# Partners for Reentry Opportunities in Workforce Development
# Grant Guide

## February 2025

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# Background

The Texas Workforce Commission (TWC) received the Partners for Reentry Opportunities in Workforce Development (PROWD) discretionary cooperative agreement (grant) from funding provided by the U.S. Department of Justice (DOJ) and the U.S. Department of Labor (DOL) to support participants who are in the custody of the Federal Bureau of Prisons (BOP). This grant is designed to help identify employment opportunities for participants based on criminogenic and employment assessments and local labor market information (LMI). Based on assessment results, participants will enter a career pathway related to the individual's education, employment history, and training needs. The current grant period is from September 30, 2023, through September 30, 2027.

# Goals

The PROWD grant program seeks to better align job training and skills development services provided to program participants with the specific labor market needs of the communities where they will reside. In doing so, the program will improve both the employment outcomes of returning citizens and public safety for all community members while increasing the effectiveness of justice and workforce system partnerships. The goal of Texas PROWD is to implement evidence-based, dedicated services that will improve the outcomes for individuals currently in, or recently released from, the custody of the BOP. The grant will serve at least 1,180 eligible individuals. Performance is based on employment rates, median earnings, credential attainment, Measurable Skill Gains (MSGs), effectiveness in serving employers, and recidivism.

# Definitions

**Bureau of Prisons Facilities**—either Federal Correctional Institutions (FCIs) or Residential Reentry Centers (RRCs) with which Local Workforce Development Boards (Boards) collaborate to provide services in Stage 1 or 2 of the grant

**Federal Correctional Institutions (FCIs)**—designated institutions in local workforce development areas (workforce areas) with which Boards partner for this grant

**No-Hostage Policy**—BOP employees will not permit offenders to use hostages to escape from custody or otherwise interfere with orderly institutional operations. Hostages will not be recognized for bargaining purposes.

**Prerelease**—a BOP custody status in which individuals remain under BOP jurisdiction while in custody

**Residential Reentry Centers (RRCs)**—facilities that help inmates who are nearing release. RRCs provide a safe, structured, supervised environment as well as employment counseling, job placement, financial management assistance, and other programs and services. RRCs help inmates gradually rebuild their ties to the community and facilitate supervising second-chance individuals' activities during their readjustment phase.

**Transfer**—warm hand off of services for an individual receiving services from the Texas PROWD grant program to another state's PROWD grant program

# Planning Requirements

Boards must review the following steps to ensure the completion of each requirement:

- **Program Initiation**
  - ➤ Have you outreached local BOP and RRC facilities to ensure that all requirements for staff entering the facility have been met, including trainings, background checks, and completion of documents?
  - ➤ Have you met with stakeholders and potential employers to brainstorm community needs and obtain written commitments? Please report who you have met with, and in what capacity, using the reporting tool.
  - ➤ Have you identified and contacted potential employers to discuss hiring individuals with criminal records and the potential barriers? Please report who you have met with, and in what capacity, using the reporting tool.
  - ➤ Have you created a recruitment plan and received approval for any recruitment materials that will be used in BOP facilities? Has the program manager and other necessary staff been hired?
  - ➤ Is your program prepared to begin enrollment based on your implementation plan?
  - ➤ Do all staff providing prerelease services have official clearance to enter BOP correctional facilities?
  - ➤ Are your local support service partnerships solidified?
- **Data Collection and Reporting**
  - ➤ Are the reporting requirements clear?
  - ➤ Have you determined which staff members will be responsible for data collection and input?
  - ➤ Do you have a plan to protect participants' personally identifiable information (PII)?

# Volunteer/Staff Information

Please reach out to your grant manager for the Release of Information, Application for Volunteers, and Criminal History Check to use for reference when onboarding volunteers and staff members.

All volunteers and staff members must be informed of the no-hostage policy during the interview stage for this grant.

# Eligibility

Participants must be currently at or within six months of release from a BOP-contracted FCI or RRC facility in one of the following workforce areas:

- Rural Capital Area

- Southeast Texas
- Borderplex
- Greater Dallas
- Northeast Texas
- Alamo
- Cameron County

Participants must have at least 45 days left in an RRC to be eligible. Participation is voluntary, and eligible candidates are required to complete an enrollment form indicating their willingness and desire to receive services and fulfill the program requirements. Participants are enrolled in either Stage 1 (during incarceration) or Stage 2 (while in an RRC or in home confinement) depending on the partner facilities in the designated workforce area. Individuals in Stage 2 may be in a BOP-custody status called prerelease.

There are three types of prerelease custody, as follows:

- Placement into a BOP-contracted RRC
- Home confinement at an approved residence with location monitoring (for example, a GPS ankle bracelet)
  **Note:** This status is managed by a BOP contract vendor.
- Federal Location Monitoring (FLM)—a joint program between U.S. Probation and BOP in which individuals are technically in BOP custody but are supervised by U.S. Probation officers. These individuals are required to live at an approved residence and are monitored via location monitoring devices.

Walk-in customers may not be enrolled as program participants. Program participants must meet the eligibility requirements listed above.

## Program Services

This program serves participants during incarceration in an FCI (Stage 1), during time spent in an RRC (Stage 2), and after release from the RRC into the community (Stage 3). TWC and the identified partner Boards will work in conjunction with the identified FCIs and RRCs to identify eligible participants. BOP unit case managers will engage incarcerated applicants before release, and Workforce Solutions Office staff will provide the applicants with an orientation that explains the following program services:

- Assessment—a Universal Employment Plan that identifies the participant's needs and barriers to employment after release and a criminogenic assessment, provided by the BOP to the applicant, to better serve program participants
- Individual Employment Plan (IEP)—a plan developed in collaboration with the participant that includes specific steps the participant will take to address barriers to employment and uses LMI to develop a customized career pathway
- Education and training services—prison-based and workforce services to provide vocational and occupational training and adult education and literacy services
- Financial literacy training
- Job readiness courses—such as soft skills training provided pre- and postrelease

- Career exploration—including LMI provided pre- and postrelease
- Coordinated case management—discharge planning, including referrals to mental health and substance abuse services; assistance in obtaining a driver's license, Texas ID card, or Social Security Number (SSN); reengagement of and outreach to family and support networks; and coordination between BOP and the Boards for continued services postrelease
- On-the-job training (OJT)
- Fidelity bonding
- Vocational rehabilitation services, if applicable
- Workforce Opportunity Tax Credit (WOTC) information
- Peer mentoring—Boards will develop connections to local peer support service programs that provide peer mentors to aid in successful community integration, connection to services, increased prosocial connection, and decreased recidivism. Case managers will provide peer mentor resources to enroll participants, encourage participation, and track mentoring activities, and their impact, for participants using the resources.
- The PROWD grant places an emphasis on coenrolling participants in WIOA career services or educational and training services, as appropriate, with the overall goal of placement in suitable unsubsidized, self-supporting employment or placement in a training program that leads to an industry-recognized credential.
- Follow-up services for 12 months after the participant exits out of the program

## Peer Mentoring

Peer mentoring is a powerful tool to support incarcerated or previously incarcerated individuals returning to the community. Peer mentors can connect with participants on a deeper level because they have shared the experiences of their mentees. The role of the peer mentor is to provide guidance, encouragement, and support to their mentee and help them acclimate to their new environment. Peer mentors can assist with common barriers to sustaining successful reintegration.

Peer mentoring is a proven strategy for retaining participants. Grantees should pair participants with others who have shared lived experiences and start a peer mentoring program whereby they can meet at least once weekly outside of their class schedule times. For subsequent cohorts, grantees may also request to invite graduates from the first cohort to speak to the new class or provide group mentoring as a class session. Peer mentoring has proven beneficial during periods of transition. Peer mentors with lived experience can more easily gain the trust of participants and help them develop a personal story on navigating reentry successfully. Grantees should work with the RRCs to create a peer mentoring program. The earlier this intervention takes place, the better. Peer mentors and mentees may meet at the RRC or off-site. Grantees should maintain a record of these meetings and may be required to share this information with the RRCs. Please refer to [WorkforceGPS—PROWD Resources](#) for further information on peer mentoring.

## Support Services

Boards must review current or develop new support services policies specifically for this grant. Please refer to [Training and Employment Guidance Letter (TEGL) 19-16](#), issued March 1, 2017, and titled, "Guidance on Services provided through the Adult and Dislocated Worker Programs

under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules," for further information.

## Developing an IEP

The case manager collaborates with the participant to develop an IEP that addresses the participant's specific needs based on the outline for each category described below. TWC encourages staff to use the employment plan template in WorkInTexas.com so that the participant can have online access. When developing the IEP, staff must incorporate and provide the participant with access to customized TWC LMI, specific to the participant's needs.

The IEP must include the following:

- A specific employment goal as determined by the appropriate pathway and the participant's employment interests and goals
- Documentation of barriers that may affect the participant's ability to find suitable work
- Descriptions of activities that the participant will complete
- Timelines to start and complete each activity, including follow-up appointments
- Verification by the BOP or RRC to ensure that the IEP does not create a conflict with the participant's conditions of supervision

## Career Pathways

Board case managers will gather criminogenic risk information from participants if the participant chooses to share that information. The case manager will then work with the participant to complete the objective, employment-based assessment of needs and barriers. This information is used to refer participants to one of the following three general career pathways that correlate to the individual's specific education, employment service, and training needs:

- **Pathway One** is for participants who are basic skills deficient. These participants will be offered the following services, as appropriate, before being referred to occupational or vocational skills training:
  - Referral to an education partner for academic/Adult Basic Education (ABE)/High School Equivalency (HSE)/English language learner instruction. These services will be provided to any participants in Stage 2 or 3 who have not already completed ABE or HSE programs offered through BOP during incarceration.
  - LMI access
  - Job readiness training
  - Soft skills training
  - Financial literacy training
  - Referral to mental health services and substance abuse dependency services, if applicable
- **Pathway Two** is for participants who have a high school degree or advanced education. These participants will receive all services available to Pathway One participants—except for ABE services—as determined necessary before being referred to occupational or vocational skills training.

- **Pathway Three** is for participants expected to have a credential or certifications and will be offered the following:
  - ➢ LMI access
  - ➢ Job readiness training
  - ➢ Soft skills training
  - ➢ Financial literacy training
  - ➢ Referral to mental health and substance abuse dependency services, if applicable
  - ➢ Stacked certifications

The skills training selected for the program will be free of state or local licensing regulations that prohibit individuals with criminal records from procuring a license in that career.

## Fidelity Bonding

TWC offers free fidelity bonding services designed to mitigate employment risk as a barrier to employment and alleviate employer concerns about hiring at-risk job applicants. Bonding involves the issuance of an insurance policy that protects the employer against employee acts of dishonesty such as larceny, embezzlement, and theft.

Important features of this service include the following:

- Free bonding coverage is provided for a six-month period; thereafter, it can be renewed through the regular commercial network.
- The bond reimburses the employer for any property or monetary loss due to employee dishonesty.
- Coverage ranges from $5,000 to $25,000, and there is no deductible.

Case managers should promote the availability of this service to all potential employers of program participants.

## Work Opportunity Tax Credit

Work Opportunity Tax Credit (WOTC) is a federal income tax benefit administered by DOL and the U.S. Department of the Treasury, Internal Revenue Service, for employers that hire individuals from specified target populations, including second-chance individuals. WOTC reduces a business' federal tax liability, serving as an incentive to select job candidates who may be disadvantaged in their efforts to find employment. The main objective of this program is to enable individuals to become employed, earn a steady income, and become contributing taxpayers. Case managers should promote the availability of this service to all potential employers of program participants.

## Partnerships

Effective partnerships are essential among organizations that serve individuals returning to the workforce. Therefore, correctional facilities, workforce development agencies, and community-based organizations must work together. No single institution can address all the needs of this population. Identifying the right agencies and community leaders for partnerships is key to the success of PROWD. While some may be state agencies and educational institutions, the majority

will likely be agencies providing supportive services at the grassroots level. To effect changes in the community, everyone who might be involved in these changes must be at the table from the onset, working to improve the outcomes for returning individuals, their families, and their communities. Partnerships across agencies and systems, the private and public sectors, and communities are a central element of this program and may include:

- state workforce agencies;
- BOP facilities;
- RRCs;
- Texas Department of Licensing and Regulation (TDLR);
- public safety and/or violence prevention agencies;
- state or federal apprenticeship agencies;
- state Medicaid programs;
- housing authorities;
- transportation providers;
- state education providers;
- state reentry councils;
- U.S. Probation offices and officers;
- industry organizations and employers;
- unions and other organized labor organizations;
- local social service providers;
- other nonprofits; and
- others, as necessary, to meet program design and participant needs.

## BOP Facilities

| Boards | Counties Served | Operational Stage | BOP Facilities |
|---|---|---|---|
| Rural Capital Area | Bastrop, Blanco, Burnet, Caldwell, Fayette, Hays, Lee, Llano, Travis (located in adjacent Board area), Williamson | Stages 1, 2, 3 | FCI Bastrop, RRC Core Civic |
| Southeast Texas | Hardin, Jefferson, Orange | Stages 1, 3 | FCI Beaumont |
| Greater Dallas | Dallas County | Stages 1, 2, 3 | FCI Seagoville, Volunteers of America Texas RRC |

| Boards | Counties Served | Operational Stage | BOP Facilities |
|---|---|---|---|
| Borderplex | Brewster, Culberson, Davis, El Paso, Hudspeth, Jeff, Presidio | Stages 1, 2, 3 | FCI La Tuna, Dismas Charities RRC |
| Northeast Texas | Bowie, Cass, Delta, Franklin, Hopkins, Lamar, Morris, Red River, Titus | Stages 1, 3 | FCI Texarkana |
| Alamo | Atascosa, Bandera, Bexar, Comal, Frio, Gillespie, Guadalupe, Karnes, Kendall, Kerr, McMullen, Medina, Wilson | Stages 2, 3 | Crosspoint Inc RRC |
| Cameron County | Cameron County | Stages 2, 3 | GEO Reentry RRC |

## Board Coordination Responsibilities

Boards may continue with a memorandum of understanding (MOU) with identified FCIs and RRCs, if one is already in place, to provide access to employment services on a more regular basis to eligible program participants. Boards collaborate with their respective FCIs and RRCs to understand existing gaps in access to employment services for inmates as follows:

- Boards must provide PROWD information sessions to individuals housed at BOP locations at least monthly. Individuals who have previously attended a session do not need to attend every session.
- Workforce Solutions Office staff members from specialized departments (such as Veteran Services, Child Care, and Vocational Rehabilitation) will attend quarterly informational sessions, when scheduled, to provide more detailed information on their services and answer individual questions.
- Staff will use these regular sessions at BOP facilities to help inmates begin the intake and orientation process for relevant workforce programs so that, upon their release, they can immediately begin services.
- Boards may propose, in addition to the monthly PROWD information sessions, a schedule of specific employment services in consultation with BOP facilities.

# Reporting

Boards must track all data elements required on the WIOA primary indicators of performance as well as PROWD-specific performance measures. Boards must submit reports on the provided report format per the interval provided in the grant award.

Boards must electronically submit an accurate monthly financial report, including accrued expenditures and obligations, no later than 11:59 p.m. (CT) on the 20th calendar day of each month through TWC's Cash Draw and Expenditure Reporting (CDER) system. A financial closeout package must be submitted through the CDER system no later than 11:59 p.m. (CST) on or before 60 calendar days from the grant end date. Additionally, Boards must submit a final report to the designated TWC grant manager on or before 30 calendar days after the grant end date. Boards will also be required to submit ad hoc reports as requested by TWC.

## Required Reporting Schedule

Boards must submit reports to their TWC grant manager as outlined in the contract for this grant.

# Performance Indicators and Targets

| WIOA Performance Indicator | Target |
|---|---|
| Employment Rate—2nd Quarter After Exit | 70% |
| Employment Rate—4th Quarter After Exit | 67% |
| Median Earnings—2nd Quarter After Exit | $5,400 per quarter |
| Credential Attainment Rate | 73% |
| Measurable Skill Gains | 67.5% |
| Effectiveness in Serving Employers | Baseline—new measure |

| PROWD-Specific Performance Indicator | Target |
|---|---|
| Enrollment Rate | 100% of contract target per Board |
| Recidivism Rate | Less than the Texas recidivism rate of 20.3% |

## WIOA Performance Indicators

WIOA §116(b)(2)(A) establishes and defines the following six indicators of performance:

- **Employment Rate—2nd Quarter After Exit**: The percentage of participants who are in unsubsidized employment during the second quarter after exit from the program. The target is 70 percent.

- **Employment Rate—4th Quarter After Exit**: The percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program. The target is 67 percent.
- **Median Earnings—2nd Quarter After Exit**: The median earnings of participants who are in unsubsidized employment during the second quarter after exit from the program. The target is $5,400 per quarter.
- **Credential Attainment Rate**: The percentage of those participants enrolled in an education or training program (excluding those in OJT and customized training) who attain a recognized postsecondary credential, a secondary school diploma or its recognized equivalent, or an industry-recognized credential during participation in or within one year after exit from the program. A participant who has attained a secondary school diploma or its equivalent is included in the credential attainment rate only if the participant is also employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year after exit from the program. The target is 73 percent.
- **Measurable Skill Gains (MSGs)**: The percentage of participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving MSGs, defined as documented academic, technical, occupational, or other forms of progress toward a credential or employment. The target is 67.5 percent. Depending on the type of education or training program, documented progress is defined as one of the following:
    - Documented achievement of at least one educational functioning level of a participant who is receiving instruction below the postsecondary education level
    - Documented attainment of a secondary school diploma or its recognized equivalent
    - Secondary or postsecondary transcript or report card for a sufficient number of credit hours that shows a participant is meeting the state unit's academic standards
    - Satisfactory or better progress report toward established milestones, such as completion of OJT or completion of one year of an apprenticeship program or similar milestones from an employer or training provider
    - Successful passage of an exam that is required for a particular occupation or progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as knowledge-based exams
- **Effectiveness in Serving Employers**: The percentage of participants who are employed with the same employer in the second and fourth quarters after exit. A baseline is being set, as this is a new measure.

## PROWD Performance Indicators

- **Enrollment Rate**: The number of participants enrolled in the program divided by the enrollment goal. The target is 100 percent.
- **Recidivism Rate**: The percentage of participants convicted of a new crime that was committed within 12 months of their release from the care and custody of the BOP. The conviction may occur at any time during the grant's performance period. The target is less than the Texas recidivism rate of 20.3 percent.

# Recidivism

Staff may work with participants who have been rearrested, reincarcerated, or convicted of a new or previous crime who can still benefit from the services provided upon their release. The cases of individuals who have been exited from the grant due to recidivism can be reopened, and the participants can be served as they continue to count toward performance. Recidivism is based on those convicted of new crimes committed within 12 months after release.

# Participant Transfers

When Boards become aware of a participant who will require a transfer to another PROWD grantee, the Board must notify its TWC grant manager to arrange a warm hand off. The following documents will provide information and resources needed to complete the transfer:

- Attachment 1: Guidance for Supporting PROWD Participant Transfers Between States
- Attachment 2: PROWD Participant Transfer Information Sheet
- Attachment 3: Release of Information Consent Form
- Attachment 4: PROWD Service Areas and RRCs

# Data Entry

All participant data must be entered into the Grantee Performance Management System (GPMS) and provided to the grant manager. Once a participant is entered into the GPMS, they cannot be removed. Participant information must not be entered into the GPMS database until the participant has completed the intake paperwork. Any services provided before the participant is active in GPMS cannot be charged to the grant. Services to individuals who withdraw from the program before GPMS activation must be coded as universal employment services. Records may be kept on paper forms until GPMS is activated. In Stage 3, participation is established when a candidate completes the full WorkInTexas.com registration.

# Monitoring

Boards must attend monthly Microsoft Teams meetings to review the following:

- Enrollments versus expenditures
- Expenditures versus grant time elapsed
- Obligations (if grantee has subgrantees)
- Remaining balances and/or expenditure patterns
- Comparison between projected and actual enrollment and expenditures
- Deliverables and/or outcomes
- Participant and program progress
- Pending issues and/or status from previous meeting or calls

TWC will monitor subgrantees to ensure the effective use of grant funds to provide participants services, including, but not limited to, the following:

- Privacy standards for information transfer to ensure case managers follow the TWC Enterprise Information Security Policy
- Expenditures and funding limits
- Appropriate use of funds
- Case documentation, including the following:
  - ➢ Eligibility
  - ➢ Assessments
  - ➢ Employment plans
  - ➢ Follow-up services

# Personally Identifiable Information

Case managers must follow the TWC Enterprise Information Security Policy and the requirements contained in TEGL 39-11, issued June 28, 2012, and titled, "Guidance on the Handling and Protection of Personally Identifiable Information (PII)," and WD Letter 02-18, Change 1, issued March 18, 2024, and titled, "Handling Sensitive Personal Information and Other Confidential Information—Update," to ensure the protection of all sensitive and confidential personal information TWC collects and maintains. TWC personnel prioritizes data security and takes all necessary and appropriate measures to ensure sensitive and confidential information is adequately protected. This policy and its associated standards, guidelines, and procedures can be found on the TWC intranet. Electronic exchange of any applicant's or participant's sensitive and confidential information requires all documents and related materials to be encrypted and password protected. Passwords to access the encrypted information must be sent in a separate email from the encrypted data.

# Priority of Service

Eligible veterans and former foster youth are entitled to priority of service as outlined in TWC guidance for programs funded in whole or in part by state or federal funds.

# Exit

A participant will automatically be exited from the GPMS when they have not received any qualifying participant-level services that are staff-assisted or individualized for a 90-day period or the participant has reached the September 30, 2026, deadline while still receiving services. Participant-level services include staff-assisted job search, apprenticeships, training, or case management. In Stage 3, support services may also be considered a participant-level service. Participant-level services do not include self-service, information-only services, or activities. When a participant no longer needs services, an exit date is retroactively set by an auto-calculation to the last date of a qualifying participant-level service. The participant begins follow-up after exit. Boards may not charge any grant services to the grant past the participant's follow-up period.

## Other Exits

A participant may exit for other reasons, which must be documented adequately in the participant's case file. These reasons include the following:

- The customer has health and/or medical issues and is not able to work or is approved for Supplemental Security Income or Social Security Disability Insurance.
- The customer is deceased.
- The customer has moved from the service area to an area that does not have a PROWD grant in place. The correctional system has mandated the customer to relocate, the customer's new address is outside of any PROWD grantee's service area, and it is not possible to effectively continue services.

In certain situations, participants may not physically be at the program site due to special circumstances, such as family emergencies. The Workforce Solutions case manager is responsible for maintaining contact with the participant and ensuring that they receive qualifying participant-level services throughout the quarter so that they are not automatically exited from GPMS so long as the participant needs services.

## Follow-Up Services

Program closure, which triggers follow-up services to begin, can be accomplished in the following two ways:

- The participant has completed training and is working in unsubsidized self-sustaining employment. In this case, exit would occur on the first day of employment, and follow-up services would begin.
- The participant is receiving services but has reached the September 30, 2026, deadline to begin follow-up services. This participant would exit on September 30, 2026, and begin follow-up services, which may include continued job search assistance.

Boards are required to provide follow-up services to each program participant for 12 months after the participant closes out of the program. All participant activities must be closed on or before September 30, 2026, to allow for 12 months of follow-up. Follow-up services will be provided to help with job retention and support services during the remainder of the project period. Support services can be provided through coenrollment in the WIOA program.

## Attachments

Attachment 1: Guidance for Supporting PROWD Participant Transfers Between States

Attachment 2: PROWD Participant Transfer Information Sheet

Attachment 3: Release of Information Consent Form

Attachment 4: PROWD Service Areas and RRCs

# List of Revisions

**October 2024**

| Section | Revisions |
|---|---|
| Board Coordination Responsibilities | Removed requirement to develop a memorandum of understanding and clarified coordination requirements |
| BOP Facilities | Updated participating Boards |
| Data Entry | Clarified data entry requirements |