Sea Inc.

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VERMONT STATE AUDITOR

September 30, 2013

Susan Mesner
Deputy Auditor
132 State Street
Montpelier, VT 05633

Susan,

It was great to meet you and Linda Lambert at your visit on July 2, 2013. As I said at the time, I welcome the unannounced visit, the general discussion we had, and your review of our files. Since we opened our Transitional Housing program in September, 2010, we have strived to build a program that would fulfill a need of Bennington County and the State of Vermont. Feedback that we receive from the State is valuable to us, as we continue to build the 206 Depot Program.

Your non-audit inquiry pointed out areas where our Program was lacking the proper documentation in our resident's files, and raised important questions regarding some of our practices. I have reviewed Commissioner Pallitos' response and remedial action plan. Our responses to the issues raised in your report are as follows:

1. Case management assessments: As of today, all of our current residents have in their file a completed written case plan, based on results of the LSI-R (Level of Service Inventory-Revised), an assessment tool completed by offenders and DOC staff.

2. Case planning services: In meeting with the manager and supervisors of the local DOC office, we have agreed that 206's Case Plans will be used as

part of the OCP (Offender Case Plan), a copy of which will be in the residents file. This process is still in development.

3. Documentation of Services and Outcomes: As of last week, after much time was put in interfacing with a sometimes difficult Service Point system, we believe we are up to date with services provided to our population going back to the beginning of FY '14.

4. Length of Stay: From the day this Program opened, our goal has been to provide Bennington County with a quality transitional housing program that could best meet the needs of its offenders. Toward that end we have worked very closely with the local DOC office to identify and assess the needs of each and every resident we serve. We intentionally have remained flexible in deciding the types of residents we serve, and for how long they stay, based upon their need. We rely heavily on feedback from the local DOC office, as well as other members of the resident's treatment teams. In my opinion this has been a successful process; a process that has made the needs of the resident /offender a priority. Much communication between 206 and the local office takes place regarding these decisions. We conservatively estimate that in FY '13 over 2000 emails were sent back and forth between 206 staff and PO's/supervisors. However, we realize that the documentation of this communication, and these decisions, needs to be improved. We also believe that sections of the MOU and the Agreement are in need of updating, as they do not at this time accurately reflect what this Program has evolved into. I personally meet monthly with the local District Manager. Supervisors and Probation Officers routinely attend these meetings. At every meeting we discuss the progress of every one of our current residents. We have begun to document the specifics of these meetings, a copy of which is filed at 206.

5. Calculation of Housing Fees: For the last two years, the Programs housing fee policy has been the following. For the first 60 days a resident is in the Program, there is no charge. After 60 days the resident pays $50 per month for the time he remains in the Program. Residents receive a receipt for each payment. We keep a copy of the receipt for our records, and in addition we document the payment into another book in our office. This system has worked very well in our opinion. There have been exactly two occasions where residents have paid more. In both those occasions, the resident's treatment team (which included case manager, clinician, PO and supervisor, <u>in addition to</u> the 206 Director) agreed on this arrangement, and both

residents were in fact returned the excess minus $50 per month, when they completed the Program.
The first year we were open, we looked at other payment options, primarily based on resident's income, and "ability to pay". We found this system unworkable, and often counterproductive to the goal of "...ultimately provide offenders with an opportunity to truly transition into their own residence" as stated in the Agreement (p. 3).
Moving forward, we will insure that documentation of each residents housing fee payment will be placed in each residents file. We also think it is important to take a look at both the grant Agreement and the MOU as it pertains to housing fees, with the goal being "a mutually negotiated subsequent usage plan" that ensures transparency, assures taxpayer protection, and takes into account the Programs financial viability.
One final aspect of this issue needs to be clarified. **The 206 Depot Program has never charged a cell phone fee, nor any other fee to its residents, other than the above mentioned housing fee.** Your report does acknowledge that it was another program; however its wording appears to have led some to incorrectly interpret it as a 206 issue.

6. Conditions of Release: DOC has provided us with Conditions of Release for all current residents, which are now in each resident's newly renovated file.

7. Background Checks for Staff: For 20 years SEALL policy has required background checks for all staff. Every staff member that has ever worked at 206 Depot has a background check documented in their file, which is located in our (off site) business office.

At this point we consider us at or close to compliance in many areas, and are working closely with DOC to get into full compliance in all areas. We recognize the importance of accurately and consistently documenting the work we do. I appreciate your role in the Program's evolution, and look forward to a return visit.

Sincerely

John Winchester
206 Depot Program Director

cc:Andrew Pallito