by \$313.15 which resulted in an overcharge to the Jail.
- Goodwill incorrectly reported amounts collected from 6 residents on the room and board report resulting in an overpayment to the Jail of \$121.75.
- Overall, these deficiencies resulted in a total of \$1,491 owed to the Jail.
- Finding #2: Our testing of 14 residents who were granted eight hour passes revealed that 10 (71%) of the residents' passes were not approved by the Family Division sentencing Judge. The other 4 passes which were granted to residents referred by the Criminal Division Judges were approved.
- Finding #3: During our review we noted that resident program levels were not correctly documented according to established policies and procedures. Our testing of 40 residents' program statuses revealed that 14 (35%) residents' program status levels were reported at incorrect program levels.
- We noted that 11 of these 14 residents were documented at being at a Level II status upon entering the program

EXECUTIVE SUMMARY

with no documentation in the file to indicate they were ever at the Level I program status level.

- A Criminal Division resident was listed at a Level III program status of which there is no Level III program status for Criminal Division residents.
- Another resident was listed at Level II but had not been in the program for 30 days.
- One Family Division resident was listed at a Level III and received two eight hour passes when there was no record in the resident's file to indicate he had made a child support payment to the PA SCDU.
- Finding #4: We sampled 40 resident files to determine if the proper community service documentation was complete. We noted that 7 (18%) of the residents did not complete the required community service hours.
- Finding #5: Our testing of the admittance eligibility requirements revealed that 18 (45%) out of 40 residents did not have a medical clearance notification in their file at Goodwill. However, upon further investigation we were able to obtain the medical clearance form from the Jail.

Recommendations

We recommend that Goodwill:

- Finding #1: Establish internal controls to ensure that the calculations of the room and board payments for residents are calculated properly. Also, ensure that reports submitted to the Jail are accurate.
- Reimburse the Jail \$1,491 for the room and board costs.
- Require residents to directly remit their paychecks to Goodwill. Goodwill should calculate the amount owed by the resident for room and board, child support and Court costs. Any remaining funds should be returned by Goodwill through a check to the residents.
- Goodwill should also establish policies and procedures which require the resident to prepare a budget based on their income and require the resident to put a certain percentage of their money into savings. This will help the resident develop responsibility regarding money issues.
- Strengthen internal controls to ensure that residents remit their paychecks to Goodwill and pay room and board, Court costs and child support in a timely fashion.

EXECUTIVE SUMMARY

We recommend that the Allegheny County Jail:

- Ensure that the \$1,491 owed by Goodwill is collected.

We recommend that Goodwill:

- Finding #2: Comply with the Jail's policies and procedures as well as its own Policies and Procedures Manual and the Resident Handbook by obtaining the sentencing Judge's approval for each resident granted an eight hour home pass. Any deviations from this process should be approved by the Jail
- Finding #3: Develop procedures to ensure that a resident's continuous progression in the program is achieved and properly documented.
- Ensure that the Case Managers record residents at the proper program status levels.
- Ensure that the residents receive the proper benefits allotted based on their program status.
- Discontinue the practice of allowing the resident to document their program level status on their weekly schedules.
- Finding #4: Develop written policies and procedures regarding community service to ensure that the resident is held accountable for the hours away from the center.
- Ensure that community service forms are properly completed and maintained in each resident's file.
- Perform periodic inspections of the resident files to ensure the documentation is maintained and newly established policies and procedures are being followed.
- Finding #5: Require personnel to obtain a copy of the medical release form prior to admitting the resident into Goodwill's facility. Management should periodically examine the case files for compliance with this policy and procedure.

Purpose

We reviewed Goodwill's compliance with its contract with the Allegheny County Jail related to the community based alternative housing work release program for male offenders. We performed this review to ensure that Goodwill was in compliance with the scope and terms of the services authorized under the contract. Our review covered the period of April 1, 2007 through December 31, 2008.

Background

The Allegheny County Jail contracts with Goodwill to provide alternative housing work release services for up to 50 male offenders referred by the Jail. The Warden is responsible for compliance monitoring and management oversight of this contract.

Goodwill is a nonprofit corporation which has operated for nearly 40 years since May 1969. The Goodwill Custodial Care Center is for adult males ages 18 and over, who are low public-risk offenders serving a sentence of less than two years. The average length of stay in the Goodwill program is three to six months. In order for a male inmate to be placed at the Goodwill Center he must be referred by the Judge and be cleared both medically and psychologically by the medical provider at the Jail.

The County entered into contract #74255 for the period of three years beginning April 1, 2007 through March 31, 2010 with two one-year renewal options at the discretion of the County. Under this agreement, Goodwill is paid \$50 per day for each inmate placed in the facility by the Jail. The County paid \$549,083 to Goodwill under this contract for the period April 1, 2007 through December 31, 2008. See Schedule I on page 23.

On April 1, 2008 Goodwill Industries of Pittsburgh changed its name to Goodwill of Southwestern Pennsylvania. The Goodwill Industries of Pittsburgh's Community Correction Center also followed suite and changed their name to the Goodwill of Southwestern Pennsylvania Custodial Care Center (Goodwill) in late 2008. In 2001 Goodwill was accredited by the American Correctional Association (ACA) and re-accredited in 2007 by the ACA's Commission on Accreditation for Corrections.

Participation in the Goodwill program requires residents to actively show an effort to find employment within 30 days after arrival. Each resident is then required to work at a job in the community for a minimum of 32 hours a week.

Residents are required to fill out weekly schedules showing all of their out-of-facility activities for the week such as employment, treatment programs, community service and passes which can be obtained based on the resident's progression in the program levels attained while at Goodwill. Each scheduled activity has to include an address, telephone number (landline), contact person and curfew. Before the resident leaves the building for their activities this information is verified by the House Manager who performs random telephone checks to further verify the resident's accountability, along with random in-person visits and employment verifications. The resident is required to call Goodwill once they reach their destination and the location is verified by telephone caller ID.

The Goodwill alternative housing program accepts assignees from the Criminal Division of Common Pleas Court for inmates who have been convicted of low public-risk offenses, such as retail theft. Goodwill also accepts assignees from the Family Division of Common Pleas Court for inmates who are serving civil contempt sentences for not paying child support. Any resident who does not comply with the terms of their sentence or violates Goodwill's policies and procedures such as failing a drug or alcohol test, not being accountable for their time and not actively seeking employment are returned to the Jail.

Residents referred by the Jail to Goodwill are required to pay by money order a portion of their net income to Goodwill to offset the Jail's contract costs. Criminal Division assignees pay 20% of their net wages for room and board and 10% toward Court costs, fines and restitution. Family Division assignees pay 20% of their net wages for room and board and 40% of their net pay to the Court for child support until a wage attachment is processed by the employer. Each resident is required to perform two hours of community service per week unless employment prohibits their availability to perform this service. Additionally, an eight hour home pass can be earned by successfully completing various levels of the program.

Criminal Division assignees have two program status levels that they can attain. These levels include:

- Level I: An orientation period to acclimate residents to the work release environment. During this period, residents actively search for a job or go to their job, schedule and attend AA/NA meetings and provide community service for the first 30 days.
- Level II: In order to advance to this level, the resident must have been in the program for 30 days, obtained full time (32 hours) employment and have demonstrated positive program performance. Level II residents are eligible for one, eight hour home pass per week with a curfew of 10 p.m.

Family Division assignees have four program levels which include:

- Level I: An orientation period to acclimate residents to the work release environment. During this period, a resident is allowed to go to a convenience store after 3 days and is eligible for visits after 5 days.
- Level II: Residents are required to actively search for employment or attend work. Residents will continue in this level until they are hired at a job. Residents may be eligible for short term passes.
- Level III: This phase begins when the first payment is made to PA State Collection Disbursement Unit for child support. Residents are also eligible for one eight hour home pass per week.
- Level IV: This level is for residents who are in the program for more than 4 months and have satisfactory program performance. During this phase, residents are eligible for two eight hour home passes per week.

According to Goodwill's policies and procedures, each eight hour home pass utilized must be approved by the sentencing judge and by Goodwill's Director. The Jail also requires that all home passes be approved by the sentencing Judge. All residents who are out on an eight hour home pass must telephone the Center from a landline within 30 minutes of arriving at their destination. A drug and alcohol test is given to all resident upon their return to the facility from an eight hour pass.

Residents are provided daily meals (breakfast, lunch and dinner) offsite at the Goodwill cafeteria Monday through Friday. This cafeteria is located two blocks away from the housing facility. Resident must sign up 24 hours in advance and are given a meal ticket and ID badge by the House Manager when they sign out for each one hour meal. The resident must sign in and out at the cafeteria. Residents are permitted to have meals delivered at their own expense and must consume the meals in the recreation room at Goodwill. Saturday and Sunday meals are delivered to the facility and consumed in the recreation room at the facility.

Additionally, residents are permitted to sign out daily for 15 minute trips to go to CoGos (a convenience store located across the street from the housing facility), attend religious services outside of the facility once a week for up to 3 hours, schedule haircut appointments for up to 2 hours a month, and make a one hour weekly trip to Giant Eagle, Family Dollar, the Goodwill store and/or ACE check cashing on the South Side. Residents must obtain permission which is noted on their weekly schedules for these privileges.

During the period of our review from April 1, 2007 to December 31, 2008, Goodwill housed 259 inmates referred by the Jail of which 175 (68%) were employed. Goodwill collected from residents \$66,595 in rent, and \$83,360 in Court costs and child support payments. Goodwill closed its facility on December 19, 2008 for renovations in order to increase the housing capacity of the facility from a 30 bed facility to a 50 bed facility. Goodwill is scheduled to reopen the facility in July 2009.

II. Scope and Methodology

We reviewed Goodwill's compliance with its contract with the Allegheny County Jail related to alternative housing work release services for male inmates referred by the Allegheny County Jail. We performed this review to ensure that Goodwill was in compliance with the scope and terms of the services authorized under contract #74255. Our review covered the period of April 1, 2007 through December 31, 2008.

Specifically, we performed the following as part of our review:

- Interviewed Jail and Goodwill personnel involved in the alternative housing work release program to gain an understanding of the internal control structure.
- Reviewed the minutes of the Jail Oversight Board meetings and Goodwill's Board meetings for the period under review through June 2009.
- Examined records of Goodwill and the Jail as they pertain to the agreement to determine compliance with the work release services agreement.
- Reviewed resident files relating to Goodwill's work release program and examined invoice payments from April 1, 2007 through December 31, 2008.
- Reviewed the residents' intake files to ensure that they were referred to the program by the Jail and met eligibility requirements for participation as outlined in the Goodwill's policies and procedures manual.
- Recalculated residents' room and board payments made to Goodwill. This is 20% of the net amount from each paycheck received by the resident.
- Verified that payments received from residents for Court costs and fines were properly remitted by Goodwill to the Department of Court Records.
- Verified through head count reports the number of County residents enrolled at Goodwill.

II. Scope and Methodology

- Verified community service sites and hours were in accordance with the Jail and Goodwill's policies and procedures.
- Verified that residents that were granted eight hour home passes for time outside of the facility met Goodwill's requirements for granting the passes and the passes were authorized by the sentencing Judge.
- Documented the Jail's policies and procedures to ensure compliance with the terms of the agreement and the procedures in place to ensure proper oversight.

We conducted this review during April and May 2009. We provided a draft copy of this report to the President and Chief Executive Officer of Goodwill and the Jail Warden for comment starting on page 24.

Finding #1
Goodwill Should Properly
Invoice the County

As part of the alternative housing work release program, residents are required to remit 20% of their net income for room and board costs, 10% for Court costs and restitution, and 40% for child support. The room and board collected from residents is considered to be program income and is offset against the County's contract billings. In addition, Court costs collected are remitted monthly to the Criminal Division and child support payments are remitted monthly to the Family Division. Residents are required to remit these costs to Goodwill within 5 days of receiving their paycheck.

We reviewed 21 monthly invoices and found discrepancies with 10 (48%) of the invoices.

Our review disclosed that Goodwill billed the Jail for the incorrect number of days for two residents housed at Goodwill which resulted in an overcharge of \$1,300 to the Jail.

Further review revealed 8 residents underpaid room and board costs by \$313.15 which resulted in an overcharge to the Jail.

We also noted that Goodwill incorrectly reported amounts collected from 6 residents on the room and board report resulting in an overpayment to the Jail of \$121.75.

Overall, these deficiencies resulted in a net total of \$1,491 owed to the Jail.

Goodwill requires the residents to pay room and board on all paychecks received while they are in the program, regardless of pay dates or pay periods. For example, if the resident receives a paycheck the first day they are in the program they are required to pay room and board and all other costs. If the resident receives a paycheck the day he leaves the center he must pay the room and board and all other costs. Room and board is not pro-rated based on the number of days the resident is in the program. Goodwill

III. Findings and Recommendations

requires the residents to pay these costs with a money order within 5 days of the pay date.

Our testing of 56 residents revealed that 34 (61%) residents received a paycheck before leaving the program and did not remit the 20% for room and board. The dates ranged between 8 and 70 days from the date listed on the employee verification form until the resident left the program. We also noted that 9 (16%) residents never got a job and therefore never paid any room and board for their stay at Goodwill. These 9 residents stayed at Goodwill from 3 to 102 days.

Recommendations

We recommend that Goodwill:

- Establish internal controls to ensure that the calculations of the room and board payments for residents are calculated properly. Also, ensure that reports submitted to the Jail are accurate.
- Reimburse the Jail \$1,491 for the room and board costs.
- Require residents to directly remit their paychecks to Goodwill. Goodwill should calculate the amount owed by the resident for room and board, child support and Court costs. Any remaining funds should be returned by Goodwill through a check to the residents.
- Goodwill should also establish policies and procedures which require the resident to prepare a budget based on their income and require the resident to put a certain percentage of their money into savings. This will help the resident develop responsibility regarding money issues.
- Strengthen internal controls to ensure that residents remit their paychecks to Goodwill and pay room and board, Court costs and child support in a timely fashion.

We recommend that the Allegheny County Jail:

- Ensure that the \$1,491 owed by Goodwill is collected.

Finding #2

**Eight Hour Home Passes Should be
Approved by the Sentencing Judge**

An eight hour home pass can be earned by successfully completing various levels of the program. Criminal Division residents who achieve Level II status by working 32 hours a week, demonstrate positive performance and have been in the program at least 30 days are eligible for one eight hour home pass per week. Family Division residents that achieve Level III status by working full time and making a child support payment to the PA State Collection Disbursement Unit are eligible for a weekly eight hour home pass. Upon reaching Level IV status, the Family Division resident is eligible for two weekly eight hour home passes.

According to Goodwill's policies and procedures all resident's (Family Division and Criminal Division assignees) eight hour home passes are required to be approved by the sentencing Judge and Goodwill's Director. The location the resident is going to is required to have a landline telephone. The resident must telephone Goodwill within 30 minutes of arriving at their destination and arrive back at the center before the 10:00 p.m. curfew. A drug and alcohol test is given to all residents upon their return to the facility from an eight hour pass. Passes are for the purpose of building a stable community support system. The resident is not permitted to leave the location of the pass site to go to movies, restaurants, stores, malls or any other location. The resident is also not allowed to drive a vehicle while out on a pass.

The Jail's directives also state that daily passes for Allegheny County Jail inmates cannot be granted at the discretion of the alternative housing facility. Only the Court of Common Pleas may grant furloughs or passes to Allegheny County Jail inmates within community based facilities.

Our testing of 14 residents who were granted eight hour passes revealed that 10 (71%) of the residents' passes were not approved by the Family Division sentencing Judge. The other 4 passes which were granted to residents referred by the Criminal Division Judges were approved.

III. Findings and Recommendations

When we inquired about the lack of approval by the Judges for the residents sentenced by the Family Division Judges, we were informed by Goodwill's personnel that upon sentencing by the Family Division Courts, the sentencing document Form 6-A Commitment Form is the only authorization needed by the Family Division resident to authorize each eight hour pass privilege. However, upon reviewing this form, we noted that the form is a commitment form signed by the Judge noting the charges of the resident such as direct criminal attempt or civil attempt and allowing for the resident to be transferred to an alternative housing work release program. It does not mention eight hour passes. Jail personnel agreed that this form is not a substitute for the Judge's approval for the pass.

According to Jail personnel, the policy and procedure of obtaining the sentencing Judge's authorization for the eight hour home passes was instituted to provide tracking for the Courts for when an inmate sentenced to an alternative housing program is permitted to be outside of the housing facility for any reason other than for employment, community service, or medical appointments.

Recommendations

We recommend that Goodwill comply with the Jail's policies and procedures as well as its own Policies and Procedures Manual and the Resident Handbook by obtaining the sentencing Judge's approval for each resident granted an eight hour home pass. Any deviations from this process should be approved by the Jail.

Finding #3
**Goodwill Should Ensure that Residents'
Program Status Level Requirements
Are Being Properly Achieved and Documented**

According to Goodwill's policies and procedures, residents are required to undergo an orientation upon entering the alternative housing work release program. This orientation period lasts 7 days for residents sentenced from the Family Division and 30 days for residents sentenced from the Criminal Division to acclimate them to the work-release environment. The orientation period is considered Level I and residents are considered to be on a probationary status. Pass privileges are not granted at this level. Case managers review the residents' progress in the program to ensure adequate performance.

In order to advance to Level II, residents sentenced from the Criminal Division must be in the program for 30 days, have a full time job (32 hours per week) and have not committed any class I violations and no more than 3 class II or III violations in the previous 30 days. Level II residents are eligible for a weekly eight hour home pass with a curfew of 10 p.m., including travel time.

Residents sentenced from Family Division advance to Level II after a week in the program and remain at this level until they find employment and make their first child support payment to the Pennsylvania State Collection and Disbursement Unit (PA SCDU). Level III begins when the first child support payment is made to PA SCDU. Residents are then eligible for a weekly eight hour home pass. Residents that have been in the program for more than 4 months can obtain a Level IV status which qualifies the resident for two eight hour home passes per week.

During our review we noted that resident program levels were not correctly documented according to established policies and procedures. Our testing of 40 residents' program statuses revealed that 14 (35%) residents' program status levels were reported at incorrect program levels. We noted that 11 of these 14 residents were documented at being at a Level II status upon entering the program with no documentation in the file to indicate they were ever at

III. Findings and Recommendations

the Level I program status level. A Criminal Division resident was listed at a Level III program status of which there is no Level III program status for Criminal Division residents. Another resident was listed at Level II but had not been in the program for 30 days. One Family Division resident was listed at a Level III and received two eight hour passes when there was no record in the resident's file to indicate he had made a child support payment to the PA SCDU.

We were informed that residents are given the responsibility of documenting their program level status on their weekly schedules. These schedules are then to be reviewed by the Case Manager.

Overall, program status benefits should only be awarded to residents who qualify by meeting certain expectations and goals.

Recommendations

We recommend that Goodwill:

- Develop procedures to ensure that a resident's continuous progression in the program is achieved and properly documented.
- Ensure that the Case Managers record residents at the proper program status levels.
- Ensure that the residents receive the proper benefits allotted based on their program status.
- Discontinue the practice of allowing the resident to document their program level status on their weekly schedules.

Finding #4
Community Service Hours
Should be Properly Documented

Goodwill's policies and procedures require residents to complete two hours of community service per week at an agency approved by Goodwill. All community service is to be documented on the resident's weekly schedule and each resident must submit a community service verification form to their Case Manager. The verification form is required to be signed by the designated person at the community center verifying that the resident completed the required service hours and by the House Manager upon their return. The community service documentation is maintained in the resident's file. Residents that work full time may be excused from performing the community service time if their schedule does not allow for the service to be performed.

We sampled 40 resident files to determine if the proper community service documentation was complete. We noted that 7 (18%) of the residents did not complete the required community service hours. According to Goodwill personnel, residents' are permitted to retain the verification form and sometimes forget to return it to the Case Manager when they are released from Goodwill.

To ensure accountability of the residents, verification forms should be complete and maintained in the resident's files to substantiate time away from the center.

Recommendations

We recommend that Goodwill:

- Develop written policies and procedures regarding community service to ensure that the resident is held accountable for the hours away from the center.
- Ensure that community service forms are properly completed and maintained in each resident's file.
- Perform periodic inspections of the resident files to ensure the documentation is maintained and newly

III. Findings and Recommendations

established policies and procedures are being followed.

III. Findings and Recommendations

Finding #5
**Medical Clearances of Residents
Should Be Documented and Maintained**

When an inmate from the Allegheny County Jail is being admitted to an alternative housing program it is the Jail's policy and procedures that each individual referred to an alternative housing program must first be cleared physically and mentally to participate in the program. Even if the resident is referred directly from the Courts, the individual must obtain a physical by a community physician before he can be admitted into the Goodwill program. Those residents that are referred from the Jail receive their clearance from the medical staff employed by the Jail. To confirm that a resident is medically cleared to participate in the alternative housing program, a medical clearance notification is completed for each resident entering the program. Goodwill personnel are required to obtain this documentation before admitting the resident into the facility. Documentation of this admittance requirement is required to be maintained in the resident's case management file.

Our testing of the admittance eligibility requirements revealed that 18 (45%) out of 40 residents did not have a medical clearance notification in their file at Goodwill. However, upon further investigation we were able to obtain the medical clearance form from the Jail.

An inmate that does not obtain the proper medical clearance could possibly be admitted into the Goodwill program with health related issues. This could result in the inmate being returned to the Jail. Additionally, an inmate with mental health issues could harm the staff, other residents, or themselves.

Recommendations

We recommend that Goodwill require personnel to obtain a copy of the medical release form prior to admitting the resident into Goodwill's facility. Management should periodically examine the case files for compliance with this policy and procedure.

**Goodwill of Southwestern Pennsylvania
Custodial Care Center - Alternative Housing Work Release Program
Schedule of Contract Payments
for the Period April 1, 2007 through December 31, 2008**

Date	Number of Housed Inmates	Room and Board Charges	Less: 20% Room and Board Paid by Residents	Amount Paid to Goodwill by the Jail
Apr-07	39	\$38,428	\$4,136	\$34,292
May-07	38	42,650	5,513	37,137
Jun-07	33	34,200	4,700	29,500
Jul-07	31	33,350	3,439	29,911
Aug-07	29	28,900	2,979	25,921
Sep-07	29	35,750	2,962	32,788
Oct-07	35	41,050	3,766	37,284
Nov-07	35	40,400	4,123	36,277
Dec-07	31	35,800	2,458	33,342
Jan-08	28	38,750	4,357	34,393
Feb-08	33	34,650	3,440	31,210
Mar-08	35	40,900	2,316	38,584
Apr-08	31	39,000	2,431	36,569
May-08	32	41,300	4,037	37,263
Jun-08	25	31,150	4,757	26,393
Jul-08	18	24,150	4,057	20,093
Aug-08	13	14,150	2,321	11,829
Sep-08	6	8,000	1,898	6,102
Oct-08	3	3,900	1,063	2,837
Nov-08	5	6,300	1,311	4,989
Dec-08	4	2,900	531	2,369
Totals		\$615,678	\$66,595	\$549,083



Robert S. Foltz Building
2600 East Carson Street
Pittsburgh, PA 15203-2102

Phone: 412-481-9005

Fax: 412-481-3668

www.goodwillswpa.org

July 9, 2009

Lori Churilla
Assistant Deputy Controller, Auditing
Office Of The Controller
104 Courthouse
436 Grant Street
Pittsburgh, PA 15219 – 2498

Dear Mrs. Churilla,

Please see our attached response to the Contract Compliance Review of Goodwill of Southwestern Pennsylvania Custodial Care Center for Work Release Services for the period April 1, 2007 through December 31, 2008. We have also prepared an electronic version of this document that will be forwarded to you as well.

We hope this response sufficiently addresses the findings included in the audit. Please feel free to contact me at (412) 390-2275 should you have any additional questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to be "Mike Smith". The signature is written in a cursive style with a large, sweeping flourish at the end.

Mike Smith
CEO / President
Goodwill of Southwestern Pennsylvania

AFFILIATES

Goodwill of Fayette County
Goodwill of North Central West Virginia
Goodwill Housing
Goodwill Commercial Services Inc.
Northside Common Ministries

Our Mission

We help people improve their quality
of life through work and related services.

The Goodwill Center

Response to audit

Finding #1 – Establish internal controls to ensure that calculations for room and board are properly calculated and to ensure reports to the county jail are accurate.

Response:

Traditionally residents have been allowed to cash their paychecks and remit to the Goodwill Center their pay stub and a money order for the amount of room and board (subsistence and other payments such as child support payments, fines, costs, etc.) Even though residents were provided a budget sheet detailing the amount owed to the county they did not always pay the correct amount. Consequently, an inordinate amount of time was spent collecting these arrearages with some residents discharging before the full amount could be collected.

We concur that eliminating the residents from the responsibility of turning in only the amount owed would strengthen the collection process and lead to fewer errors.

To correct this issue, the facility has initiated a new policy and associated procedures (see attachments), which will require residents to turn in their paychecks to the Goodwill Center. Case managers will prepare a budget sheet deducting the proper amount for room and board, child support payments, fines, costs and restitution. A copy of the budget sheet will be forwarded to the administrative assistant for billing purposes. Goodwill's accounting department will process the paycheck disbursing payment to the proper sources, (with documentation sent to the center's case managers and residents) and the balance will be remitted to the residents. By eliminating the resident element from the process and implementing the above outlined procedures, adequate controls should be in place to bring our fee-collection process in compliance with the recommendations in the report. Additionally, budget sheets are now excel spreadsheets, which automatically perform mathematical calculations to eliminate errors by case managers.

Finding #2 – Judges should approve all 8-hour home passes.

Response:

The facility's current policy is that all Criminal Division home passes must be approved by the sentencing judge. This process is followed 100% of the time with no exceptions.

The facility has had a long-standing verbal agreement with the Family Division that they would not give approval for individual passes. Rather they gave a blanket approval for any Family Division resident who met the facility's criteria for an 8-hour pass. This was done as a means of incentivising residents for paying child support in a timely manner and as a positive reinforcement for good program participation. The pass process has

proven to be a strong motivator for positive behavior, particularly with the Family Division population.

We are currently in communication with the Family Division (through its administrator) regarding pass approvals. We have been advised that the issue of judge's approval for passes at the Goodwill Center has been placed on the agenda for their August meeting. No passes for Family Division residents will be approved until written documentation is received from the Family Division. (The Family division has been advised of this audit and the need for resolution on this issue.)

Finding #3 – Develop procedures for tracking a resident's progress through the program.

Response:

Presently, case managers, in concert with the resident, develop a comprehensive re-integration plan, identifying socio-criminogenic deficits and making program recommendations to address them. Residents can utilize community resources as well as the program resources of Goodwill of SWPA. The Re-integration plan is regularly reviewed and updated. Additionally, progress is noted in weekly case notes prepared by the case manager.

The level system referred to in this report had only limited utility. Residents were not afforded additional internal privileges based on level. Its primary use was to provide a quick reference for pass eligibility. (As a crosscheck, prior to being approved, the Director reviewed all eligibility criteria to ensure that the resident was indeed eligible for the pass (including level) before signing off on the pass.)

To correct this issue, the facility has developed a low-point internal classification system to accurately and systematically assign levels. (see attachment) Residents will be classified every 30 days (or sooner if events would change their classification status). The level designation has been removed from the resident's weekly schedule so residents will not be inclined to change it or write it in on their own. (The level on the schedule served no purpose as the level was reviewed and calculated prior to any privilege being granted.) Levels will be recorded on the master record card and in the resident file.

Finding #4 – Community Service hours should be properly documented.

Response:

Resident accountability has always been a core element of the Goodwill Program. Anytime residents leave the building, written documentation is required to ensure accountability. Community service hours were documented, however, due to the process we used, hardcopies were not always in the files. The process of verification we utilized conserved paper and reduced file clutter.

Community service locations were verified and the resident was issued a form, which the community service supervisor signed and dated to verify attendance. Up to 4 months of verifications could be placed on one form. When the resident returned from his community service location, he would turn in the verification form to the house manager on duty, who would record it in the logbook. He would then forward the form to the resident's case manager, who would note the attendance. The form was then returned to the resident, to use for the next week. This process was repeated until the form was completely filled and a new one was issued.

When residents escaped or were returned to jail, forms were rarely recovered. When residents discharge or parole, their last priority is turning in archival paperwork. Consequently, although the verification paperwork existed, it was not always turned in for placement in the file.

The Goodwill Center has developed new procedures and new documentation forms which will be "one-use-only". (See attachment) We will no longer archive multiple verifications on a form for reoccurring events such as community service or NA or AA meetings. When residents return from community service, they will turn in their "one-use-only" verification form to the house manager, who will enter it into the logbook. He will forward it to the case manger who will note the attendance and place it in the resident file. A new verification form will be issued for the next event.

Finding #5 – Medical clearances should be documented and maintained.

Response:

The jail will not allow inmates to be transferred to alternative housing facilities without proper medical clearances. Although documentation was not always in the file, the facility never received an inmate who did not have medical clearance.

In order to receive an inmate, the facility notifies the jail's medical provider by fax (on forms they provide) of the facility's request to bring an inmate to the Goodwill Center. The medical provider will conduct a medical/psychological exam. If the inmate is physically and psychologically fit for alternative housing, the jail faxes a medical clearance to the Goodwill Center approving the transfer and noting any medications or physical/psychological diagnoses. The house manager takes the medical clearance form to the booking desk at the jail, gives them the form and the jail processes the inmate for transfer. Jail personnel would not always return the form after processing.

In order to ensure that the medical clearance documentation is always in the resident file, the Goodwill Center will make an extra copy of the clearance when it is received, and forward it to the administrative assistant. This will be the first document utilized to set up the file for incoming residents. The document will not be removed from the file, but a copy will be made for the transporting house manager to take with him to the jail.

Summary

It should be noted that the Goodwill Center had not undergone a comprehensive program audit by the county for a number of contract cycles. Consequently, many of our procedures had not been subject to comprehensive external review. Processes and routines, which were not seen as problematic by internal review, were replicated for years.

We understand the need for process improvement and strive to utilize best practices in the operation of our facility. The deficits outlined in this report will be addressed through the changes to policies and procedures detailed in our response.

As a further check and balance that our documentation is complete, we have executed a new file closeout and archiving policy (see attachment) that requires case managers to use a quality assurance checklist to ensure all records are complete before closing out a file for archiving.

POLICIES AND PROCEDURES



ACA DOCUMENT NO. 4-ACRS-7D-33	GOODWILL DOCUMENT NO. HSCCC - 70570	PAGE: 1 OF 2
UNIT: THE GOODWILL CENTER		
SUBJECT: FINES AND PAYMENTS	EFFECTIVE DATE: FEBRUARY 16, 2000	REVISION DATE: JAN 16, 2004 OCT 23, 2006 OCT 15, 2008 MAY 29, 2009
PREPARED BY: DAVID SEDON	APPROVED BY: MIKE GILMORE	APPROVED BY: ERIC YENERALL FOR MIKE SMITH

1.0 **PURPOSE**

The Goodwill Center has a procedure, which requires all residents to pay fees for rent, court costs, child support, fines and restitution.

2.0 **SCOPE**

All residents

3.0 **GENERAL AUTHORITY AND RESPONSIBILITY**

The Director of The Goodwill Center has the authority and responsibility to resolve any fee and payment issues not addressed in this policy.

4.0 **REFERENCE DOCUMENTS**

See performance based standards (4th Edition) summary sheet.

5.0 **RECORDS**

See file tab 2, 3, 4, 5, 6

6.0 **POLICY**

The Goodwill Center requires all residents to pay fees for rent, court costs, child support, fines and restitution.

All Allegheny County Jail Criminal Division residents are required to pay 30% of their net wages each pay period. (20%) shall be deducted for rent and 10% for court costs, fines and restitutions.

Family Division residents are required to pay 60% of their net wages each pay period. (20%) for rent and 40% for child support. The Center will collect the 40% child support until their employer deducts it directly from their paycheck.

\$20 will also be deducted one time for a linen deposit. This money will be returned upon a resident's release, if all linens are returned in good conditioned and are laundered.

ACA DOCUMENT NO. 4-ACRS-7D-33	GOODWILL DOCUMENT NO. HSCCC-70570	PAGE: 2 OF 2
SUBJECT: FINES AND PAYMENTS	EFFECTIVE DATE: FEBRUARY 16, 2000	REVISION: DATE: JANUARY 16, 2004 OCTOBER 23, 2006 OCTOBER 15, 2008 MAY 29, 2009

Residents are required to turn in their paycheck, (including pay stub) to the house manager on duty, prior to cashing it. Paychecks are to be turned in within 5 days of the pay date. Residents will be given a receipt by the house manager for the net pay amount.

Case managers will process the paychecks the next business day and complete a budget sheet detailing what amount is to be deducted for subsistence, child support, fines and costs as well as the amount the resident will retain. A copy of the budget sheet will be sent to the Accounting Office and 2 copies will be given to the resident. The paycheck, budget sheet and any other documentation will be forwarded to GWSPA's Accounting Department no later than the next business day for processing.

The Accounting Department issues printed checks to The Goodwill Center's case managers for mailing to the County Clerk of Courts, Pennsylvania Support Collection and Disbursement unit and the resident.

A monthly invoice detailing the amount of child support, fines and costs and subsistence will be forwarded to the Allegheny County Jail for billing purposes.

**THE GOODWILL CENTER
RESIDENT BUDGET SHEET
CRIMINAL DIVISION**

RESIDENT NAME		ID #		DATE
		52300		5/18/2009

INCOME:				
NET INCOME				\$ 190.00
OTHER INCOME (note:				\$ 50.00
TOTAL INCOME:				\$ 240.00

DEDUCTIONS:				
RENT (20% of total income)				\$ 48.00
COURT COSTS/FINES/RESTITUTION (10% of total income)				\$ 24.00
OTHER				
LINEN DEPOSIT (\$20) (2170)				\$ 20.00
TOTAL DEDUCTIONS:				\$ 92.00
TOTAL BALANCE DUE RESIDENT:				\$ 148.00

Resident Signature: _____	Date: _____
---------------------------	-------------

Staff Signature: _____	Date: _____
------------------------	-------------

Date Resident received balance _____	Staff Initials _____
--------------------------------------	----------------------

**THE GOODWILL CENTER
RESIDENT BUDGET SHEET
FAMILY DIVISION**

RESIDENT NAME		ID #		DATE
		52300		5/18/2009

INCOME:				
NET INCOME				\$ 190.00
OTHER INCOME (note:				\$ 50.00
TOTAL INCOME:				\$ 240.00

DEDUCTIONS:				
RENT (20% of total income)				\$ 48.00
CHILD SUPPORT (40%) (2180)				\$ 96.00
OTHER				
LINEN DEPOSIT (\$20) (2170)				\$ 20.00
TOTAL DEDUCTIONS:				\$ 164.00
TOTAL BALANCE DUE RESIDENT:				\$ 76.00

Resident Signature: _____ Date: _____

Staff Signature: _____ Date: _____

Date Resident received balance _____ Staff Initials _____

POLICIES AND PROCEDURES



ACA DOCUMENT NO. 4-ACRS-5A-14	GOODWILL DOCUMENT NO. HSCCC – 50140	PAGE: 1 OF 3
UNIT: THE GOODWILL CENTER		
SUBJECT: INCREMENTAL RESPONSIBILITY	EFFECTIVE DATE: AUGUST 23, 2004	REVISION DATE: DEC 01, 2006 SEPT 17, 2008 MAY 29, 2009
PREPARED BY: MIKE GILMORE	APPROVED BY: MIKE GILMORE	APPROVED BY: ERIC YENERALL FOR MIKE SMITH

1.0 PURPOSE

The Goodwill Center residents gradually increase responsibility in the community by utilizing a pass system which is earned by offenders achieving appropriate levels of achievement.

2.0 SCOPE

All Goodwill Center residents

3.0 GENERAL AUTHORITY AND RESPONSIBILITY

The Director of the Goodwill Center has the authority and responsibility to resolve any incremental responsibility issues not addressed in this policy.

4.0 REFERENCE DOCUMENTS

See performance based standards (4th Edition) summary sheet.

5.0 RECORDS

See file tab 2, 3

6.0 POLICY

Father's in Transition (FIT Division)

The Goodwill Center will administer a program for adult males who have been adjudicated by the Allegheny County Family Division Court. The program (Father's in Transition) will focus on teaching job-seeking and job-finding skills, integrating residents into the job market, and monitoring payment of child support arrearages within the context of a community correctional setting.

PROCEDURE

Each week, the Family Division Court will fax a list of those persons eligible for the program to the Director of Goodwill Center. The list will be screened by the Director or designee for acceptance into the program. After screening, the list of those accepted and rejected will be faxed to the Administrative Assistant at the Family Division Court.

ACA DOCUMENT NO. 4-ACRS-5A-14	GOODWILL DOCUMENT NO. HSCCC-50140	PAGE: 2 OF 3
SUBJECT: INCREMENTAL RESPONSIBILITY	EFFECTIVE DATE: AUGUST 23, 2004	REVISION: A DATE: DEC 01, 2006 SEPT 17, 2008 MAY 29, 2009

Residents will progress through the program within the following levels:

LEVEL I- (ORIENTATION PHASE) — 7 days

During this phase, residents are oriented to the program and given the opportunity to adjust to the Goodwill Center's setting. The program guidelines and philosophy is explained and rules and procedures are emphasized. Case Managers complete all intake paperwork and a program plan is developed. Passes will only be granted for basic program requirements such as medical, court visits, etc. After 3 days, a resident will be permitted to go to Co Go's. Residents are eligible for visits after 5 days.

LEVEL II- (EMPLOYMENT PHASE)

During this phase, residents will develop an employment search plan and begin a career development plan. Career Link at Goodwill would be available to assist them. Short-term passes will be given. Residents will continue in this level until they make their first payment to PA SCDU.

LEVEL III- (REINTEGRATION PHASE)

This phase begins when the first payment is made to PA SCDU. In this phase, the resident maintains full time (32 hours per week) employment and continues to pay arrearages. Case Managers will review cases on a monthly basis to ensure that residents are making adequate progress in this level. Residents are eligible for one eight-hour pass per week.

LEVEL IV

This level is for individuals who have been in the program more than 4 months and have satisfactory program performance. During this phase, the resident will be eligible for two eight-hour passes per week. Case Managers will review cases on a monthly basis to ensure residents are making adequate progress in the level.

Residents will have an initial level classification within 5 days of arrival.

Residents will have their levels reclassified every 30 days (or sooner if their status changes through loss of job or disciplinary violation.)

For Levels III and IV, residents must demonstrate positive program performance, (no Class I violations in the previous 30 days and no more than 3 Class II or III violations in the previous 30 days.)

Residents are required to have employment within 30 days of achieving Level II status. Residents may not be self-employed. Pay stubs must accurately show hours worked and net wages. 40% of the net income will be paid toward child support arrearages until the employer makes wage deductions for child support. Payment will be made through the Goodwill Accounting Office of PA SCDU – PO Box 69110, Harrisburg,

ACA DOCUMENT NO. 4-ACRS-5A-14	GOODWILL DOCUMENT NO. HSCCC-50140	PAGE: 3 OF 3
SUBJECT: INCREMENTAL RESPONSIBILITY	EFFECTIVE DATE: AUGUST 23, 2004	REVISION: A DATE: DEC 01, 2006 SEPT 17, 2008 MAY 29, 2009

PA 17106. To ensure proper crediting and program compliance, all child support payments must be made either through payroll deduction or through The Goodwill Center. Residents will also pay 20% of their net wages for subsistence and make an initial \$20 deposit for linens. The linen deposit will be refunded if at the time of their release the linens are returned laundered and in good condition.

Case Managers, in conjunction with the resident, will develop a program plan within 5 days of arrival. The plan will focus on employment, child support and family issues, but will also include standard Center program plan elements. All residents will be referred to the Fatherhood Collaborative and Goodwill's jail re-integration program if eligible.

CRIMINAL DIVISION

The Goodwill Center utilizes a level system to determine increased responsibility and community access. Increased responsibility is only given to those who have demonstrated positive performance in the program.

Level I:

Level I is an orientation/adjustment period used to acclimate residents to the work-release environment. During this period, residents job search, work, set up and attend AA/NA meetings and community service. After 3 days, a resident will be permitted to go to CoGo's. Residents are eligible for visits after 5 days. They are also allowed to leave the building for meals, medical care and other program requirements as designated by case managers. Level I residents are on probationary status.

Level II:

In order to advance to Level II (regular program status) residents must meet the following requirements:

- A. Must have been in the program 30 days
- B. Must have a full time job (32 hours per week)
- C. Must have demonstrated positive program performance. Residents will have an initial level classification within 5 days of arrival. (No Class I violations in the previous 30 days and no more than 3 Class II or Class III violations in the previous 30 days.)

Residents will have their levels reclassified every 30 days (or sooner if their status changes through loss of job or disciplinary violation).

Level II residents are eligible for one, 8-hour home pass per week with a curfew of 10 PM (including travel time).

**Level Reclassification
Criminal Division**

Name:	Initial	Reclassification (circle one)	Date:
Offense:		Sentence:	

1. Time in the program:	Score:
Date of CCC admission:	
Days in CCC program:	
Key: If less than 30 days = I More than 30 days = II	

2. Employment:	Score:
Employed: Yes or No (circle one)	Employer:
Full time (32 hrs or more per week): Yes or No (circle one)	Date of Employment:
Key: If unemployed or employed part-time = I If employed full-time = II	

3. Program Performance:	Score:
Date of last Class I violation:	
Number of Class II or Class III violations in past 30 days:	_____
Date: _____	
Date: _____	
Date: _____	
Key: Class I violation in past 30 days = I No Class I violations in past 30 days = II More than 3 Class II or III violations in last 30 days = I Less than 3 Class II or Class III violations in last 30 days = II	

In order to calculate the level, record the lowest rating in the "score" subsection area. This will give you the overall level.

LEVEL:

Case Manager: _____ Date: _____

Date of next Level Reclassification: _____

**Level Reclassification
Family Division**

Name:	Initial	Reclassification (circle one)	Date:
Purge Condition:			

1. Time in the program:	Score:
Date of CCC admission:	
Days in the CCC program:	
Key: 1-7 days = I 8 - 119 days = II 120 days = IV	

2. Employment:	Score:
Employed: Yes or No (circle one)	Employer:
Full time (32 hrs or more per week): Yes or No (circle one)	Date of Employment:
Key: If unemployed or employed part-time = II If employed full-time = IV	

3. Payments to PA SCDU:	Score:
Payment made to PA SCDU: Yes or No (circle one)	Date of First Payment:
Key: No Payment made: = II Payment made: IV	

4. Program Performance:	Score:
Date of last Class I violation:	
Number of Class II or Class III violations in past 30 days: _____	
Date: _____	
Date: _____	
Date: _____	
Key: Class I violation in past 30 days = II No Class I violations in past 30 days = IV More than 3 Class II or III violations in last 30 days = II Less than 3 Class II or Class III violations in last 30 days = IV	

In order to calculate the level, record the lowest rating in the "score" subsection area. This will give you the overall level.

LEVEL:

4-ACRS-5A-14

Case Manager: _____ Date: _____

Date of next Level Reclassification: _____

**THE GOODWILL CENTER
COMMUNITY SERVICE VERIFICATION**

_____ is a participant in a residential program at The Goodwill Center.
Resident Name

Consequently, his attendance at your community service site must be verified. Please sign this document to verify his attendance. If you have any questions, please call 412-381-2676.

Community Service Name/Location

Name & Title

Date

Time

Resident: Please turn this document in to the house manager on duty upon your return to the facility:

For staff use only

Received by house manager:

House Manager Name

Date

Time

House manager: Please forward this document to case manager at the end of your shift.

Received by case manager:

Case Manager Name

Date

**THE GOODWILL CENTER
AA/NA VERIFICATION**

_____ is a participant in a residential program at The Goodwill Center.

Resident Name

Consequently, his attendance at your meeting must be verified. Please sign this document to verify his attendance. If you have any questions, please call 412-381-2676.

Meeting Name/Location

Name & Title

Date

Time

Resident: Please turn this document in to the house manager on duty upon your return to the facility:

For staff use only

Received by house manager:

House Manager Name

Date

Time

House manager: Please forward this document to case manager at the end of your shift.

Received by case manager:

Case Manager Name

Date

POLICIES AND PROCEDURES



ACA DOCUMENT NO.	GOODWILL DOCUMENT NO. HSCCC – 70332	PAGE: 1 OF 1
UNIT: THE GOODWILL CENTER		
SUBJECT: FILE CLOSEOUT & ARCHIVING	EFFECTIVE DATE: MAY 1, 2009	REVISION DATE: MAY 29, 2009
PREPARED BY: MIKE GILMORE	APPROVED BY: MIKE GILMORE	APPROVED BY: ERIC YENERALL FOR MIKE SMITH

1.0 **PURPOSE**

The Goodwill Center has a procedure of checks and balances that ensure that when residents leave the facility that all subsistence, fines, costs, linen deposit and child support payments have been properly credited before the file is placed in an inactive system.

2.0 **SCOPE**

All Goodwill Center Case Managers and Administrative staff

3.0 **GENERAL AUTHORITY AND RESPONSIBILITY**

The Director of The Goodwill Center has the authority and responsibility to resolve any financial quality assurance issues not addressed in this policy.

4.0 **REFERENCE DOCUMENTS**

See performance based standards (4th Edition) summary sheet.

5.0 **RECORDS**

See file tabs 2, 3, 4, 5

6.0 **POLICY**

It is the responsibility of the case manager assigned to the resident to terminate each resident file and prepare it for archiving. The archive period is seven years. Case managers should prepare termination reports within 7 days of a resident's release. Before the file is given to the administrative assistant for archival filing, the case manager shall ensure that all necessary documentation is contained in the file and that all financial records (pay stubs, subsistence, fines and costs, child support) are complete and in the file. If any documentation is incomplete (i.e. last pay stub or payment not made due to discharge, etc.) a written summary will be prepared citing the circumstances. Once a case manager determines that the file is complete, they will fill out a quality assurance checklist and submit it and the file to the administrative assistant for archiving.

**THE GOODWILL CENTER
QUALITY ASSURANCE**

RESIDENT	ARRIVAL DATE	CASE MANAGER

DATE OR COMMENTS

Orientation completed within 24 hours

Intake completed within 72 hours and all required forms signed.

Medical Clearance filed

Medication logged complete and secured

Initial urine sample procured within 24 hours of arrival

6A received and face sheet filed in House Manager's office and resident file

PPP initialized within 5 days and signed within 13 days

Resident card, internal forms prepared and start sheet forwarded to CT

Weekly case notes filed monthly

Employment letter returned within 5 days

Resident budget forms returned and filed

Community Service and AA/NA Verifications filed weekly

Monthly review of Resident's level advancement-denoted in case notes
And on Level Reclassification Form

Case Manager's Signature

Date

Case Manager's Signature

Date

4-ACRS-7D-02

Case Manager's Signature

Date

Case Manager's Signature

Date

Case Manager's Signature

Date

Case Manager's Signature

Date

Case Manager's Signature

Date

Case Manager's Signature

Date

Case Manager's Signature

Date

Case Manager's Signature

Date

**THE GOODWILL CENTER
RESIDENT RELEASE
QUALITY ASSURANCE CHECKLIST**

RESIDENT	ARRIVAL DATE	CASE MANAGER
DIVISION	RELEASE DATE	METHOD

ALL COURT COST PAYMENTS REQUESTED AND COPY OF CHECKS FILED _____

DATE FINAL COURT COST PAYMENT MAILED _____

DATE LINEN REFUND REQUESTED _____

DATE LINEN REFUND MAILED _____

ALL CHILD SUPPORT PAYMENTS REQUESTED AND COPY OF CHECKS FILED _____

DATE FINAL CHILD SUPPORT PAYMENT MAILED _____

DID RESIDENT PAY ALL LINEN, RENT, COURT COSTS, AND CHILD SUPPORT DUE? _____
(Note amounts, reasons and penalties in summary)

DATE TERMINAL PREPARED AND MAILED (10 days limit) _____

IF ESCAPE OR RETURN, DATE PERSONAL BELONGINGS PACKED UP _____

DATE PERSONAL BELONGINGS PICKED UP BY FAMILY MEMBER _____

WRITE A SUMMARY OF THEIR STAY NOTING ANY UNRESOLVED ISSUES, REASONS FOR ARREARAGES, ETC.:

CASE MANAGER SIGNATURE

DATE

SUBSISTENCE POLICY

As a condition of participating in The Goodwill Center program, all residents under sentence from the Criminal Division of the Allegheny County Court are required to pay subsistence from their total net earnings. Subsistence will be calculated at the rate of 20% for rent and 10% for fines, costs and restitution. Money collected for fines, costs and restitution will be processed by the Goodwill Accounting Department and forwarded to the Department of Records – Criminal Division.

Residents under sentence from the Family Division are required to pay subsistence from their total net earnings at the rate of 20% for rent and 40% for child support arrearages. Child support payments will be paid by the Goodwill Accounting office to PA SCDU. Once a resident's employer has attached his wages for child support, the resident will pay 20% rent and his employer will be responsible for sending child support payments to PA SCDU. To ensure proper crediting, all child support payments must be made in accordance with this system. Residents cannot make payments directly to PA SCDU.

Criminal Division residents are required to pay fines, costs and restitution while at The Goodwill Center unless they can provide documentation from the court that all fees have been paid and that they owe nothing. Those residents who have a pre-existing payment plan for fines, costs and restitution when they enter the program may continue that payment plan if they have a coupon book for payment. Residents are requested to turn in a receipt showing that monthly payments have been made.

All payments will be monitored by The Goodwill Center case management staff.

Residents are responsible for paying subsistence on all paychecks they receive while they are in the program, regardless of pay dates or pay period. For example, if you receive a paycheck the first day you are in the program, you must pay subsistence on it. If you receive a paycheck the day you leave, you must pay subsistence on it. Subsistence will not be pro-rated, based on the number of days you are in the program, nor will refunds be made. (Except for linen deposits or over-payment of fines and costs).

All residents are required to turn in their paycheck, (including pay stub showing the pay period, rate of pay, hours worked, and deductions) to the house manager on duty. The house manager will give them a receipt for the net amount of the paycheck. Paychecks must be turned in within 5 days of the pay date or a disciplinary sanction will be issued. Residents failing to submit paychecks may be returned to the Allegheny County Jail.

Within one business day, case managers will process paychecks. Checks will be forwarded to the Goodwill Accounting Department where the appropriate deductions for subsistence, fines and costs and child support will be deducted and forwarded to the appropriate agency. A check for the remaining amount will be forwarded to the resident.

Disciplinary action will be taken if you fail to turn in your paycheck within 5 days of the pay date.

Residents must make a \$20 linen deposit. The deposit will be refunded by the Goodwill Accounting Department after the resident's release if the linens are laundered and returned to the house manager in good condition. No linen deposit refund will be made to residents who escape or who are returned to jail.

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PROGRAM STATUS LEVEL REQUIREMENTS
(CRIMINAL DIVISION)

LEVEL I

Level I is an orientation/adjustment period used to acclimate residents to the work-release environment. During this period, residents job search, work, set up and attend AA/NA meetings and community service. After 3 days, a resident will be permitted to go to CoGo's. Residents are eligible for visits after 5 days. They are also allowed to leave the building for meals, medical care and other program requirements as designated by case managers. Level I residents are on probationary status.

LEVEL II

In order to advance to Level II (regular program status) residents must meet the following requirements:

- A. Must have been in the program 30 days
- B. Must have a full time job (32 hours per week)
- C. Must have demonstrated positive program performance. Residents will have an initial level classification within 5 days of arrival.
(No Class I violations in the previous 30 days and no more than 3 Class II or Class III violations in the previous 30 days.)

Residents will have their levels reclassified every 30 days (or sooner if their status changes through loss of job or disciplinary violation).

Level II residents are eligible for one, 8-hour home pass per week with a curfew of 10 PM (including travel time).

5/09

4-ACRS-5A-14
2.0 (CRIMINAL)

Fathers in Transition

Level Progression

(Family Division)

LEVEL I- (ORIENTATION PHASE)- 7 days

During this phase, residents are oriented to the program and given an opportunity to adjust to The Goodwill Center's setting. The program guidelines and philosophy is explained and rules and procedures are emphasized. Case Managers complete all intake paperwork and a program plan is developed. Passes will only be granted for basic program requirements such as medical, court visits, etc. After 3 days, a resident will be permitted to go to CoGo's. Residents are eligible for visits after 5 days.

LEVEL II- (EMPLOYMENT PHASE)

During this phase, residents will develop an employment search plan and begin a career development plan. Career Link at Goodwill would be available to assist them. Short-term passes will be given. Residents will continue in this level until they get a job and make their first payment to PA SCDU.

LEVEL III- (REINTEGRATION PHASE)

This phase begins when the first payment is made to PA SCDU. In this phase, the resident maintains full time (32 hours per week) employment and continues to pay arrearages. Case Managers will review cases on a monthly basis to ensure that residents are making adequate progress in this level. Residents are eligible for one eight-hour pass per week.

LEVEL IV

This level is for individuals who have been in the program more than 4 months and have satisfactory program performance. During this phase, the resident will be eligible for two eight-hour passes per week. Case Managers will review cases on a monthly basis to ensure residents are making adequate progress in the level.

Residents will have an initial level classification within 5 days of arrival.

Residents will have their levels reclassified every 30 days (or sooner if their status changes through loss of job or disciplinary violation.)

For Levels III and IV, residents must demonstrate positive program performance, (no Class I violations in the previous 30 days and no more than 3 Class II or III violations in the previous 30 days.)

Residents are required to have employment within 30 days of achieving Level II status. Residents may not be self-employed. Pay stubs must accurately show hour worked and net wages. 40% of the net income will be paid toward child support arrearages until the employer makes wage deductions for child support. Payment will be made through the Goodwill Accounting Office to PA SCDU --P.O. Box 69110, Harrisburg, PA 17106. To ensure proper crediting and program compliance, all child support payments must be made either through payroll deduction or through The Goodwill Center. Residents will also pay 20% of their net wages for subsistence and make an initial \$20 deposit for linens. The linen deposit will be refunded if at the time of their release, the linens are returned laundered and in good condition.

Case Managers, in conjunction with the resident, will develop a program plan within 5 days of arrival. The plan will focus on employment, child support and family issues, but will also include standard The Goodwill Center program plan elements. All residents will be referred to the Fatherhood Collaborative and Goodwill's jail re-integration program if eligible.

2.0 (FIT)

5/09 4-ACRS-5A-14

PASS REQUEST POLICY

Once a resident becomes eligible he must submit, on a form provided for this purpose, a written request for Pass Privileges. The pass request will be filled out to include pass location, pass sponsor, telephone number (no cell phone number), time and date of the pass. All passes have a 10:00 PM curfew.

All Pass request forms must be returned to the Case Manager as follows: Requests for passes for Tuesday through Friday, submit by 3 PM the day prior. For Saturday through Monday, submit by 3 PM Friday.

In order to receive an 8-hour pass, residents must meet the following requirements:

Must be Level II (Criminal Division) or Level III (Family Division)

- A. Passes must be approved by sentencing judge
- B. You must have worked 32 hours the preceding week (as verified by pay stub)
- C. No Class I violations for 30 days; no class II or III violations for 10 days.
- D. No pending disciplinary violations
- E. You must be employed
- F. Pass sponsor must have landline telephone with no call forwarding.
- G. Resident must have paid his linen deposit and be up to date on subsistence and fines and costs payments
- H. Pass must be approved by the center's Director

Passes are for the purpose of building a stable community support system. You must remain at the pass locations the entire durations of your pass. You cannot leave to go to the movies, restaurant, store, mall or any other locations. You must call The Goodwill Center within 30 minutes of your arrival at your pass location. The facility may do follow-up location verification calls during your pass period. You will be given a drug/alcohol test upon your return from pass. No passes may be taken outside of Allegheny County. You are not permitted to drive a motor vehicle while on pass.

Upon arrival at your pass location, you must call The Goodwill Center for accountability verification. The House manager may do random telephone verifications of your pass location to further ensure accountability. If you are given permission to change pass locations for any reason, you must call when you leave the original pass location and call again when you reach your second location.

FINAL APPROVAL OF PASS PRIVILEGES IS DETERMINED BY THE GOODWILL CENTER DIRECTOR AFTER REVIEWING THE REQUEST.

Pass requests involving residents' visits to funerals, hospitals, legal issues, or emergency situations involving permission outside our normal pass policies are to be referred to the Director for final resolution. The pass requests will require your sentencing judge's approval.

Residents will be granted a maximum of 2 hours pass time for a haircut once per month and 1 hour to shop at Giant Eagle or Family Dollar at Wharton Plaza or at the Goodwill store on East Carson once a week.

Residents will be informed only if their pass request has been rejected, and the Director will state the reason for the rejection on the pass request form.

Appropriate verifications must be submitted by each resident as denoted on the short term and job search pass form.

Any contact you have with law enforcement authorities while on pass shall immediately be reported to the House manager upon your return to the facility.

No resident will be denied access to attend court hearings or communication with legal counsel provided that the appointments can be verified.

5/09 4-ACRS-6A-01



DAN ONORATO
CHIEF EXECUTIVE

BUREAU OF CORRECTIONS

County of Allegheny

950 SECOND AVENUE
PITTSBURGH, PA 15219-3100
PHONE: (412) 350-2000; FAX: (412)350-2032

RAMON RUSTIN
WARDEN

GREGORY GROGAN
DEPUTY WARDEN

LANCE BOHN
DEPUTY WARDEN

July 13, 2009

Ms. Lori Churilla
Assistant Deputy Controller
Division of Auditing
201 Courthouse
Pittsburgh, Pa 15219

Dear Ms. Churilla,

Accompanying this correspondence is a response to recommendation provided by your office, applicable to the recent Contract Compliance Review of Goodwill Industries of Southwestern Pennsylvania for the period April 1, 2007 through December 31, 2008.

Periodic reviews such as those conducted by your agency, are vital to the compliance of monetary and systemic applications between County entities and contract providers. Notwithstanding, the County Jail has directly benefited from past audits conducted by the Controller's Office.

I would like to take this opportunity to thank you and your staff for your efforts in the Compliance Review of Goodwill. My staff and I will be available to assist your office with any further information applicable to this matter.

Sincerely,

Ramon Rustin
Warden, Allegheny County Bureau of Corrections

COMPLIANCE REVIEW
GOODWILL INDUSTRIES OF SOUTHWEST
PENNSYLVANIA
APRIL 1, 2007 THROUGH DECEMBER 31, 2008

Controller's Recommendation #1

*Ensure that the \$1,491 owed by Goodwill is collected.

Jail Response to Recommendation #1

**Upon the reopening of Goodwill from the renovation of its physical plant, Jail Administration will recoup the \$1,491 as stipulated within the Controller's report.